

**U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT**

PRIVACY THRESHOLD ANALYSIS (PTA)

**Section 202 Supportive Housing for the
Elderly Application Submission
2502-0267**

Office of Recapitalization

Instruction & Template

February 26, 2019

PRIVACY THRESHOLD ANALYSIS (PTA)

The PTA is a compliance form developed by the Privacy Branch to identify the use of Personally Identifiable Information (PII) across the Department. The PTA is the first step in the PII verification process, which focuses on these areas of inquiry:

- Purpose for the information,
- Type of information,
- Sensitivity of the information,
- Use of the information,
- And the risk to the information.

Please use the attached form to determine whether a Privacy and Civil Liberties Impact Assessment (PCLIA) is required under the E-Government Act of 2002 or a System of Record Notice (SORN) is required under the Privacy Act of 1974, as amended.

Please complete this form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to the HUD Privacy Branch:

John Bravacos, Senior Agency Official for Privacy
Privacy Branch
U.S. Department of Housing and Urban Development

privacy@hud.gov

Upon receipt from your program PLO, the HUD Privacy Branch will review this form. If a PCLIA or SORN is required, the HUD Privacy Branch will send you a copy of the PCLIA and SORN templates to complete and return.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name and OMB #:	Section 202 Supportive Housing for the Elderly Application Submission		
Program:	Office of Housing		
CSAM Name (if applicable):	Grants.gov	CSAM Number (if applicable):	
Type of Project or Program:	Form or other Information Collection	Project or program status:	Update
Date first developed:	N/A	Pilot launch date:	N/A
Date of last PTA update:	June 7, 2013	Pilot end date:	N/A
ATO Status (if applicable)	Not started	ATO expiration date (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Katonja Jackson		
Office:	Office of Recapitalization	Title:	Systems Support Manager
Phone:	(202) 402-8380	Email:	katonja.l.jackson@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Tracene Davis		
Phone:	(202)402-5748	Email:	Tracene.L.Davis@hud.gov

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: New PTA

This collection of information is for applicants that wish to apply for funds to develop housing for low- and very-low income elderly persons under the Section 202 Capital Advance Program. Eligible applicants are nonprofit organizations and consumer cooperatives (known as sponsors/owners) and their application must also include the following Standard and/or HUD Forms with a descriptive for each form listed below:

- **Form SF-424, Application for Federal Assistance** is used for the applicant to provide a funding matrix listing each program for which HUD funding is being requested.
- **Form HUD-92015-CA, Application for Capital Advance Summary Information** is used for applicants to provide information basic project and/or site information (Name, Address, Building Type, Community, etc.)
- **Form HUD-2530, Previous Participation Certification.** The 2530 form is used for applicants to provide detailed information of their current organization makeup and their past participation and performance in housing projects.
- **Form HUD-2880, Applicant/Recipient Disclosure/Update Report,** is used to disclose any other Government assistance, which may be provided in connection with the proposed project.
- **Form HUD-2993, Acknowledge of Application Receipt.**
- **Form HUD-92041, Sponsor's Conflict of Interest Resolution** is used to certify that none of the Sponsor's officers or directors has or will have any financial interest in any contract with the Owner or in any firm or corporation that has or will have a contract with the Owner, for the provision of goods or services to the project, which is a regulatory requirement.
- **Form HUD-92042, Sponsor's Resolution for Commitment to Project** is a certified resolution from the applicant's Board acknowledging its responsibilities of sponsorship and long-term support of the project, along with its willingness to fund the minimum capital investment, estimated start-up expenses, and the cost of any amenities or features that cannot be covered by the capital advance.
- **Standard Form LLL** is a Disclosure of Lobbying Activities.

2. Does this system employ the following technologies?

If you are using these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.

- Social Media
- Web portal¹ (e.g., SharePoint)
- Contact Lists
- Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)
- None of these

¹ Informational and collaboration-based portals in operation at HUD and its programs that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program collects no personally identifiable information²</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p> <p><input checked="" type="checkbox"/> Other (e.g. business entity)</p>
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4. What specific information about individuals is collected, generated or retained?

This collection of information is for applicants that wish to apply for funds to develop housing for low- and very-low income elderly persons under the Section 202 Program. Eligible applicants are nonprofit organizations and consumer cooperatives (known as sponsors/owners). Form HUD 2530 of this collection collects Social Security Number or IRS employer number of every principal listed, including on the sponsor/owner board.

<p>4(a) Does the project, program, or system retrieve information from the system about a U.S. Citizen or lawfully admitted permanent resident aliens by a personal identifier?</p>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: SSNs or IRS Employer Number</p>
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<p>4(b) Does the project, program, or system have an existing System of Records Notice (SORN) that has already been published in the Federal Register that covers the information collected?</p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, provide the system name and number, and the Federal Register citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system:</p> <p><i>[Redacted]</i></p>
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<p>4(c) Has the project, program, or system undergone any significant changes since the SORN?</p>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please describe.</p>
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² HUD defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

<p>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<p><input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.</p>
<p>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</p>	<p>Form HUD 2530 of this collection collects Social Security Number (SSN) or IRS employer number of every principal listed, including on the sponsor/owner board. The Department of Housing and Urban Development (HUD) is authorized to collect this information by law (42 U.S.C. 3535(d) and 24 C.F.R. 200.217) and by regulation at 24 CFR 200.210. financial and contractual obligations. In addition, Form HUD 2880 also includes SSNs.</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>The information in the form HUD 2530 is used by HUD to determine if controlling participants meet the standards established to ensure that in all HUD projects, they will honor their legal, financial and contractual obligations and are acceptable risks from the underwriting standpoint of an insurer, lender, or government agency.</p> <p>The information in the form HUD 2880 is for those applying for assistance from HUD for a specific project or activity and they have received, or expect to receive, assistance from HUD in excess of \$200,000 during the during the fiscal year.</p>
<p>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer this question.</p>
<p>4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>N/A</p>	
<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>

³ Header: Information that is placed before the actual data. The header normally contains a small number of bytes of control information, which is used to communicate important facts about the data that the message contains and how it is to be interpreted and used. It serves as the communication and control link between protocol elements on different devices.

Payload data: The actual data to be transmitted, often called the payload of the message (metaphorically borrowing a term from the space industry!) Most messages contain some data of one form or another, but some actually contain none: they are used only for control and communication purposes. For example, these may be used to set up or terminate a logical connection before data is sent.

<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<p>Choose an item. Not applicable. Please describe applicable information sharing governance in place: N/A</p>
<p>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all HUD personnel?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>
<p>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?</p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: N/A <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input checked="" type="checkbox"/> Unknown. <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

<p>Program PRA Liaison Reviewer:</p>	<p>Vivian Herring</p>
<p>Date submitted to Program Privacy Office:</p>	<p>February 26, 2019</p>

⁴ FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

Date submitted to HUD Privacy Branch:	February 26, 2019
Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
N/A	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	Click here to enter a date.
PTA Expiration Date:	Click here to enter a date.

DESIGNATION

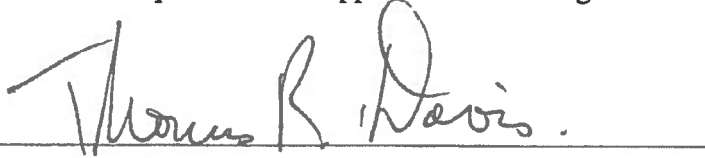
Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	<input checked="" type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your program Records Officer.
PIA:	Choose an item. If covered by existing PCLIA, please list: Click here to enter text.
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text.
HUD Privacy Branch Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSMENT

DATE REVIEWED:

PRIVACY REVIEWING OFFICIALS NAME:

By signing below, you attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.



3/25/19.
Date

Thomas R. Davis

**Director
Office of Recapitalization**



4/4/19
Date

John Bravacos

**Senior Agency Official for Privacy
Office of Administration**