

Departmental Clearance & Approval Record

U.S. Department of Housing and Urban Development
Office of Administration

Note to Clearing Offices: If your response has not been received by the Deadline Date, the Originating Office may proceed without it.

| | | | |
|--|--------------------------|---|--------------------------------------|
| 1. Job Control Number(s) 2502-0423 | 2. Classification Number | 3. Type of Action <input checked="" type="checkbox"/> Clearance <input type="checkbox"/> Final Clearance <input type="checkbox"/> Reclearance <input type="checkbox"/> Approval | 4. Deadline Date 3/15/2019 |
|--|--------------------------|---|--------------------------------------|

5. Complete Title
SF Premium Collection Subsystem-Upfront

| | |
|--|---|
| 6. Principal Audience or User <input checked="" type="checkbox"/> HUD Staff <input checked="" type="checkbox"/> Program Participants | 6a. Proposed Distribution (spell-out, do not use codes) |
|--|---|

| | | | |
|--|---|---|---------------------------------|
| 7. Person most familiar with the Document Martha E. Gilcrest | 7a. Organization Code / Office HWAFSU | 7b. Telephone Number 202-402-3331 | 7c. Room Number P3220 |
|--|---|---|---------------------------------|

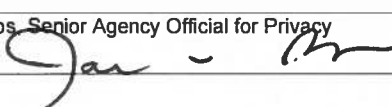
8. Type of Document

New Handbook Handbook Revision New Form Federal Register Notice Regulation Other (specify) **OMB Info Collection**
 Handbook Change Notice Form Revision Publication Special Directive

9. Mark the boxes for the organization(s) reviewing this document. (specify under "other" the HQ/Field staff components within the reviewing offices, e.g., admin officers)

ADM GNMA PIH Chief Proc. Ofcr. S/Departmental EEO CIR Public Affairs Enf. Ctr.
 CPD H OGC CFO S/Labor Relations S/SDBU Chief Information Officer
 ADSFM IG PD&R FHEO S/Lead Hazard Control REAC PECO Other

| | | | |
|--|--|--|---|
| 10. Front-End Risk Analysis <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed | 11. Information Collection Requirements (Paperwork Reduction Act) <input type="checkbox"/> Completed <input checked="" type="checkbox"/> In Process <input type="checkbox"/> Not Needed | 12. Impact on Small Entities (Regulatory Flexibility Act) <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed | 13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Policy Act) <input type="checkbox"/> EIS Required <input type="checkbox"/> FONSI Required <input checked="" type="checkbox"/> FONSI Not Needed |
|--|--|--|---|

| 14. Organization | Signature & Title of Clearing/Approving Official | Date | Concur (no comments) | Concur (comments attached) | Non-Concur (comments attached) |
|------------------|--|---------|----------------------|----------------------------|--------------------------------|
| Admin | John Bravacos, Senior Agency Official for Privacy  | 5/10/19 | ✓ | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

15. List HQ/Field components involved in developing the document (drafts, discussions, etc.)

16. Comments:

| | | |
|--|--|---------------------------------|
| 17. Return this record to Kim N. Sanders | 17a. Telephone Number 202-402-3343 | 17b. Room Number 9116 |
|--|--|---------------------------------|

Instructions

1. Assigned by the originating office's Directives Management Officer (DMO); use the last two digits of the calendar year plus a sequential number plus the office acronym (e.g., 96-01 ADM).
2. For a directive, the proposed three- or four-digit subject classification number which may include a sequential number, revision number, and change number.
3. Self-explanatory.
4. Requests for extensions must be made before the deadline date.
5. The complete title as it will appear on the document.
6. Self-explanatory.
6a. Give description of the proposed distribution, e.g., to HUD Administrative Officers, to Public Housing Agencies, etc. Do not use codes.
7. The person primarily responsible for the document who can discuss proposed modifications.
8. Self-explanatory.
9. Self-explanatory.
10. See Handbook 1840.1, Departmental Management Control Program (formerly Fraud Vulnerability Assessment).
11. See Handbook 2400.3, Reports Analysis and Clearance Process.
12. See Public Law 96-354, Regulatory Flexibility Act.
13. See 24 CFR 50 on compliance with the National Environmental Policy Act.
14. Use for Primary Organization Head (POH) approval to put the document into clearance and, later, to publish the document. Also used for the POH sign-off of reviewing offices.
15. Self-explanatory.
16. Explanations, special instructions, etc.
17. Self-explanatory.

