

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Comprehensive Transactional Forms  
Supporting FHA's Section 242 Program**

**OMB No.: 2502-0602**

**Office of Healthcare Programs  
Office of Hospital Facilities**

**Instruction & Template**

**November 27, 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](mailto: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**

<b>Project or Program Name:</b>	<b>Comprehensive Transactional Forms Supporting FHA's Section 242 Program for Hospitals</b>		
<b>Program:</b>	<b>Office of Housing</b>		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Existing</b>
<b>Date first developed:</b>	<b>February 2, 2012</b>	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update:</b>	<b>May 5, 2016</b>	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	N/A	<b>ATO expiration date (if applicable):</b>	N/A

**PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	<b>Glorianna Y. Peng</b>		
<b>Office:</b>	<b>Office of Hospital Facilities, Office of Healthcare Programs, Office of Housing</b>	<b>Title:</b>	<b>Senior Advisor for Healthcare Programs</b>
<b>Phone:</b>	<b>202-402-2122</b>	<b>Email:</b>	<b>Glorianna.Y.Peng@hud.gov</b>

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

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

## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: Renewal PTA

The collection is a comprehensive set of HUD forms needed for processing applications and loan closings for FHA mortgage insurance under the Section 242 Hospital Mortgage Insurance Program, for ongoing asset management of those FHA-insured facilities, and other information related to these facilities for loan modifications, construction projects, and physical and environmental reviews. This information is requested and is used by the Office of Healthcare Facilities (OHF) and Office of Architecture and Engineering (OAE) within FHA's Office of Healthcare Programs (OHP).

Information is collected in forms submitted by hard copy and electronically via CD/DVD or flash drive, then converted to PDF. Other forms may be submitted in hard copy or via email attachment. In the past the PDFs were saved to the J drive or on SharePoint, however going forward, we will be saving them in HUD's TransAccess (our NARA compliant document storage solution). For more information about TransAccess please see the following website (<http://www.penielsolutions.com/case-studies/document-management-solution-federal-agency/>).

The information collected is information needed by HUD to review Section 242 applications to determine the eligibility of applicant hospitals for FHA mortgage insurance, underwrite the loans, ensure that the collateral securing each loan is adequate, and capture administrative data to be used in determining whether the Program meets its stated goals and management objectives. Information is also collected to process initial/final endorsement of loans that qualify for Section 242 hospital mortgage insurance. Information is also reported for ongoing asset management of FHA-insured facilities as required by regulations. Additional information related to loan modifications, construction projects, and physical and environmental reviews is collected if applicable.

This collection is needed to update and renew the current collection finalized by OMB on 8/19/2016. There are three changes to this collection: (1) HUD-9250-OHF (Funds Authorizations) will be removed from the collection; and two new forms are being added to this collection (2) HUD-92266-OHF (Application for Transfer of Physical Assets) and (3) HUD-92476B-OHF (Escrow Agreement for the Release of Collateral).

The following forms remain unchanged for this collection:

HUD-91070-OHF, HUD-91071-OHF, HUD-91073-OHF, HUD-91111-OHF, HUD-91725-OHF, HUD-92013-OHF, HUD-92023-OHF, HUD-92070-OHF, HUD-92080-OHF, HUD-92117-OHF, HUD-92205-OHF, HUD-92223-OHF, HUD-92322-OHF, HUD-92330-OHF, HUD-92330A-OHF, HUD-92403-OHF, HUD-92403A-OHF, HUD-92415-OHF, HUD-92422-OHF, HUD-92434-OHF, HUD-92441-OHF, HUD-92442-OHF, HUD-92448-OHF, HUD-92452A-OHF, HUD-92452-OHF, HUD-92455-OHF, HUD-92456-OHF, HUD-92464-OHF, HUD-92466-OHF, HUD-92476-OHF, HUD-92476A-OHF, HUD-92479-OHF, HUD-92554-OHF, HUD-92576-OHF, HUD-93305-OHF, HUD-94000-OHF, HUD-94001-OHF, HUD-94128-OHF

### 2. Does this system employ the following technologies?

*If you are using these technologies and want coverage under the respective PIA for that*

- Social Media
- Web portal<sup>1</sup> (e.g., SharePoint)
- Contact Lists

<sup>1</sup> 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.

