

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**HUD Request for Acceptance of Changes in  
Approved Drawings and Specifications**

**Office of Single Family Program  
Development**

**Instruction & Template**

**January 2018**

## 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](mailto: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.

September 27, 2018 2

## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	<b>Office of Single Family Program Development</b>		
<b>Program:</b>	<b>Office of Housing</b>		
<b>CSAM Name (if applicable):</b>	Click here to enter text.	<b>CSAM Number (if applicable):</b>	Click here to enter text
<b>Type of Project or Program:</b>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Existing</b>
<b>Date first developed:</b>	Click here to enter a date.	<b>Pilot launch date:</b>	Click here to enter a date
<b>Date of last PTA update:</b>	Click here to enter a date.	<b>Pilot end date:</b>	Click here to enter a date
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	Click here to enter a date

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Click here to enter text.		
<b>Office:</b>	Click here to enter text.	<b>Title:</b>	Click here to enter text.
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	Click here to enter text.

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<b>Name:</b>	Click here to enter text.		
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	Click here to enter text.

September 27, 2018 3

## SPECIFIC PTA QUESTIONS

### **1. Reason for submitting the PTA: Choose an item.**

1. This request seeks OMB approval on information collected based on a builder's request for Acceptance of Changes in Approved Drawing and Specifications. The mortgagee submits Form HUD-92577 (OMB 2502-0117) to HUD requesting changes or revision to accepted set of construction documents (plans and specifications). In the administration of HUD's single family home mortgage insurance programs, FHA evaluates acceptability of both the property and the homebuyer to make certain that FHA's risk is adequately protected before home mortgage insurance is provided. An integral part of the mortgage insurance process is the determination of the eligibility of a property for a conditional commitment. An appraisal is made to evaluate the acceptability of the property for mortgage security and, if the property is found acceptable, to determine the maximum insurable mortgage amount or mortgage limit. This program is authorized under Section 203, National Housing Act (12 U.S.C. 1709 (b)). The Program regulations are in 24 CFR Part 203. If the borrower decides to change the plan after the borrower has closed on the loan, those changes must be documented on the HUD-92577 under Section 203(b) program. Section 203(b)(7) of the National Housing Act is a requirement for insurance eligibility for mortgage limit. To be eligible for insurance, a mortgage must contain such terms as and provisions with respect to insurance, repairs, alterations, payment of taxes, default, reserves, delinquency charges, foreclosure proceedings, anticipation of maturity, additional and secondary liens, and other matters as the Secretary may in his discretion prescribe. (12 U.S.C. 1709(b)).

A buyer of an existing one-to-four-unit home that needs repair or finance needed repairs to current home under Section 203(k) loan program may use the form HUD-92577 (OMB 2502-0117). FHA 203k program allows buyers to substantially rehabilitate homes with funds secured through their FHA-insured mortgage. This is a rehabilitation loan that meets 24 CFR 203.50. HUD requires the lender to approve the improvements to the house for the use of a 203k consultant. Section 203(k) of the National Housing Act authorizes the Secretary to use his/her discretion with respect to the handling of insurance, repairs, and alterations. The attached regulations are found at 24 CFR 203.17, 24 CFR 203.50.

This is for the renewal of the existing form HUD-92577 with changes to accommodate both Section 203(b) due to changes to approved drawings and specifications; and Section 203(k) for rehabilitation or purchase and rehabilitation of an existing home; and an inclusion of false claims and statements warning above the signature lines to certify the changes or request made by the builder/sponsor, borrower, consultant and the mortgagee.

HUD staff review and approve the form and use it in monitoring. The information is not shared with any other organization inside or outside of HUD, except information request under freedom of information act (FOIA).

**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 portal<sup>1</sup> (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

**3. From whom does the Project or Program collect, maintain, use, or disseminate information? Please check all that apply.**

This program collects no personally identifiable information<sup>2</sup>

Members of the public

HUD employees/contractors (list programs):

Contractors working on behalf of HUD

Employees of other federal agencies

Other (e.g. business entity)

**4. What specific information about individuals is collected, generated or retained?**

The Request for Acceptance of Changes in Approved Drawings and Specifications form is used to provide the changes and amendments to the approved drawings and specifications of new construction requested by the builder and or property owner through the lender. The form requires the property address, the FHA Case number, the name and address of the lender, and description of exact changes to the approved drawing and specifications requested, the Builder's estimate of the cost on each change and the determination as to acceptability (changes acceptable or unacceptable or changes acceptable (list of any conditions)).

The form has also been used for Section 203(k) repair or rehabilitation of existing one-to-four-unit residential properties. Therefore, the form is being revised to allow its continued use for Section 203(k) repair/rehabilitation of existing properties.

<sup>1</sup> 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.

<sup>2</sup> 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.

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September 27, 2018 5

<b>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?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<b>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?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. 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
<b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe.
<b>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b>	Click here to enter text.
<b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	Click here to enter text.
<b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b>  <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
<b>4(h) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	Click here to enter text.

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X No.

**5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?**

Yes. If yes, please list:

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<sup>3</sup> 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.

September 27, 2018 6

	Click here to enter text.									
<b>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</b>	<p><input checked="" type="checkbox"/> No.</p> <p>Yes. If yes, please list:</p> <p>Click here to enter text.</p>									
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b>	<p>Choose an item.</p> <p>Please describe applicable information sharing governance in place:</p>									
<b>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?</b>	<p><input checked="" type="checkbox"/> No.</p> <p>Yes. If yes, please list:</p>									
<b>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?</b>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p>Yes. In what format is the accounting maintained:</p>									
<b>4. Is there a FIPS 199 determination?<sup>4</sup></b>	<p>Unknown.</p> <p>No.</p> <p>Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:</p> <table> <tr> <td>Low</td> <td>Moderate</td> <td>High</td> </tr> </table> <p>Integrity:</p> <table> <tr> <td>Low</td> <td>Moderate</td> <td>High</td> </tr> </table> <p>Availability:</p> <table> <tr> <td>Low</td> <td>Moderate</td> <td>High</td> </tr> </table>	Low	Moderate	High	Low	Moderate	High	Low	Moderate	High
Low	Moderate	High								
Low	Moderate	High								
Low	Moderate	High								

## PRIVACY THRESHOLD ANALYSIS REVIEW

<sup>4</sup> 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.

**(TO BE COMPLETED BY PROGRAM PLO)**

<b>Program Privacy Liaison Reviewer:</b>	Click here to enter text.
<b>Date submitted to Program Privacy Office:</b>	Click here to enter a date.
<b>Date submitted to HUD Privacy Branch:</b>	Click here to enter a date.
<b>Program Privacy Liaison Officer Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i> Click here to enter text.	

**(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)**

<b>HUD Privacy Branch Reviewer:</b>	Click here to enter text.
<b>Date approved by HUD Privacy Branch:</b>	Click here to enter a date.
<b>PTA Expiration Date:</b>	Click here to enter a date.

**DESIGNATION**

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

*Please describe rationale for privacy compliance determination above.*

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.

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**Date**

**SYSTEM OWNER**

[\*\*<< Bobbi Borland>>\*\*](#)

[\*\*<<Office of Single Family Housing>>\*\*](#)

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**Date**

**CHIEF PRIVACY OFFICER**

[\*\*<<INSERT NAME/TITLE>>\*\*](#)

**OFFICE OF ADMINISTRATION**

September 27, 2018 10