Supporting Statement for Paperwork Reduction Act Submissions

Single Family Premium Collection Subsystem-Upfront OMB Control Number 2502-0423

A. Justification

1. Regulations at 24 CFR 203.259a; 203.280; 203-281; and 203-283 authorize the collection, calculation, and refunds of a one-time mortgage insurance premium (MIP). Lenders use the Single Family Premium Collection Subsystem-Upfront (SFPCS-U) to remit the upfront premium to obtain mortgage insurance for the homeowner.
2. SFPCS-U strengthens HUD's ability to manage and process upfront single-family mortgage insurance premium collections and corrections to submit data. It also improves data integrity for the Single Family Mortgage Insurance Program. FHA approved lenders use Automated Clearing House (ACH) applications for all transmissions with SFPCS-U. The collection of information is used to update HUD's Single Family Insurance System. The information collection is also used in calculating refunds due to former FHA mortgagors when they apply for homeowner refunds of the unearned portion of the mortgage insurance premium, 24 CFR 203.283, as appropriate. Without this information the premium collection/monitoring process would be severely impeded, and program data would be unreliable. In general, lenders use the ACH applications to remit the upfront premium through SFPCS-U to obtain mortgage insurance for the homeowner.

There is a decrease in the number of lenders as lenders merge into other companies and others opt out of doing FHA business while the numbers of refinances have increased due to the low interest rates.

3. Pay.gov was developed to meet the commitment of the United States federal government and the U.S. Department of the Treasury's Financial Management Service to process collections electronically using Internet technologies. Pay.gov satisfies the demands of agencies and consumers for electronic alternatives by providing the ability to complete forms, make payments, and submit queries 24 hours a day electronically. This modification of the existing process was made in response to the Department of the Treasury's mandate for all agencies to switch from their current lockbox services to Treasury's Pay.gov collection service.
4. The number of respondents is 3,153 lenders sign up and use the ACH applications) and the frequency of response is on occasion, at the mortgage closing. Since remittances are made through ACH the upfront remittance is submitted electronically and there is no paperwork to complete and mail-in. There are approximately 27,718 responses per year.
5. No duplicate data exists. The data is not available from other sources.
6. There is no impact on small businesses or other small entities.
7. The information collection is required of the remitting mortgagee and shall accompany all upfront payments sent to HUD through ACH and collected and reported by SFPCS-U. If this information collection is not conducted or is conducted less frequently, the consequence to the single-family mortgage insurance program is that incomplete and/or inaccurate data may delay endorsement of the FHA case involved.

Mortgagees are required by 24 CFR 203.280 to provide the required information when the upfront mortgage insurance premium is due to the Department, which is the time of settlement when the FHA mortgage closes.

8. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on XXXX (Volume XX, Number XX, Page XXXX). Comments...
9. No gift or payment is provided to respondents.
10. Confidentiality is not an issue for the data involved.
11. No questions of a sensitive nature are involved.

12. Estimate of public burden:

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|------------------------|-----------------------|-----------------------|---------------------|---------------------|---------------------|--------------------------|-------------|
| MIP's | 3,153 | 12 | 27,718 | .15 | 4,157 | \$24.00 | \$99,768 |

Hourly rate is based on an estimate of the annual salary of the lender's clerical staff at \$51,840.

13. There are no additional costs to the respondents.
14. Federal Government Costs: None. TREASURY ESTIMATED WE SAVED THEM \$4 MILLION ANNUALLY.
15. This is a revision of a currently approved collection. There is an increase in the number of lenders to account for all FHA-approved lenders. Furthermore, the previous years estimate burden has been adjusted to correct calculation error. Additionally, there has been growth in the number of refinance loans due to the lower interest rates. Finally, salary has been adjusted for this responsibility
16. The results of the information collection will not be published.
17. We are not seeking approval to avoid displaying the expiration date.
18. There are no exceptions to the certification statement identified in item 19.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.

Supporting Statement for Paperwork Reduction Act Submissions

Single Family Premium Collection Subsystem-Upfront OMB Control Number 2502-0423

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.

Regulations at 24 CFR 203.259a; 203.280; 203-281; and 203-283 authorize the collection, calculation, and refunds of a one-time mortgage insurance premium (MIP). Lenders use the Single Family Premium Collection Subsystem-Upfront (SFPCS-U) to remit the upfront premium to obtain mortgage insurance for the homeowner.

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.

SFPCS-U strengthens HUD's ability to manage and process upfront single-family mortgage insurance premium collections and corrections to submit data. It also improves data integrity for the Single Family Mortgage Insurance Program. FHA approved lenders use Automated Clearing House (ACH) applications for all transmissions with SFPCS-U. The collection of information is used to update HUD's Single Family Insurance System. The information collection is also used in calculating refunds due to former FHA mortgagors when they apply for homeowner refunds of the unearned portion of the mortgage insurance premium, 24 CFR 203.283, as appropriate. Without this information the premium collection/monitoring process would be severely impeded, and program data would be unreliable. In general, lenders use the ACH applications to remit the upfront premium through SFPCS-U to obtain mortgage insurance for the homeowner.

