

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Manufactured Housing Construction and
Safety Standards Act**

**Label Fee Collection and Reporting
OMB Collection 2502-0233**

Office of Manufactured Housing Programs

March 19, 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:

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:	Manufactured Housing Construction and Safety Standards Reporting		
Program:	Office of Housing		
CSAM Name (if applicable):	Weblabels (contractor developed and maintained)	CSAM Number (if applicable):	N.A.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	unknown	Pilot launch date:	unknown
Date of last PTA update:	unknown	Pilot end date:	unknown
ATO Status (if applicable)	Not started	ATO expiration date (if applicable):	N.A.

PROJECT OR PROGRAM MANAGER

Name:	Mr. Leo S. Huott		
Office:	Office of Manufactured Housing Programs	Title:	General Engineer
Phone:	202-402-4538	Email:	leo.s.huott@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	NA		
Phone:	NA	Email:	NA

SPECIFIC PTA QUESTIONS

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

Office of Manufactured Housing Programs is renewing the following forms that collect information. There are no changes from the previous renewal. The collection is necessary for HUD to implement its oversight and regulatory authority for manufactured home design and production. This information collection is used in conjunction with certification labels, which are 2-inch x 4-inch metal tags permanently attached to each section of manufactured homes to provide a unique identifying number to each home produced under the Manufactured Home Construction and Safety Standards.

Respondents are both approved Production Inspection Primary Inspections Agencies (IPIAs) as described in 24 CFR 3282.362, and producers of manufactured homes as defined in 24 CFR 3282.7. HUD issues certification labels to HUD-approved IPIA agencies and those certification labels are re-distributed to manufacturers in exchange for a fee. IPIAs issue the labels to manufacturers that they service. The information collected for each certification label provides the Department with information that will help identify a manufactured home after it leaves the plant and to ensure that the certification label fee has been paid. The information will facilitate any recall or safety-related defect campaigns and provide the data that is needed to pay required fees or credits for program participants in the various states where such homes are manufactured and located.

All forms are available via download from HUD's website at:

https://www.hud.gov/program_offices/administration/hudclips/forms. Links to each form are provided within the narrative for each form. HUD is also able to email any needed forms upon request.

Form HUD-101, IPIA Request for Labels, is used by the IPIA to obtain certification labels from HUD. (<https://www.hud.gov/sites/documents/101.PDF>) 67% of respondents are state agencies; 33% of respondents are private businesses. Form HUD-101 is completed as labels are ordered by each of HUD's approved IPIA agencies. The completed forms are submitted to HUD by way of HUD's contractor via email. Upon receipt the orders are reviewed and completed when approved; the forms are archived digitally and maintained by HUD's contractor.

Form HUD-203, Lost Label Report, is used by the IPIA to report any lost labels or salvaged manufactured home units. (<https://www.hud.gov/sites/documents/203.PDF>) Form HUD-203 are completed only when a HUD-approved IPIA discovers that a certification has been lost or have been found to be applied to a wrecked or salvaged unit. The completed forms are submitted to HUD by way of HUD's contractor via email. Upon receipt the forms are archived digitally and maintained by HUD's contractor. The information collected here is used to identify lost labels and labels applied to salvaged units so that they can be noted as such in HUD records. This form must be submitted within 5 days of the discovery of missing labels. 67% of respondents are state agencies; 33% of respondents are private businesses.

Form HUD-203B, Damaged Label Report, is used by the manufacturer to return damaged labels to the IPIA, and by the IPIA to assign replacement labels to the manufacturer. (<https://www.hud.gov/sites/documents/203B.PDF>). Form HUD-203B are completed only when a

HUD-approved IPIA reports that a previously issued certification label is being replaced because the original label has been damaged. The completed forms are submitted to HUD by way of HUD's contractor via email. Upon receipt the forms are archived digitally and maintained by HUD's contractor. 67% of respondents are state agencies; 33% of respondents are private businesses.

