

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

PRIVACY THRESHOLD ANALYSIS (PTA)

Needs Assessment

Community Planning & Development

[October 23, 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:	Needs Assessment		
Program:	<input type="text"/>		
CSAM Name (if applicable):	Needs Assessment	CSAM Number (if applicable):	Needs Assessment
Type of Project or Program:	<input type="text"/>	Project or status:	<input type="text"/>
Date first developed:	May 11, 2016	Pilot launch date:	February 18, 2011
Date of last PTA update:	May 11, 2016	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	<input type="text"/>	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Stephanie Stone		
Office:	Technical Assistance Division	Title:	Director
Phone:	202-402-7418	Email:	Stephanie.v.stone@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA:		
<p><i>The technical Assistance Division uses the Needs Assessment (NA) to collect key information about a CPD grant status and grantee performance on their grant award. A Needs Assessment is requested by the CPD program office when the grantee through and in conjunction with their field office requests HUD assistance to help manage their grant award.</i></p> <p><i>A Needs Assessment delves into a number of performance areas to try to determine where problems lie and once all info is collected, the document is further analyzed for next steps. An NA helps to gauge the extent of the need and assists the program office and the technical Assistance Division to further ferret out problem areas and gauge the extent of assistance needed.</i></p> <p><i>This is a renewal PTA</i>, while there have been new NOFAs, the CPD programs’ mission, purpose, intent, and info collected verbally by HUD and their agents has remained the same; the information is extensive and invaluable for program award and status evaluation.</p>		

<p>2. Does this system employ the following technologies?</p> <p><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 portal² (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>
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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</p> <p><i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> This program collects no personally identifiable information³</p> <p><input type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p>
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² 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.

³ 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 checked="" type="checkbox"/> Other (e.g. business entity)
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4. What specific information about individuals is collected, generated or retained?	
<i>No specific information about or from individuals is collected, no PII is collected, only information pertaining to CPD program oversight and processes and procedures used.</i>	
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?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
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?	<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
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:	NA
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	NA
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 data⁴ is stored in the communication traffic log, please detail the data elements stored.	

⁴ 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.

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.)?	<div style="border: 1px solid black; height: 20px; width: 100%;"></div> <p>Please describe applicable information sharing governance in place:</p> <p>An MOU is occasionally used; info is reviewed by the program and field office staff in conjunction with the TA Provider and grantee.</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?	<input checked="" type="checkbox"/> No. NO PII is collected or maintained. <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. No PII is collected or maintained. What steps will be taken to develop and maintain the accounting: PII is NOT used. <input type="checkbox"/> Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?⁵	<input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. No PII is collected or maintained. <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

⁵ 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.

	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)**

Program Privacy Liaison Reviewer:	Click here to enter text.
Date submitted to Program Privacy Office:	Click here to enter a date.
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>	
Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Click here to enter text.
Date approved by HUD Privacy Branch:	Click here to enter a date.
PTA Expiration Date:	Click here to enter a date.

DESIGNATION

Privacy Sensitive System:	<input type="text"/> If "no" PTA adjudication is complete.
Category of System:	<input type="text"/> If "other" is selected, please describe: There is no system; info is collected verbally and from review of award status and performance records, the NA is developed.
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:	<input type="text"/> If covered by existing PCLIA, please list: Click here to enter text.
SORN:	<input type="text"/> If covered by existing SORN, please list: Click here to enter text.
HUD Privacy Branch Comments: This PTA will suffice at this time, however; if there are any changes, an update will be required. <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.

SYSTEM OWNER

<< INSERT NAME/TITLE >>
<< INSERT PROGRAM OFFICE >>

Date

John Bravacos
Senior Agency Official for Privacy
Privacy Branch

Date

OFFICE OF ADMINISTRATION