There is a decrease in the number of lenders as lenders merge into other companies and others opt out of doing FHA business while the numbers of refinances have increased due to the low interest rates.

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.

Pay.gov was developed to meet the commitment of the United States federal government and the U.S. Department of the Treasury's Financial Management Service to process collections electronically using Internet technologies. Pay.gov satisfies the demands of agencies and consumers for electronic alternatives by providing the ability to complete forms, make payments, and submit queries 24 hours a day electronically. This modification of the existing process was made in response to the Department of the Treasury's mandate for all agencies to switch from their current lockbox services to Treasury's Pay.gov collection service.

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.

No duplicate data exists. The data is not available from other sources.

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.

There is no impact on small businesses or other small entities.

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.

The information collection is required of the remitting mortgagee and shall accompany all upfront payments sent to HUD through ACH and collected and reported by SFPCS-U. If this information collection is not conducted or is conducted less frequently, the consequence to the single-family mortgage insurance program is that incomplete and/or inaccurate data may delay endorsement of the FHA case involved.

Mortgagees are required by 24 CFR 203.280 to provide the required information when the upfront mortgage insurance premium is due to the Department, which is the time of settlement when the FHA mortgage closes.

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 often than quarterly;
Lenders/Respondents must remit payment each time they wish to endorse a case. Waiting up to three months (a quarter) to endorse a case would delay the endorsement of each case.

* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
Lenders/Respondents are not required to prepare a written response to a collection of information in fewer than 30 days after receipt.

* requiring respondents to submit more than an original and two copies of any document; *
requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
Lenders/Respondents are not required to submit more than an original and two copies of any document.

* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
Lenders/Respondents are not required to participate in statistical studies.

* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
Lenders/Respondents are not required to use statistical data classification.

* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
Lenders/Respondents are not required to make a pledge of confidentiality that is not supported by authority established in statute or regulation.

* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.
Lenders/Respondents are not required to submit proprietary trade secrets or confidential information.

8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on XXXX (Volume XX, Number XX, Page X).
Comments....

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No gift or payment is provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Confidentiality is not an issue for the data involved.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are involved.

12. Provide estimates of the hour burden of the collection of information. The statement should:

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|------------------------|-----------------------|-----------------------|---------------------|---------------------|---------------------|--------------------------|-------------|
| MIP's | 3,153 | 12 | 27,718 | .15 | 4,157 | \$24.00 | \$99,768 |

Hourly rate is based on an estimate of the annual salary of the lender's clerical staff at \$51,840.

* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

* 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.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no additional costs to the respondents.

* 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 and 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 collections 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.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There are no additional costs to the respondents.

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

This is an extension of a currently approved collection. There are no changes to the program. There is an increase in the number of lenders to account for all FHA-approved lenders. Additionally, there has been growth in the number of refinance loans due to the lower interest rates. HUD has decreased its estimate of burden hours per response because the transactions are all electronic.

16. For collections 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 results of the information collected will not be published.

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.

We are not seeking approval to avoid displaying the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement identified in item 19.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

This information collection does not employ statistical methods.

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The potential universe is 3,153 because that is the number of active FHA lenders with the ability to originate cases and make upfront payments.

Expected response rate is variable depending on the number of cases originated each month.

Additionally, each lender may pay more than one case in each payment.

Additionally, the number of active lenders/respondents changes month to month.

In FY 2018, the actual response rate was 27,718 responses/payments.

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,
- * Estimation procedure,
- * Degree of accuracy needed for the purpose described in the justification,
- * Unusual problems requiring specialized sampling procedures, and
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

An estimation procedure was used. The current collection's responses per annum is based on the prior year's actual number of responses. There are no indications that the current collection should decrease or increase from last year.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

A lender/respondent must make payment to have a case endorsed. If the payment is not made, the case will not be endorsed.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

No tests of procedures or methods are to be undertaken.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Martha. Emily Gilcrest
Chief, Single Family Insurance Operations Branch
202-402-3331
Martha.e.gilcrest@hud.gov

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Single Family Premium Collections Subsystem-
Upfront & OMB Control Number 2502 0423
Office of Housing**

[SFIOD]

[December 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: (OMB Title & Control Number) | Single Family Premium Collection Subsystem- Upfront OMB 2502-0423 | | |
| Program: | Office of Housing | | |
| CSAM Name (if applicable): | A80R – SF Premiums Collections Subsystem- Upfront | CSAM Number (if applicable): | 1021 |
| Type of Project or Program: | IT System | Project or program status: | Existing |
| Date first developed: | April 7, 1997 | Pilot launch date: | N/A |
| Date of last PTA update: | 2016 | Pilot end date: | N/A |
| ATO Status (if applicable) | Complete | ATO expiration date (if applicable): | March 19, 2020 |

