

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Multifamily Default Status Report  
OMB Number 2502-0041**

**Office of Multifamily Asset Management and  
Portfolio Oversight**

**Instruction & Template**

**10/10/2018**

## 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.

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**SUMMARY INFORMATION**

<b>Project or Program Name:</b>	Multifamily Default Status Report		
<b>Program:</b>	Office of Housing		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	IT System	<b>Project or program status:</b>	Existing
<b>Date first developed:</b>	1999	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date of last PTA update:</b>	N/A	<b>Pilot end date:</b>	May 8, 2016
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	2000

**PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	Brian A. Murray		
<b>Office:</b>	Office of Multifamily Asset Management and Portfolio Oversight	<b>Title:</b>	Acting Director
<b>Phone:</b>	202 402 2059	<b>Email:</b>	Brian.a.murray@hud.gov

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

<b>Name:</b>	Sharon Parker		
<b>Phone:</b>	202 402 2557	<b>Email:</b>	Sharon.parker@hud.gov

## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: New PTA

This is a collection renewal and there have been no changes to the project since the last version. The regulations at 24 CFR 207.256 through 207.258 require a mortgagee to notify HUD when a mortgage payment is in default (more than 30 days past due), and to submit an election to assign a defaulted loan to HUD within a specified timeframe from the date of default. The regulation at 24 CFR 200 requires lenders to submit delinquency, default, election to assign, and other related loan information statuses electronically to HUD. Lenders previously used HUD Form 92426 for these submissions, however, with the implementation of the regulation requiring electronic notification, the Multifamily Delinquency and Default Reporting System (MDDR) was established to replace the paper form HUD-92426. HUD uses the information as an early warning mechanism to work with project owners and lenders to develop a plan that will reinstate a loan and avoid an insurance claim. It also provides HUD staff a mechanism for mortgagee compliance with HUD's loan servicing procedures and assignments.

### 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

<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.

<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> Please check all that apply.</p>	<p><input checked="" type="checkbox"/> This program collects no personally identifiable information<sup>2</sup></p> <p><input type="checkbox"/> Members of the public</p> <p><input checked="" 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) Lenders</p>
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>	
<p><i>There is no specific information about individuals collected when lenders make submissions to the system. They report information on delinquent and defaulted multifamily insured loans. The lender name is identified, the multifamily project name, multifamily project number, the amount of the unpaid principal balance of the loan, the amount of the loan in default, i.e., principal, interest, escrow accounts. There is also a place for an email address for the contact person at the lender to receive notifications of their submissions.</i></p>	
<p><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></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p>
<p><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></p>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input checked="" type="checkbox"/> Yes. Multifamily Delinquency and Default Reporting System, 12/20/2007</p>
<p><b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please describe.</p>
<p><b>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes.</p>
<p><b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b></p>	<p>Not applicable.</p>

<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.

<b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	Not applicable.
<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 type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. Web-enabled system, WASS connection through FHA Connection
<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.	

<b>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: 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>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b>	Choose an item. Not applicable. Please describe applicable information sharing governance in place:
<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>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: Security Training
<b>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures</b>	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:

<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.

of PII to individuals/agencies who have requested access to their PII?	<input type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination? <sup>4</sup>	<input checked="" type="checkbox"/> Unknown. <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:  Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High  Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High  Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High

**PRIVACY THRESHOLD ANALYSIS REVIEW**

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

<b>Program Privacy Liaison Reviewer:</b>	<b>Vivian Herring</b>
<b>Date submitted to Program Privacy Office:</b>	<b>January 30, 2019</b>
<b>Date submitted to HUD Privacy Branch:</b>	January 30, 2019
<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>	<b>Cindy Etheridge</b>
<b>Date approved by HUD Privacy Branch:</b>	December 7, 2018
<b>PTA Expiration Date:</b>	This PTA will suffice, however, if this are any changes, an update will be required.

**DESIGNATION**

<b>Privacy Sensitive System:</b>	Choose an item. If "no" PTA adjudication is complete.
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<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.

<b>Category of System:</b>	Choose an item. If "other" is selected, please describe: <a href="#">Click here to enter text.</a>
<b>Determination:</b>	<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.
<b>PIA:</b>	Choose an item. If covered by existing PCLIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>HUD Privacy Branch Comments: The Multifamily Delinquency and Default Report System (MDDR) was established to replace the paper form HUD-92426.</b> <i>Please describe rationale for privacy compliance determination above.</i> <a href="#">Click here to enter text.</a>	

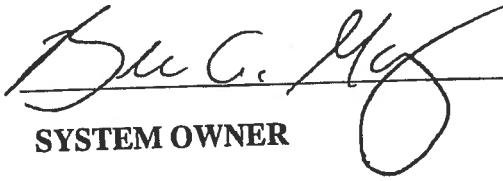
### DOCUMENT ENDORSMENT

<b>DATE REVIEWED:</b>
<b>PRIVACY REVIEWING OFFICIALS NAME:</b>

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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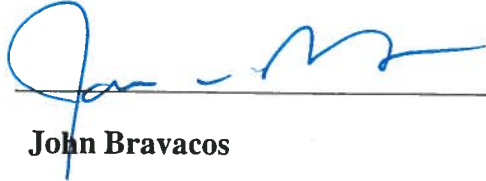
  
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**SYSTEM OWNER**

Brian A. Murray, Acting Director

Office of Asset Management and Portfolio  
Oversight

11/5/18  
Date

  
\_\_\_\_\_

**John Bravacos**

Senior Agency Official for Privacy

Privacy Branch

**OFFICE OF ADMINISTRATION**

1/31/19  
Date