

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**HUD Certified Housing Counselor
Registration - Office of Housing Counseling
U.S. Department of Housing and Urban
Development
Title**

OMB Control Number 2502-0614

Instruction & Template

July 16, 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:	Housing Counselor Certification Training and Examination		
Program:	Office of Housing		
CSAM Name (if applicable):	<p><u>HUD Certified Housing Counselor and Client Certificate of Housing Counseling Database. The systems impacted are the Housing Counseling System (F11), the Computerized Home Underwriting Management System (F-17), the FHA Connection (F-17C), the Single Family Housing Enterprise Data Warehouse(D64A)), and the HUD Certified Housing Counselor and Client Certificate of Housing Counseling Database, which is a module of F11</u></p>	CSAM Number (if applicable):	<p><u>HUD Certified Housing Counselor and Client Certificate of Housing Counseling Database. The systems impacted are the Housing Counseling System (F11), the Computerized Home Underwriting Management System (F-17), the FHA Connection (F-17C), the Single Family Housing Enterprise Data Warehouse(D64A)), and the HUD Certified Housing Counselor and Client Certificate of Housing Counseling Database, which is a module of F11</u></p>
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	The website www.hudhousingcounselors.com was launched June 4, 2015 and began collecting site registration information June 1, 2017. Examination registration began August 1, 2017	Pilot launch date:	NA
Date of last PTA update:	August 2015 Initial IPA was submitted	Pilot end date:	NA
ATO Status (if applicable)	NA	ATO expiration date (if applicable):	NA

PROJECT OR PROGRAM MANAGER

Name:	Lorraine Griscavage Frisbee		
Office:	Office of Housing Counseling	Title:	Deputy Director

Phone:	702-366-2160	Email:	Lorraine.Griscavagefrisbee@hud.gov
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INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name: NA	Tracene L. Davis		
Phone:	<u>202-402-5748</u>	Email:	<u>Tracene.L.Davis@hud.gov</u>

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal PTA

HUD has established a Housing Counselor Certification Exam, as mandated by Subtitle D of title XIV of the Wall Street Reform and Consumer Protection Act (Pub. L. 111-203, 124 Stat. 1376 (July 21, 2010)). HUD subsequently published the Final Rule for Housing Counseling Certification on December 14, 2016. This Final Rule codifies the requirements outlined in the Wall Street Reform and Consumer Protection Act. The Act and Final Rule requires individual housing counselors providing homeownership counseling or rental counseling under HUD programs to successfully pass a certification examination demonstrating competency in six (6) areas identified in the statute. A Federal Register notice was published May 31, 2017 announcing the availability of the examination August 1, 2017 and the compliance date of August 1, 2020. No changes have been made to the information collected.

The information will be collected electronically on the Office of Housing Counseling, HUD Housing Counselor Certification Training and Examination website www.HUDHousingCounselors.com, and with client authorization the information will be transferred to the HUD FHA Connection. The information collected will be used to certify housing counselors.

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 portal¹ (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 information²
- Members of the public
- HUD employees/contractors (list programs):
Office of Housing Counseling

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.

	<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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4. What specific information about individuals is collected, generated or retained?

<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 type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Registration through HUD's certification contractor's Web site for the on-line training will require name, city, state, telephone number, email address, occupation, if employer is a HUD participating housing counseling agency, and a HUD Housing Counseling System number. Registration for the certification examination through this system will require, in addition to the information for general registration, a full mailing address, social security number, language(s) spoken by the counselor when providing counseling servicing, and optional demographic data (race, ethnicity, gender) and whether the user needs special accommodations to take the exam. Collection of social security numbers is required for linking the individual's information to HUD's FHA Connection system, so HUD can verify applicants are employed by participating agencies.
<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 Notice of New HUD Certified Housing Counselor and Client certificate of Housing Counseling Database, System of Records Docket No. FR-5921-N-11, Published August 11, 2016 FR/Vol 81, No, 11
<p>4(c) Has the project, program, or system undergone any significant changes since the SORN?</p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe.
<p>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.

