

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Moving to Work Amendment to the  
Consolidated Annual Contributions Contract**

**Moving to Work Office  
Public and Indian Housing**

**Instruction & Template  
2577-New**

**December 11, 2018**

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**SUMMARY INFORMATION**

<b>Project or Program Name:</b>	<b>Moving to Work Amendment to the Consolidated Contributions Contract</b>		
<b>Program:</b>	<b>Public and Indian Housing (PIH)</b>		
<b>CSAM Name (if applicable):</b>	<b>N/A</b>	<b>CSAM Number (if applicable):</b>	<b>N/A</b>
<b>Type of Project or Program:</b>	<b>Program</b>	<b>Project or program status:</b>	<b>Operational</b>
<b>Date first developed:</b>	<b>January 1, 2019</b>	<b>Pilot launch date:</b>	<b>N/A</b>
<b>Date of last PTA update:</b>	<b>N/A</b>	<b>Pilot end date:</b>	<b>N/A</b>
<b>ATO Status (if applicable)</b>	<b>Choose an item.</b>	<b>ATO expiration date (if applicable):</b>	<b>N/A</b>

**PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	<b>Christopher Golden</b>		
<b>Office:</b>	<b>Moving to Work Office, PIH</b>	<b>Title:</b>	<b>Housing Innovations Specialist</b>
<b>Phone:</b>	<b>202-402-2413</b>	<b>Email:</b>	<b>Christopher.M.Golden@hud.gov</b>

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

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

<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.  <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 checked="" type="checkbox"/> No. Please continue to next question.  <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><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.  <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.  <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>Click here to enter text.</p>
<p><b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>Click here to enter text.</p>
<p><b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b></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><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></p>	
<p>N/A</p>	

<p><b>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</b></p>	<p><input checked="" type="checkbox"/> No.</p>
---	--

<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.

**PRIVACY THRESHOLD ANALYSIS REVIEW**

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

<b>Program Privacy Liaison Reviewer:</b>	Arlette Mussington
<b>Date submitted to Program Privacy Office:</b>	December 18, 2018
<b>Date submitted to HUD Privacy Branch:</b>	December 18, 2018
<b>Program Privacy Liaison Officer Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
None.	

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

<b>HUD Privacy Branch Reviewer:</b>	Cindy Etheridge
<b>Date approved by HUD Privacy Branch:</b>	Click here to enter a date.
<b>PTA Expiration Date:</b>	This PTA will suffice, however; if there are any changes, an update will be required.

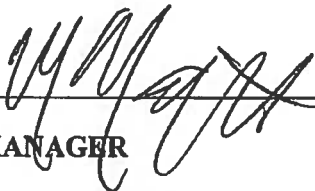
**DESIGNATION**

<b>Privacy Sensitive System:</b>	No 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 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 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.

**DOCUMENT ENDORSMENT**

DATE REVIEWED:
PRIVACY REVIEWING OFFICIALS NAME:

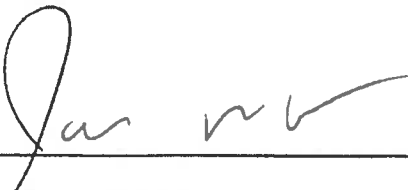
By signing below, you attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.

  
\_\_\_\_\_

**MANAGER**

**Marianne Nazzaro, Director  
Moving to Work Office**

12/18/18  
**Date**

  
\_\_\_\_\_

**John Bravacos**

**Senior Agency Official for Privacy**

**Privacy Branch**

**OFFICE OF ADMINISTRATION**

12/19/18  
**Date**

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Moving to Work (MTW) amendment to the Consolidated Annual Contributions Contract, signed by HUD and the selected Public Housing Authority (PHA) is necessary to authorize 100 new PHA's participation in the MTW demonstration pursuant to the 2016 Appropriations Act. It will allow the PHA to operate under the MTW Operations Notice and its respective selection notice, while retaining the authority of the ACC when not otherwise waived by the notice, and to detail the termination and default actions of HUD should an agency fail in its implementation of the demonstration.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is an authorizing document to be used by HUD and the PHA to authorize 100 new PHA's participation in the MTW demonstration pursuant to the 2016 Appropriations Act.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The amendment will be collected physically for storage with an electronic copy posted on HUD's website.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The document is a legally binding amendment to the ACC and is necessary for an agency to participate in the MTW demonstration.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

This collection will include 50 small PHAs but it has not burden hours.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the amendment to the CACC is not signed, then a PHA can not participate in the MTW demonstration.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more than quarterly;  
**Not Applicable**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;  
**Not Applicable**
- requiring respondents to submit more than an original and two copies of any document;  
**Not Applicable**

- provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

The MTW CACC amendment simply requires the signature of a selected PHA and will impose no burden.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Not applicable.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

There will be no annual cost to the Federal government.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

Not applicable.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The amendment to the CACC will be published on HUD's website as a matter of public record and requires no analysis.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The amendment to the CACC will not require additional submissions and will be binding for the duration of a PHA's participation in the MTW demonstration.

18. Explain each exception to the certification statement identified in item 19.

Not applicable.