Form HUD-301, Request and Payment for Labels, is used by the manufacturer to request and pay for the needed labels. (<https://www.hud.gov/sites/documents/301.PDF>). Form HUD-301 is first completed by a home manufacturing plant as labels are ordered, then reviewed and completed by the respective IPIA for that manufacturing plant. The completed forms are submitted to HUD by way of HUD's contractor via email. Upon receipt the forms are archived digitally and maintained by HUD's contractor. This form is prepared by the manufacturer and submitted with payment to Pay.gov and then a copy of the form and payment receipt is sent by the manufacturer to the IPIA that will provide the physical labels. The IPIA then completes the form and provides the information to HUD's Monitoring and Inspection Contactor. The information on the HUD-301 is needed by HUD and HUD's monitoring agency to track the request, approval, and application of authorized labels. 67% of respondents are state agencies; 33% of respondents are private businesses.

Form HUD-302, HUD Manufactured Home Monthly Production Report, is used by manufacturers to provide information to account for the production and shipment of homes and the calculation of monthly payments to the state partner agencies as required. (<https://www.hud.gov/sites/documents/302.PDF>). Form HUD-302 is completed by a home manufacturing plant as labels are applied to manufactured housing units produced. The completed forms are submitted digitally through each plant's IPIA via email or direct transfer via HUD's contractor database for HUD-302 information. Upon receipt the forms are archived digitally and maintained by HUD's contractor. 100% of respondents are private businesses.

Form HUD-303, Refunds Due Manufacturer, is used by a manufacturer to request a refund for unused labels when a plant closes and has no parent or sister company to take a credit for fees already paid. (<https://www.hud.gov/sites/documents/303.PDF>). Form HUD-303 is first completed by a home manufacturing plant and then submitted to and through the IPIA for that manufacturing plant. The completed forms are submitted digitally through each IPIA via email to HUD's contractor. Upon receipt the forms are archived digitally and maintained by HUD's contractor. The IPIA completes the form and provides the information to HUD. 67% of respondents are state agencies; 33% of respondents are private businesses.

Form HUD-304, Adjustment Report, Monthly Production Report, is used by manufacturers to report any adjustments to previously submitted monthly production reports. (<https://www.hud.gov/sites/documents/304.PDF>). Form HUD-304 is first completed by a home manufacturing plant and then submitted to and through the IPIA for that manufacturing plant. The completed forms are submitted digitally through each IPIA via email to HUD's contractor. Upon receipt the forms are archived digitally and maintained by HUD's contractor. 100% of respondents are private businesses..

<p>2. Does this system employ the following technologies? <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 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 checked="" type="checkbox"/> None of these</p>
--	---

<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <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 checked="" type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input checked="" type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p> <p><input checked="" type="checkbox"/> Other (e.g. business entity)</p>
---	--

<p>4. What specific information about individuals is collected, generated or retained?</p>	
<p><i>Names of manufacturer designated personnel reporting information.</i></p>	
<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>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p>
<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>	<p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><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>

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.

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:	Not applicable.
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	Not applicable.
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 data³ is stored in the communication traffic log, please detail the data elements stored.	
NA	

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> 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. Not applicable. Please describe applicable information sharing governance in place:

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>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. <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: <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

<p>Program Privacy Liaison Reviewer:</p>	<p>Sherina Greene</p>
<p>Date submitted to Program Privacy Office:</p>	<p>February 25, 2019</p>
<p>Date submitted to HUD Privacy Branch:</p>	<p>February 25, 2019</p>
<p>Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i> Click here to enter text.</p>	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

<p>HUD Privacy Branch Reviewer:</p>	<p>Cindy Etheridge</p>
--	-------------------------------

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.

Date approved by HUD Privacy Branch:	March 19, 2019
PTA Expiration Date:	PTA will suffice, however, 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:	<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:	Choose an item. If covered by existing SORN, please list: Click here to enter text.
HUD Privacy Branch Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSEMENT

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.

Jason C. McJury

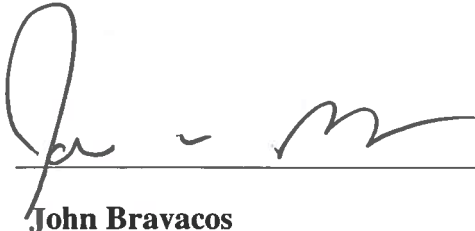
10/22/2018

Date

SYSTEM OWNER

<< INSERT NAME/TITLE >>

<< INSERT PROGRAM OFFICE >>



John Bravacos

3/25/19

Date

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION