

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Housing Counseling Program  
OMB Control Number 2502-0261**

**Office of Housing Counseling**

**September 24, 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>PRA Collection 2502-0261: The Housing Counseling Program</b>         |   |                 |
| <b>Program:</b>                    | <b>Office of Housing</b>  |   |                 |
| <b>CSAM Name (if applicable):</b>  | <b>Housing Counseling System/Client Activity Reporting (CAR) System</b> | <b>CSAM Number (if applicable):</b>         | <b>Unknown</b>  |
| <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>Unknown</b>  | <b>Pilot launch date:</b>                   | <b>N/A</b>      |
| <b>Date of last PTA update:</b>    | <b>This is the first PTA. Last submission was an IPA.</b>               | <b>Pilot end date:</b>                      | <b>N/A</b>      |
| <b>ATO Status (if applicable)</b>  | <b>N/A</b>  | <b>ATO expiration date (if applicable):</b> | <b>N/A</b>      |

**PROJECT OR PROGRAM MANAGER**

|                |  |               |                                 |
|----------------|--|---------------|---------------------------------|
| <b>Name:</b>   | <b>Colleen Weiser (PRA)/George Grotheer for HCS system</b> |               |                                 |
| <b>Office:</b> | <b>Office of Housing Counseling</b>                        | <b>Title:</b> | <b>Sr. Program Specialist</b>   |
| <b>Phone:</b>  | <b>703- 931-1827</b>                                       | <b>Email:</b> | <b>Colleen.a.weiser@hud.gov</b> |

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

|               |                      |               |                                |
|---------------|----------------------|---------------|--------------------------------|
| <b>Name:</b>  | <b>Tracene Davis</b> |               |                                |
| <b>Phone:</b> | <b>202-402-5748</b>  | <b>Email:</b> | <b>Tracene.l.davis@hud.gov</b> |

## SPECIFIC PTA QUESTIONS

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

The PTA is a required form for paperwork reduction act renewal package for OMB Collection 2502-0261, "The Housing Counseling Program". The PTA form is a new requirement since the last time the Office of Housing Counseling renewed this OMB collection. The PTA form replaces the old PIA (Privacy Impact Assessment) form.

The HUD-9902 form is embedded in the Housing Counseling System (HCS/ H11 system). Once a quarter each of our HUD- approved counseling agencies are required to electronically transmit their quarterly client data report (HUD-9902) from their client management system (CMS) to HUD's housing counseling system (HCS) system. There are no changes to the HUD-9902 form for this PRA renewal collection.

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

*If you are using these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.*

- Social Media
- Web portal<sup>1</sup> (e.g., SharePoint)
- Contact Lists
- Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)
- None of these

### 3. From whom does the Project or Program collect, maintain, use, or disseminate information?

*Please check all that apply.*

- This program collects no personally identifiable information<sup>2</sup>
- Members of the public
- HUD employees/contractors (list programs): our current contractor is Salient. Data collected from the 9902 report in HCS is often extracted and used on reports to the Commissioner or Congress. The

<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.

<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.

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|  | <p>only PII is the name of the agency submitting the report. All the other PII stored in HSC is limited to HUD staff use only.</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p> <p><input type="checkbox"/> Other (e.g. business entity)</p> |
|--|--|

| <b>4. What specific information about individuals is collected, generated or retained?</b>  |   |
|---|---|
| <p>The Housing Counseling System (HCS) is a real-time web application that manages the housing counseling program data. It maintains the list of agencies, collects counselor and client data and provides performance reports.</p> <p>The Housing Counseling System (HCS) is a real-time web application that manages the housing counseling program data. It maintains the list of agencies, collects counselor and client data, and provides performance reports.</p> <p>HCS is designed specifically to interface with other Client Management Systems (CMSs), and to collect client level housing counseling activity data via the HUD-9902 form which is included as part of OMB 2502-0261. Information collected is unique and is not duplicated by other systems.</p> <p>Agency information from HCS is also used to produce the listings of HUD-approved Housing Counseling Agencies by state on the web and via the toll-free phone number.</p> <p>HCS processes Housing Counseling Grants and administers the payment and reports on grant awards.</p> |   |
| <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>   | <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>  |
| <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>  | <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; Housing Counseling System,1 Docket No. FR-5130-N-32</p> |
| <b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b>   | <p><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please describe.</p>  |
| <b>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</b>   | <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes.</p>   |

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| <p><b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b></p>   | <p>24 CFR Part 214. Because clients will be uniquely identified by a portion of their social security number, HUD will be able to link to FHA, Fannie Mae, and Freddie Mac databases to track clients long-term.</p> |
| <p><b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>  | <p>Because clients will be uniquely identified by a portion of their social security number, HUD will be able to link to FHA, Fannie Mae, and Freddie Mac databases to track clients long-term.</p>                  |
| <p><b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b></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><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></p>   |  |
| <p>N/A</p>   |  |

|  |   |
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| <p><b>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</b></p>          | <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>Information regarding approved HECM Roster counselors which is stored in FHA Connection (F17C system) interacts with HCS.</p> |
| <p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</b></p> | <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p> <p><a href="#">Click here to enter text.</a></p>   |
| <p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b></p>         | <p>N/A</p>  |
| <p><b>7. Does the project, program, or system provide role-based training for personnel who have access in addition</b></p>            | <p><input type="checkbox"/> No.</p>   |

<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.