<i>technology, please stop here and contact the HUD Privacy Branch for further guidance.</i>	<input type="checkbox"/> Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD) <input checked="" type="checkbox"/> None of these
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<b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> <i>Please check all that apply.</i>	<input checked="" type="checkbox"/> This program collects no personally identifiable information <sup>2</sup> <input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> HUD employees/contractors (list programs): <i>Office of Healthcare Programs</i> <input type="checkbox"/> Contractors working on behalf of HUD <input type="checkbox"/> Employees of other federal agencies <input checked="" type="checkbox"/> Other (e.g. business entity)
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**4. What specific information about individuals is collected, generated or retained?**

The collection requires non-personally identifiable information (non-PII) be submitted such as names of the business authorizing officials, the business phone numbers, the business addresses, and the business contact information of relevant parties needed to certify or review information. Though individuals may be the principal participants in these entities, the data they provide is related to their business relationship(s) rather than their personally identifiable information.

<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>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
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<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>	<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
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<sup>2</sup> 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.

<b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b>	<input type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe. N/A
<b>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b>	N/A
<b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	N/A
<b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b>  <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.
<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>	
N/A	

<b>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
<b>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b>	N/A Please describe applicable information sharing governance in place:
<b>7. Does the project, program, or system provide role-based training for</b>	<input checked="" type="checkbox"/> No.

<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.

personnel who have access in addition to annual privacy training required of all HUD personnel?	<input type="checkbox"/> 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?	<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:
9. Is there a FIPS 199 determination? <sup>4</sup>	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:  Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High  Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High  Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High

### PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

<b>Program Privacy Liaison Reviewer:</b>	Nadine Smith
<b>Date submitted to Program Privacy Office:</b>	November 6, 2018
<b>Date submitted to HUD Privacy Branch:</b>	March 26, 2019
<b>Program Privacy Liaison Officer Recommendation:</b>	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Click here to enter text.	
Recommend removal of Privacy Act Statement from form HUD-91070-OHF, unless both the business owners personal and business email, home, telephone number is collected	

<sup>4</sup> 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 THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	June 1, 2018
PTA Expiration Date:	This PTA will suffice, however; if there are any changes, an update will be required.

DESIGNATION

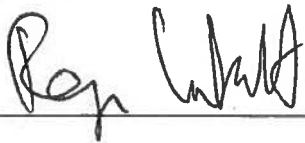
Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	<input checked="" type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance 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.
<b>HUD Privacy Branch Comments: The information is collected from lenders/mortgage bankers, borrowers/hospital management officials, attorneys, general contractors/construction managers, architects/engineers, agents and others involved in hospital projects, which may include local government entities and other third parties. There are two new forms being added to this collection: HUD-92476B and HUD-92266-OHF. HUD-9250-OHF will be removed from this collection.</b>	
<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.



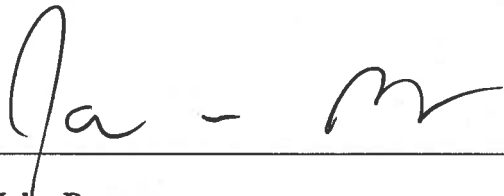
11-27-18  
Date

**SYSTEM OWNER**

**Roger Lukoff**

**Deputy Assistant Secretary for Healthcare Programs**

**Office of Healthcare Programs  
OFFICE OF HOUSING**



3/27/19  
Date

**John Bravacos**

**Senior Agency Official for Privacy**

**Privacy Branch**

**OFFICE OF ADMINISTRATION**