<p>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</p>	<p>HUD has established a Housing Counselor Certification Exam, as mandated by Subtitle D of title XIV of the Wall Street Reform and Consumer Protection Act (Pub. L. 111-203, 124 Stat. 1376 (July 21, 2010)). HUD subsequently published the Final Rule for Housing Counseling Certification on December 14, 2016. This Final Rule codifies the requirements outlined in the Wall Street Reform and Consumer Protection Act. SSNs are being collected to allow access to a government system.</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>The social security numbers will be used to match examination scores with the certified counselor applicants. Collection of social security numbers is required for linking the individual's test information and will be transferred to the FHA Connection system to verify applicants are employed by participating agencies.</p>
<p>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</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. Not Applicable</p> <p><input type="checkbox"/> Yes. If a log kept of communication traffic, please answer this question.</p>
<p>4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>Click here to enter text. NA</p>	

<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list: This system will interface with FHA Connection which in turn may share data collected with CHUMS, SFDW, and HCS. FHA Connection and related HUD systems will store data. PII collected for those individuals that pass the certification examination will be maintained permanently in HUD's system as passing the certification examination is a one-time requirement.</p>
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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>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list:</p> <p>Third-party payment processing system</p> <p>Practice exam delivery platform Brillium</p> <p>Proctoring service, Kriterion Global Testing Solutions, to take the certification examination</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<p>Existing</p> <p>The external systems listed above are all subcontractors to Bixal Inc, the HUD contractor for the HUD Housing Counselor Training and Examination website. The HUD Housing Counselors website will receive information from third-party vendors, including the online payment provider, practice exam delivery platform, certification exam delivery platform, and proctoring service, via an integrated application program interface (API).</p> <p>The HUD Housing Counselor website will not collect or store any financial data from users. A third-party online payment provider will serve as the secure gateway to collect and process credit card payments of fees for the certification exam. When an individual proceeds to pay for the exam registration, an external payment module from the third-party provider will load to collect payment. When the individual clicks the payment option, he or she will be directed to a secure HTTPS external form where the user will be able to enter payment information. Once the online payment is confirmed, users will be directed back to the HUD Housing Counselor website. The confirmation of payment will be reported back to the system via an integrated API. The practice exam delivery platform will report information about the number of users. The certification exam delivery platform will report exam results.</p>

	The HUD Housing Counselor website will not collect or store any financial data from users. The third-party payment processor will collect all credit card data using advanced web-based payment gateway integration.
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?	<input checked="" type="checkbox"/> No. <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 type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input checked="" type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination? ⁴	<input checked="" type="checkbox"/> Unknown. <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)

Program Privacy Liaison Reviewer:	<u>Sherina Greene</u>
Date submitted to Program Privacy Office:	<u>July 30, 2019</u>
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>	

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.

Click here to enter text.

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	July 30, 2019
PTA Expiration Date:	This PTA will suffice, however, if there any changes, an update will be required.

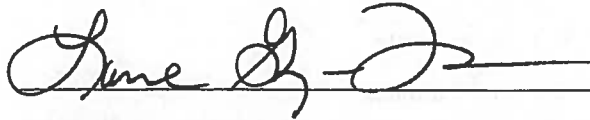
DESIGNATION

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 checked="" 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: <u>No forms included in this collection.</u> <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSMENT

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.



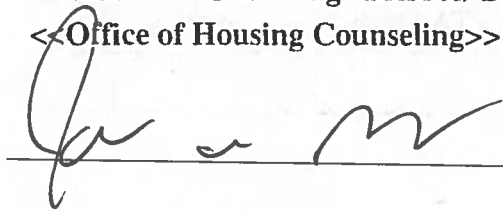
7-17-2019
Date

SYSTEM OWNER

<< Lorraine Griscavage Frisbee/ Deputy Director >

<< Office of Housing Counseling >>

7/17/2019



8/6/19

John Bravacos
Senior Agency Official for Privacy
Privacy Branch
Office of Administration

Date