PROJECT OR PROGRAM MANAGER

| | | | |
|----------------|-----------------------|---------------|--|
| Name: | Deirdre Lanier | | |
| Office: | HWAF | Title: | HUD Project Leader |
| Phone: | 202-402-7478 | Email: | Deirdre.H.Lanier@hud.gov |

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

| | | | |
|---------------|----------------------|---------------|--|
| Name: | Tracene Davis | | |
| Phone: | 202-402-5748 | Email: | Tracene.L.Davis@hud.gov |

SPECIFIC PTA QUESTIONS

| |
|---|
| <p>1. Reason for submitting the PTA: Choose an item.</p> <p><i>Please provide a general description of the project and its purpose so a non-technical person could understand. If this is an updated PTA, please describe what 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.</i></p> <p><i>Also, please be sure to list forms and state the purpose of each form.</i></p> <p>Single Family Premium Collection Subsystem-Upfront SFPCS-U (A80R) is a major HUD system that was implemented in April of 1997 as a replacement for the One-Time Mortgage Insurance premium System. The system automates the collection of Federal Housing Administration (FHA) Upfront mortgage insurance premiums (MIPs). The SFPCS-U validates the premium amount remitted, assesses any additional late penalty and interest due, suspends payments with incorrect/inconsistent data, reconciles premiums paid between the underwriting and insurance in force systems, refunds excess premiums, and provides an audit trail by case through detailed accounting and case history entries. SFPCS-U receives the initial upfront premium payment to secure the mortgage insurance from HUD-to-lenders making Federal Housing Administration (FHA) loans.</p> |
|---|

| | |
|--|---|
| <p>2. Does this system employ the following technologies?</p> <p><i>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.</i></p> | <p><input type="checkbox"/> Social Media</p> <p><input checked="" type="checkbox"/> Web portal¹ (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input type="checkbox"/> Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)</p> <p><input type="checkbox"/> None of these</p> |
|--|---|

| | |
|---|--|
| <p>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</p> <p><i>Please check all that apply.</i></p> | <p><input type="checkbox"/> This program collects no personally identifiable information²</p> <p><input type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> |
|---|--|

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.

| | |
|--|--|
| | <input type="checkbox"/> Employees of other federal agencies <input checked="" type="checkbox"/> Other (e.g. business entity) This system contains no PII |
|--|--|

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, 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 date, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information) and etc.

SFPCS-U is tasked with collection, reconciliation, refunding, and accounting processes for the Single Family Insurance Operations Division of the Office of Financial Services. The system only collects FHA Case number and amount due. It does not collect any personal, individual data.

| | |
|--|---|
| 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? | <input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> 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? | <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 |
| 4(c) Has the project, program, or system undergone any significant changes since the SORN? | <input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe. |
| 4(d) Does the project, program, or system use Social Security Numbers (SSN)? | <input checked="" type="checkbox"/> No. <input type="checkbox"/> 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. |

| | |
|--|--|
| <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> | <p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If a log kept of communication traffic, please answer this question.</p> |
| <p>4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p> | |
| <p>No.</p> | |

| | |
|---|---|
| <p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p> | <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p> |
| <p>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p> | <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p> |
| <p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p> | <p>Choose an item.</p> <p>Please describe applicable information sharing governance in place:</p> |
| <p>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?</p> | <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p> |
| <p>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?</p> | <p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p> |

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.

| | |
|---|--|
| <p>9. Is there a FIPS 199 determination?⁴</p> | <p><input type="checkbox"/> Unknown.</p> <p><input type="checkbox"/> No.</p> <p>X Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: X Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: X Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: X Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> |
|---|--|

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

| | |
|--|--------------------------|
| Program Privacy Liaison Reviewer: | Kim Sanders |
| Date submitted to Program Privacy Office: | February 26, 2019 |
| Date submitted to HUD Privacy Branch: | March 4, 2019 |
| Program Privacy Liaison Officer Recommendation: | |
| <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)

| | |
|---|--|
| HUD Privacy Branch Reviewer: | Cindy Etheridge |
| Date approved by HUD Privacy Branch: | March 28, 2019 |
| PTA Expiration Date: | This PTA will suffice, however, if there are any changes an update will be required. |

DESIGNATION

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.

| | |
|---|--|
| 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: | <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. |
| PIA: | Choose an item. If covered by existing PCLIA, please list: Click here to enter text. |
| SORN: | System covered by existing SORN If covered by existing SORN, please list: Click here to enter text. |
| HUD Privacy Branch Comments: There are no forms used in this collection. | |
| <i>Please describe rationale for privacy compliance determination above.</i> | |
| 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.

Antie Chin

12/19/2018

Date

SYSTEM OWNER

Director

Office of Financial Service

Single Family Asset Management

John Bravacos

5/10/19

Date

John Bravacos

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION

