

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Manufactured Housing Survey**

**Office of Policy Development and Research**

**Instruction & Template**

**2/28/2019**

Note to ISSO: The American Housing Survey is funded by HUD and administered by the U.S. Census Bureau. The data collected by the Census Bureau is maintained in a Census Bureau System of Records. As such, it is the Census Bureau's responsibility to conduct a Privacy Impact Assessment.

## PRIVACY THRESHOLD ANALYSIS

The Privacy Threshold Analysis (PTA) is a compliance form developed by the Privacy Branch to identify, across the Department, the use of Personally Identifiable Information (PII). 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
- The risks to the information

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

Complete the form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to Marcus R. Smallwood, Acting Chief Privacy Officer, Privacy Branch, U.S. Department of Housing and Urban Development, 451 7th Street, SW, Room 10139, Washington, DC 20410 or [privacy@hud.gov](mailto:privacy@hud.gov).

Upon its receipt from your program PLO, the HUD Privacy Branch will review the completed form. If it determines that a PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return to the Branch.

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**SUMMARY INFORMATION**

<b>Project or Program Name:</b>	<b>Manufactured Housing Survey</b>		
<b>Program:</b>	<b>Policy Development and Research (PD&amp;R)</b>		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	N/A
<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>	<b>February 28, 2019</b>	<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>	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>	<b>George Carter</b>		
<b>Office:</b>	<b>PD&amp;R</b>	<b>Title:</b>	Survey Statistician, HDAD
<b>Phone:</b>	<b>202-402-5873</b>	<b>Email:</b>	George.R.Carter@hud.gov

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

<b>Name:</b>	N/A		
<b>Phone:</b>	N/A	<b>Email:</b>	N/A

## SPECIFIC PTA QUESTIONS

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

*Please provide a general description of the project and its purpose so a nontechnical person could understand. If this is an updated PTA, please describe the changes and/or upgrades triggering the update to this PTA. If this is a renewal, please state whether there were any changes to the project, program, or system since the last version.*

The Manufactured Housing Survey (MHS) is a survey funded by HUD and administered by the U.S. Census Bureau. The results of the survey are communicated to the public via the internet. No PII is provided to the public. Information is collected from the general public by the Census Bureau. The Census Bureau collects this data on behalf of HUD. The information collected in the MHS is stored in a Census SOR.

**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 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) Manufactured Home Dealers

<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, as 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.

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

*Please provide a specific description of information collected, generated, or retained (such as full names, maiden name, mother's maiden name, alias, Social Security number, passport number, driver's license number, taxpayer identification number, patient identification number, financial account, credit card number, street address, internet protocol, media access control, telephone number, mobile number, business number, photograph image, x-rays, fingerprints, biometric image, template data (e.g., retain scan, well-defined group of people), vehicle registration number, title number, and information about an individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information, etc.*

*The Census Bureau collects the name, address, and telephone number of the respondent.*

Collection of these data is authorized by Title 13, U.S.C., Section 8(b) (see Attachment 4) and Title 12, U.S.C., Section 1701z-1

*Census's legal authority to conduct surveys on behalf of sponsors is found in Title 13, Section 1535.*

**4(a) Does the project, program, or system retrieve information about U.S. Citizens or lawfully admitted permanent resident aliens using personal identifiers?**

- No. Please continue to the next question.  
 Yes. If yes, please list all personal identifiers used:

**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?**

- No. Please continue to the 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

**COMMERCE/CENSUS-4 "Economic Survey Collection." The notice of proposed amendment to this system of records was published in the *Federal Register* on January 26, 2012 (77 FR 4004).**

*Please note: this SORN resides with the Department of Commerce*

**4(c) Has the project, program, or system undergone any significant changes since the SORN?**

- No. Please continue to the next question.  
 Yes. If yes, please describe.

**4(d) Does the project, program, or system use Social Security numbers (SSN)?**

- No.  
 Yes.

4(e) If yes to 4(d), please provide the specific legal authority and purpose for the collection of SSNs.	N/A
4(f) If yes to 4(d), please describe the uses of the SSNs within the project, program, or system.	N/A
<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>	<input type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log of communication traffic is kept, please provide that information here. <b>NOT APPLICABLE</b>
<p>4(h) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</p>	
N/A	

<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<input type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <b>NOT APPLICABLE</b>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p>	<input type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <b>NOT APPLICABLE</b>
<p>6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<input type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please choose from the dropdown menu below: Choose an item. Please describe applicable information sharing governance in place: <b>NOT APPLICABLE</b>
<p>7. Does the project, program, or system provide role-based training for personnel who have access, in addition</p>	<input type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:

<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.

to the annual privacy training required of all HUD personnel?	NOT APPLICABLE
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?	<input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained:  NOT APPLICABLE
9. Is there a FIPS 199 determination? <sup>4</sup>	<input 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  NOT APPLICABLE

### PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

<b>Program Privacy Liaison Reviewer:</b>	Ronald Hill
<b>Date submitted to Program Privacy Office:</b>	
<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>	
Please review and approve. PTA should be sufficient at this time. Data resides with Department of Commerce and not with HUD. Information is collected from the general public by the Census Bureau.	

<sup>4</sup> FIPS 199 (Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems) is used to establish security categories of information systems.



The Census Bureau collects this data on behalf of HUD. The SOR that stores the survey information is a Census SOR.

**(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>	<input 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 Impact Assessment (PIA) 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 PIA, 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>	
<i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

**DOCUMENT ENDORSEMENT**

DATE REVIEWED:
PRIVACY REVIEWING OFFICIAL'S 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.



\_\_\_\_\_  
**SYSTEM OWNER**  
George Carter, Survey Statistician HDAD  
Policy Development and Research

2/28/2019  
Date

\_\_\_\_\_  
**CHIEF PRIVACY OFFICER**  
<<INSERT NAME/TITLE>>  
**OFFICE OF ADMINISTRATION**

\_\_\_\_\_  
Date