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| <p>to annual privacy training required of all HUD personnel?</p>   | <p><input checked="" type="checkbox"/> Yes. If yes, please list: new Office of Housing employees take a week long mentoring program. . One of the topics covers involves how to use the HSC system. The Office of Housing Counseling Staff use this system on a daily basis as part of their management of their housing counseling agency portfolio. Also, some of the screens in HCS are used in the staff to administer and manage the annual Comprehensive Housing Counseling Grant Awards.</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:<br/> <input type="checkbox"/> Yes. In what format is the accounting maintained:<br/> N/A</p>   |
| <p>9. Is there a FIPS 199 determination?<sup>4</sup></p>   | <p><input checked="" type="checkbox"/> Unknown.<br/> <input type="checkbox"/> No.<br/> <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:<br/> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity:<br/> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability:<br/> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> |

**PRIVACY THRESHOLD ANALYSIS REVIEW**

**(TO BE COMPLETED BY PROGRAM PLO)**

|   |                          |
|---|--------------------------|
| <p><b>Program Privacy Liaison Reviewer:</b></p>         | <p>Sherina Greene</p>    |
| <p><b>Date submitted to Program Privacy Office:</b></p> | <p>February 21, 2019</p> |

<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.

|  |                   |
|--|-------------------|
| <b>Date submitted to HUD Privacy Branch:</b>   | February 21, 2019 |
| <b>Program Privacy Liaison Officer Recommendation:</b><br><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)**

|   |   |
|---|---|
| <b>HUD Privacy Branch Reviewer:</b>         | Cindy Etheridge   |
| <b>Date approved by HUD Privacy Branch:</b> | March 20, 2019  |
| <b>PTA Expiration Date:</b>                 | This PTA will suffice, however, if there are any changes, please provide an update. |

**DESIGNATION**

|  |   |
|--|---|
| <b>Privacy Sensitive System:</b>   | Choose an item. If "no" PTA adjudication is complete.   |
| <b>Category of System:</b>   | Choose an item.<br>If "other" is selected, please describe: Click here to enter text.   |
| <b>Determination:</b>  | <input checked="" type="checkbox"/> PTA sufficient at this time.<br><input type="checkbox"/> Privacy compliance documentation determination in progress.<br><input type="checkbox"/> New information sharing arrangement is required.<br><input type="checkbox"/> HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies.<br><input type="checkbox"/> Privacy Act Statement required.<br><input type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) required.<br><input checked="" type="checkbox"/> System of Records Notice (SORN) required.<br><input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.<br><input type="checkbox"/> A Records Schedule may be required. Contact your program Records Officer. |
| <b>PIA:</b>  | Choose an item.<br>If covered by existing PCLIA, please list: Click here to enter text.   |
| <b>SORN:</b>   | Choose an item.<br>If covered by existing SORN, please list: Click here to enter text.  |
| <i>Please describe rationale for privacy compliance determination above.</i>                               |   |
| Comments by Privacy Reviewer: HUD forms used in this collection are: 9902, 9906, 424CB, HUD 2800 and 50153 |   |



UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

OFFICE OF ASSISTANT SECRETARY FOR HOUSING AND COMMUNITY DEVELOPMENT

COMMUNITY DEVELOPMENT DIVISION

MEMORANDUM FOR THE ASSISTANT SECRETARY FOR HOUSING AND COMMUNITY DEVELOPMENT

DATE: 3/20/19

TO: ASSISTANT SECRETARY FOR HOUSING AND COMMUNITY DEVELOPMENT

FROM: [Name]

SUBJECT: [Subject]

[Signature]

[Signature]

[Signature]

DATE: 3/20/19

OFFICE OF ASSISTANT SECRETARY FOR HOUSING AND COMMUNITY DEVELOPMENT

UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

400 MICHIGAN AVENUE, N.W. WASHINGTON, D.C. 20001

**DOCUMENT ENDORSMENT**

|   |
|---|
| DATE REVIEWED:                                    |
| PRIVACY REVIEWING OFFICIALS NAME: Cindy Etheridge |

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.

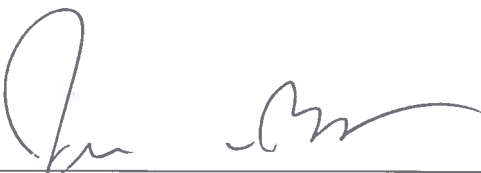
**Brian Siebenlist**

10/02/2018

**Date**

**SYSTEM OWNER**

**Brian Siebenlist, Director, Office of Policy and  
Grant Administration  
Office of Housing Counseling**



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**John Bravacos**

3/20/19

**Date**

**Senior Agency Official for Privacy**

**Privacy Branch**

**OFFICE OF ADMINISTRATION**