U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PRIVACY THRESHOLD ANALYSIS (PTA)

Home Mortgage Disclosure Act (HMDA) Loan/Application Register

Office of Risk Management and Regulatory Affairs
2502-0539

June 7, 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

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:	Home Mortgage Disclosure Act – Data Collection		
Program:	Office of Housing		
CSAM Name (if applicable):	Click here to enter text.	CSAM Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	1975	Pilot launch date:	Click here to enter a date.
Date of last PTA update:	No record of prior PTA.	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Adam Hoffberg		
Office:	ORMRA	Title:	Supervisory Management Analyst
Phone:	202-402-3321	Email:	Adam.Hoffberg@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Choose an item.
An information collection request (ICR) for the Home Mortgage Disclosure Act (HMDA) is being prepared for submission to OMB in association with amended Regulation C (RIN 3170-AA10) , 80 FR 66127 published October 27,2015 and in accordance with 5 CFR 1320.11(f) and 1320.11(h). Regulation C requires lending institutions to report public loan data. HUD will request three years of its approval of the information collection requirements as contained in current Regulation C. The forms are the Loan Application Register (LAR) and Transmittal Sheet (TS).

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[1] (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[2] ☒ Members of the public ☒ HUD employees/contractors (list programs): various research and enforcement 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?
For loan applicants of institutions under HUD's HMDA purview, demographic and loan application data are collected as required by HMDA. Fields include loan case numbers, loan application characteristics,

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[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.

[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.

lender actions in response to applications including reasons for denial, property location down to the Census tract, and applicant demographic and income characteristics.

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?	☐ No. Please continue to next question. ☒ Yes. If yes, please list all personal identifiers used: Date of application and date of action are PII that is collected under HMDA. This data, however, is not shared with the public. Applicant date of birth, mailing or email addresses, telephone numbers and Social Security numbers are not required. Lenders, however, on occasion may submit case number data that appear to be in the form of names or, in rare cases, Social Security numbers.
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 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
4(c)Has the project, program, or system undergone any significant changes since the SORN?	☒ No. Please continue to 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, please provide the specific legal authority and purpose for the collection of SSNs:	Click here to enter text.
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	Click here to enter text.
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? *For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?*	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer this question.
4(h) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	

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[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.

Click here to enter text.

5. Does this project, program, or system connect, receive, or share PII with any other **HUD** programs or systems?	☐ No. ☒ Yes. If yes, please list: Date of application and date of action are PII that is collected under HMDA and may be shared within HUD programs and systems.
6. Does this project, program, or system connect, receive, or share PII with any external (non-**HUD**) partners or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (**MOU**, **MOA**, etc.)?	Choose an item. Please describe applicable information sharing governance in place:
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?	☒ No. ☐ Yes. If yes, please list:
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?	☒ No. What steps will be taken to develop and maintain the accounting: Paper based collection. ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☒ Unknown. ☐ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High Integrity: ☐ Low ☐ Moderate ☐ High

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[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.

	Availability: ☐ Low ☐ Moderate ☐ High

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

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

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	**Cindy Etheridge**
Date approved by HUD Privacy Branch:	June 7, 2018
PTA Expiration Date:	This PTA will suffice, if there are any changes, an update will be required.

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:	**X**☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☐ Privacy Act Statement required. ☐ Privacy and Civil Liberties Impact Assessment (PCLIA) required. ☐ System of Records Notice (SORN) required. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.

	☐ 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: *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.

Adam Hoffberg

_____   __June 7, 2018__
                                                          Date
SYSTEM OWNER

Adam Hoffberg
Office of Risk Management and Regulatory Affairs

_____   6/7/2018
                                                          Date
John Bravacos

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION