

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Manufactured Home Construction and  
Safety Standards Act  
RV Exemption Notice  
(2502-NEW)**

**Office of Manufactured Housing Programs**

**2018-10-15**

## 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>	Manufactured Home Construction and Safety Standards Act Reporting Requirements (2502-0253) - Revising the exemption for the manufacture of recreational vehicles (RV) to clarify which RVs qualify for an exemption from regulation by HUD's Manufactured Home Construction and Safety Standards and Manufactured Home Procedural and Enforcement regulations.		
<b>Program:</b>	Office of Housing		
<b>CSAM Name (if applicable):</b>	Click here to enter text.	<b>CSAM Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	<b>Notice of Proposed Rulemaking/Final Rule</b>	<b>Project or program status:</b>	Update
<b>Date first developed:</b>	UNKNOWN	<b>Pilot launch date:</b>	Click here to enter a date.
<b>Date of last PTA update:</b>	UNKNOWN	<b>Pilot end date:</b>	Click here to enter a date.
<b>ATO Status (if applicable)</b>	Choose an item.	<b>ATO expiration date (if applicable):</b>	N/A

**PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	Mr. Leo S. Huott		
<b>Office:</b>	Office of Manufactured Housing Programs	<b>Title:</b>	General Engineer
<b>Phone:</b>	202-402-4538	<b>Email:</b>	Leo.S.Huott@Hud.gov

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

<b>Name:</b>	Click here to enter text.		
<b>Phone:</b>	Click here to enter text.	<b>Email:</b>	N/A

## SPECIFIC PTA QUESTIONS

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

To carry out its responsibilities under the Act, the Department has issued the Federal Manufactured Home Construction and Safety Standards (the Standards), 24 CFR 3280. The Department has also issued the Manufactured Home Procedural and Enforcement Regulations (the Regulations), 24 CFR 3282, to enforce these standards. The Regulations incorporate an exemption from HUD regulation for recreational vehicles (RV) if they are: built on a single chassis; 400 square feet or less when measured at their largest horizontal projections; self-propelled or permanently towable by a light duty truck; and designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.

Through recent rulemaking, HUD is adopting a recommendation of the Manufactured Housing Consensus Committee (MHCC), a Federal Advisory Committee, and is clarifying the definition of recreational vehicle (RV) and modifying it to require certification with either the American National Standards Institute's (ANSI) standard for Park Model Recreational Vehicles (PMRV), A119.5-15 or the National Fire Protection Association's NFPA 1192, Standard on Recreational Vehicles, 2015 Edition. Since Park Model RVs built to ANSI A119.5-15 may exceed the RV exemption's 400 square foot threshold, a manufacturer must post notice in the home that the structure is only designed for recreation purposes and is not designed as a primary residence or for permanent occupancy. The proposed rule for this requirement (FR for Tuesday, February 9, 2016, Vol. 81 No. 26 pages 6806 through 6810) included an estimate of the information collection burdens at the time of the publication. The Department did not receive any substantive comment from either the public or the from OMB regarding the proposed information collection or burden estimates included in the proposed rule. More recent discussion with the RV Industry Association has informed this information collection burden estimate as the number of RV manufacturers building Park Model RVs has increased slightly since the proposed rule.

Therefore, for this submission of this new information collection, HUD is identifying the burden hours resulting from the requirement for PMRV manufacturers that produce exempt products to provide specific consumer notifications. HUD has determined that this information collection burden does not fit within other information collections for the Manufactured Housing program. Therefore, this information collection is being submitted as a new collection. This information collection:

- Includes the PMRV manufacturers as respondents (22 PMRV manufacturers building to the A119.5-15 Standard)
- Includes the burden hours associated with the time and cost for delivering a Manufacturer's Notice to prospective consumers prior to the completion of the sales transaction and placing the same notice inside the exempted PMRV. This is estimated at approximately 20 seconds per notice, the time incurred in developing a template notice, and using that template to create copies for delivery and posting in affected PMRVs.

### 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?

- This program collects no personally identifiable information<sup>2</sup>

<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

<p><i>Please check all that apply.</i></p>	<input 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 checked="" type="checkbox"/> Other (e.g. business entity)
<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>	
<p>There is no specific information about individuals collected, generated, or retained.</p>	
<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. <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. <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><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. <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 checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<p><b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b></p>	<p>Not applicable.</p>
<p><b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>Not applicable.</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>	<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.
<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>	

harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

<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

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No data elements are stored.

<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 checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:  <a href="#">Click here to enter text.</a></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.  <input type="checkbox"/> Yes. If yes, please list:  <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>Choose an item. Not applicable.</p>
<p><b>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?</b></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:</p>
<p><b>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?</b></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><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input type="checkbox"/> Unknown.  <input checked="" 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:</p>

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.

<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.

	<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
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**PRIVACY THRESHOLD ANALYSIS REVIEW**

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

<b>Program Privacy Liaison Reviewer:</b>	Sherina Greene/Jason McJury
<b>Date submitted to Program Privacy Office:</b>	November 16, 2018
<b>Date submitted to HUD Privacy Branch:</b>	November 16, 2018
<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.	

**(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)**

<b>HUD Privacy Branch Reviewer:</b>	Cindy Etheridge
<b>Date approved by HUD Privacy Branch:</b>	November 21, 2018
<b>PTA Expiration Date:</b>	This PTA will suffice, however, if there are any changes, an update will be required.

**DESIGNATION**

<b>Privacy Sensitive System:</b>	Choose an item. If "no" PTA adjudication is complete.
<b>Category of System:</b>	Choose an item. If "other" is selected, please describe: Click here to enter text.
<b>Determination:</b>	<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.	
<b>PIA:</b>	Choose an item. If covered by existing PCLIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>HUD Privacy Branch Comments: This is a new collection and no forms are included in this collection. There are no forms included in this collection.</b> <i>Please describe rationale for privacy compliance determination above.</i> <a href="#">Click here to enter text.</a>	

**DOCUMENT ENDORSMENT**

<b>DATE REVIEWED:</b>
<b>PRIVACY REVIEWING OFFICIALS NAME:</b>

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*

10/15/2018

Date

**SYSTEM OWNER**

Jason C. McJury, Civil Engineer  
 Office of Manufactured Housing Programs

*John Bravacos*

11/29/18

Date

**John Bravacos**

**Senior Agency Office for Privacy**

**Privacy Branch**

**OFFICE OF ADMINISTRATION**