

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Enterprise Income (EIV) Verification System
Debts Owed to Public Housing Agencies and
Terminations**

**Office of Public and Indian Housing
Real Estate Assessment Center**

April 2019

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:

Marcus Smallwood, Acting, Chief Privacy Officer
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: | Debts Owed to Public Housing Agencies and Termination | | |
| Program: | <input type="text"/> | | |
| CSAM Name (if applicable): | Enterprise Income Verification System | CSAM Number (if applicable): | 1003 |
| Type of Project or Program: | <input type="text"/> | Project or status: | <input type="text"/> |
| Date first developed: | October 28, 2002 | Pilot launch date: | N/A |
| Date of last PTA update: | April 1, 2016 | Pilot end date: | N/A |
| ATO Status (if applicable) | <input type="text"/> | ATO expiration date (if applicable): | March 30, 2022 |

PROJECT OR PROGRAM MANAGER

| | | | |
|----------------|----------------------|---------------|-------------------------------|
| Name: | Rochelle Katz | | |
| Office: | PIH/EIV | Title: | Acting Program Manager |
| Phone: | 202-475-4967 | Email: | Rochelle.Katz@hud.gov |

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

| | | | |
|---------------|---------------------|---------------|-------------------------------|
| Name: | Dallas Blair | | |
| Phone: | 202-475-8699 | Email: | Dallas.C.Blair@hud.gov |

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA:

The EIV Debts Owed module is a national repository of families that owe a debt to a PHA and/or have been terminated from a federally assisted housing program. Only PHA authorized EIV users access the information in the module when determining a family’s suitability for rental assistance. PHAs, in accordance with their policies, may deny Federal housing assistance to families who either: 1) owe a debt to a PHA; or 2) have previously been unable to comply with HUD program requirements.

At the end of a family’s participation in a Federal housing assistance program (EOP), PHAs enter the following information in the Debts Owed module, as applicable:

1. Amount of debt owed by the former tenant to a PHA;
2. Indication of executed repayment agreement;
3. Indication of bankruptcy filing;

The reason for an adverse termination of the family from a Federally assisted housing program.

Pursuant to 24 CFR 5.233, these PHAs are required to use HUD’s Enterprise Income Verification (EIV) system to verify employment and income information of program participants and to reduce administrative and subsidy payment errors. PHAs also use the information in the Debts Owed module, which identifies families who no longer participate in assisted housing programs due to adverse termination of tenancy and/or assistance, and owe a debt to a PHA, in determining eligibility for assistance and continued program participation pursuant to 24 CFR 982.552 and 960.203.

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 portal² (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

² 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.

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| <p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? Please check all that apply.</p> | <input type="checkbox"/> This program collects no personally identifiable information ³ <input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> HUD employees/contractors (list programs): <input type="checkbox"/> Contractors working on behalf of HUD <input type="checkbox"/> Employees of other federal agencies <input type="checkbox"/> Other (e.g. business entity) |
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| <p>4. What specific information about individuals is collected, generated or retained?</p> | |
| <p>What information about individuals could be collected, generated or retained?</p> <ol style="list-style-type: none"> 1. Amount of debt owed by the former tenant to a PHA; 2. Indication of executed repayment agreement; 3. Indication of bankruptcy filing; 4. The reason for an adverse termination of the family from a Federally assisted housing program. | |
| <p>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?</p> | <input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used: |
| <p>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?</p> | <input type="checkbox"/> No. Please continue to next question. <input checked="" 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 Enterprise Income Verification System (EIV), HUD/PIH-5 Document Citation: 74 45235 Published: 9/1/2009 |
| <p>4(c) Has the project, program, or system undergone any significant changes since the</p> | <input checked="" type="checkbox"/> No. Please continue to next question. |

³ 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.

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| SORN? | <input type="checkbox"/> Yes. If yes, please describe. |
| 4(d) Does the project, program, or system use Social Security Numbers (SSN)? | <input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. |
| 4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs: | 24 CFR§5.216, (b) Disclosure required of assistance applicants. Each assistance applicant must submit the following information to the processing entity when the assistance applicant’s eligibility under the program involved is being determined. (1) The complete and accurate SSN assigned to the assistance applicant and to each member of the assistance applicant’s household. |
| 4(f) If yes, please describe the uses of the SSNs within the project, program, or system: | This information is captured on the form HUD 50058, Family Report (OMB approval number 2577-0083, expiring 5/31/2020), on which families provide the confidential information that respondents may use when entering data in the EIV Debts Owed module. It includes a Privacy Act statement advising the family that the information on the form (PII) is confidential and protected by the Privacy Act of 1974 (5 USC 552a). The Privacy Act statement also informs the family that the collection is mandatory and the information requested is required to obtain and retain benefits pursuant to 24 CFR part 5 subpart B. |
| 4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i> | <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. |
| 4(h) If header or payload data⁴ is stored in the communication traffic log, please detail the data elements stored. | |
| N/A | |

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| 5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems? | <input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: PIC, TRACS |
| 6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems? | <input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: SSA & HHS |

⁴ 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.

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| <p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p> | <div style="border: 1px solid black; width: 100px; height: 20px; margin-bottom: 10px;"></div> <p>Please describe applicable information sharing governance in place:</p> <p>Existing Computer Matching Agreements with the Social Security Administration and the Department of Health and Human Services</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 type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>Initial EIV System Training, Updated EIV System Training, Annual Security Awareness Training</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 type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p><input checked="" type="checkbox"/> Yes. In what format is the accounting maintained: Log all access to EIV database.</p> |
| <p>9. Is there a FIPS 199 determination?⁵</p> | <p><input type="checkbox"/> Unknown.</p> <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High</p> |

PRIVACY THRESHOLD ANALYSIS REVIEW

⁵ 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.

(TO BE COMPLETED BY PROGRAM PLO)

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| 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: <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)

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| HUD Privacy Branch Reviewer: | Click here to enter text. |
| Date approved by HUD Privacy Branch: | Click here to enter a date. |
| PTA Expiration Date: | Click here to enter a date. |

DESIGNATION

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|----------------------------------|---|
| Privacy Sensitive System: | <input type="text"/> If "no" PTA adjudication is complete. |
| Category of System: | <input type="text"/> If "other" is selected, please describe: Click here to enter text. |
| Determination: | <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 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: | <input type="text"/> If covered by existing PCLIA, please list: Click here to enter text. |
| SORN: | <input type="text"/> 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

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|-----------------------------------|
| 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.

SYSTEM OWNER

Rochelle Katz, Acting Program Manager
Department of Housing and Urban Development
Real Estate Assessment Center
Enterprise Income Verification Center

Date

CHIEF PRIVACY OFFICER

<<INSERT NAME/TITLE>>

OFFICE OF ADMINISTRATION

Date