

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Application for Membership on the Housing  
Counseling Federal Advisory Committee  
(HCFAC) 2502-0606**

**Office of Housing Counseling  
Office of Outreach and Capacity Building**

**November 26, 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](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>	Application for Membership on the Housing Counseling Federal Advisory Committee (HCFAC) 2502-0606		
<b>Program:</b>	Office of Housing		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Existing
<b>Date first developed:</b>	October 14, 2013	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update:</b>	November 1, 2017	<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>	Virginia F. Holman		
<b>Office:</b>	Office of Housing Counseling	<b>Title:</b>	Housing Specialist
<b>Phone:</b>	(cell) 540-894-7790	<b>Email:</b>	Viriginia.f.holman@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>	Click here to enter text.

## SPECIFIC PTA QUESTIONS

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

The Dodd-Frank Act (the Expand and Preserve Homeownership through Counseling Act, Public Law 111–203, title XIV, § 1441, July 21, 2010, 124 Stat. 2163 (Act), 42 USC 3533(g) directs the Office of Housing Counseling to form a Housing Counseling Federal Advisory Committee (HCFAC) with 12 members representing the mortgage and real estate industries, housing consumers and housing counseling agencies. The HUD-90005, Application for Membership on the Housing Counseling Federal Advisory Committee will collect information for individuals in those groups who want to serve on the HCFAC. There have been no PII changes to the information previously approved by OMB.

The information to be collected uses HUD-90005, Application for Membership on the Housing Counseling Federal Advisory Committee. The information will be used by HUD’s Office of Housing Counseling (OHC) to review applications and to recommend to the Secretary for appointment the members of the HCFAC to ensure the members meet the requirements of the *Expand and Preserve Homeownership through Counseling Act*, the *Federal Advisory Committee Act* and the HCFAC Charter. Nominations may be made by agency officials, members of Congress, the general public, professional organizations, and the nominee. Nominations can be made anywhere in the country.

### 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) **SharePoint is used to store information**
- Contact Lists
- Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)
- None of these –

<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.

<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program collects no personally identifiable information<sup>2</sup></p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input checked="" type="checkbox"/> HUD employees/contractors (list programs): <b>OHC, OCFO (Travel/Per diem Voucher Records), OGC (OGE-450)</b></p> <p><input checked="" 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>
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p> <p>HUD-90005 asks legal first and last name, mailing address, telephone number, cell phone number, personal email address, business email address, and employer with address. Applicants will provide demographic information: race, ethnicity, and gender. Other biographical and professional information is requested. Resumes are submitted as part of the HUD- 90005 and may provide PII. There is no OHC required format for resumes, but resumes may have dates of birth and other PII. Routine EXCEL reports which are pulled from SharePoint are reviewed only by OHC staff and Housing Management. The OGE-450 collects PII but only OCG review the form. Members Travel/Per diem vouchers submitted through the contracting officer may contain PII which is not shared.</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>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Applicants legal first and last name, mailing address, telephone number, cell phone number, personal email address, business email address, and employer with address.</p>
<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>	<p><input checked="" type="checkbox"/> No. Please continue to next question. Draft SORN and PIA have been submitted to the Privacy Office for approval.</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</p>

<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.

	reflecting amendment to the system
<b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe.
<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>	Not applicable.
<b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	
<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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: <b>The OGE-450 is received and reviewed ONLY by OCG. OHC staff never see the forms. The travel/Per-diem voucher is received by OCFO and reviewed and approved by OHC.</b>
<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: <b>Through the CFO, OHC has a support services contract. Vouchers submitted through the</b>

<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.

	<b>contracting officer may contain PII which is not shared.</b>
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b>	Existing - Not applicable. Please describe applicable information sharing governance in place:
<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>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
<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>	<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: an Excel spreadsheet is maintained. Additionally, no disclosures of PII are made outside the Department.
<b>9. Is there a FIPS 199 determination?<sup>4</sup></b>	<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: <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>	<b>Nadine Smith</b>
<b>Date submitted to Program Privacy Office:</b>	<b>November 26, 2019</b>

<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>	November 26, 2019
<b>Program Privacy Liaison Officer Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Request determination the Privacy Office for:	
<ul style="list-style-type: none"> <li>• SharePoint storage of non-Sensitive PII, whether this storage warrants alternative storage method <u>and</u></li> <li>• Additional privacy documentation coverage.</li> </ul>	

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

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

**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 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: Click here to enter text.
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: Click here to enter text.
<b>HUD Privacy Branch Comments:</b> <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.

Virginia F. Holman

12-11  
9/23/2019

Date

**PROGRAM MANAGER**

**Virginia F. Holman, Housing Specialist  
Office of Housing Counseling, Office of Outreach  
and Capacity Building.**

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**SENIOR AGENCY OFFICIAL FOR PRIVACY**

Date

**JOHN BRAVACOS  
OFFICE OF ADMINISTRATION**