U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

PRIVACY THRESHOLD ANALYSIS (PTA)

Capital Needs Assessment e-TOOL
(CNA e-Tool) P282

Multifamily Housing
Office of Program Systems Management

Instruction & Template

Reported August 2015
Converted to latest PTA 6/29/17

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:

Marcus Smallwood, Acting, Chief Privacy Officer
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:	**Capital Needs Assessment (CNA) e-Tool**		
Program:	**Office of Housing**		
CSAM Name (if applicable):	**N/A**	**CSAM Number (if applicable):**	**N/A**
Type of Project or Program:	**IT System**	**Project or program status:**	**Operational**
Date first developed:	**August 19, 2015**	**Pilot launch date:**	**August 29, 2014**
Date of last PTA update:	**August 19, 2015**	**Pilot end date:**	**December 30, 2016**
ATO Status (if applicable)	Choose an item.	**ATO expiration date (if applicable):**	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Sean T Cortopassi		
Office:	HSNG/PSMO	**Title:**	IT Project Manager
Phone:	202-402-4087	**Email:**	Sean.T.Cortopassi@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Cassandra Ross		
Phone:	202-402-7183	**Email:**	Cassandra.ross@hud.gov

SPECIFIC PTA QUESTIONS

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

Please provide a general description of the project and its purpose so a non-technical person could understand. If this is an updated PTA, please describe what changes and/or upgrades triggering the update to this PTA. If this is a renewal please state whether there were any changes to the project, program, or system since the last version.

The Capital Needs Assessment (CNA) e-Tool is a tool that provides an automated, electronic, CNA for a multifamily property with a schedule of recommended replacements and associated costs for each year in an estimate period of 20 years. The CNA e Tool is a coordinated assembly of several automated 'tools' and electronic templates developed by HUD-Multifamily Housing and USDA Rural Development to establish an aligned data standard and analytical framework for preparing capital needs assessments. A CNA is a due diligence report commonly used in the multifamily industry to examine current physical conditions at properties, specify repairs/replacements needed immediately and to budget for long-term capital repair and replacement needs during the life of an asset. The FHA case number is related to project. The FHA case number in CNA e-tool is used as a reference to the case number for the project that is being assessed.

CNA e-tool users consist of:

- Agency Reviewers are employees or contractors of HUD or USDA, depending on the specifics of the program, who review and approve the CNA after it is submitted. Agency Reviewers primarily work within the Web Portal, but will need to be familiar with the fields within the Assessment Tool as well.
- Needs Assessors are firms or persons employed for conducting the property assessment and typically do not require Secure Systems access. They typically just access the Public Validation Portal (Note that Needs Assessors in rare instances may access and submit CNA's. This is only done when HUD is serving as the lender and may be applicable to Recapitalization Projects).
- Lenders are banks, credit unions or other financial institutions that may be providing financing or servicing an existing loan for a multifamily property where a CNA is required. Lenders are normally responsible for completing the Financial Factors and Repair Replace Decision steps within the Assessment Tool. For HUD, Federal Housing Administration (FHA) programs and USDA's 538 Loan Guarantee program, Lenders are responsible for submitting CNAs through the Submission Web Portal,
- Owners are the owners of the properties being evaluated (Note: The Owner's Portal functionality will be built if-and-when future Development Funding can be provided, but that capability does not currently exist within the CNA e-Tool).

The CNA e-Tool application is hosted on the Secure Systems Platform. Obtaining access to any secure system is a two-step process consisting of authentication and authorization for both internal and external users. Authentication is the process of determining whether someone or something is who or what they claim to be. At the end of authentication process, a user receives an electronic user identification number and a password. Authorization is the process of determining which permissions an authenticated user is supposed to have. At the end of the

authorization process, a user will be able to use their user ID and password to access secure systems.
The DIAMS process is separate system architecture from CNA e-tool and used for account management. The DIAMS Application Access Request Form is a web-based form used to submit and record requests for access to HUD systems. DIAMS requests are recorded in the HUD IT Services National Help Desk and automatically routed to the designated System Security Administrator (SSA) of the requested system. The SSA monitors and processes requests using the HITS Service Desk system. Designated HUD Supervisor Approves Request using DIAMS. System Security Administrator Approves Request once the signed ROB is received. After the request is approved, the SSA will grant you access to the system and set the task status to complete. The user and the DIAMS submitter will receive an email once this is done.

Internal HUD user access the CNA e-Tool with an H ID or C ID through the WASS internal URL. (ttps://hudapps.hud.gov/ssmaster). In order to access the CNA e-Tool, a user must be authenticated by HUD. The H ID & C ID and password are the authentication credentials for HUD employees. Refer to the HUD Office of the Chief Human Capital Officer, Personnel Security Division for information regarding the process for obtaining a HUD ID. Proof of completion of annual security awareness training is required. All information system users must complete Security Awareness Training before obtaining access to secure systems. Proof of completion must be attached to your email request. This requirement can be fulfilled with a certificate of completion of an agency-approved security awareness course, proof of agency specific training, or proof of completion of the Defense Information Systems Agency Cyber Awareness Challenge. A signed Rules of Behavior (ROB) for the CNA e-Tool. All information system users must agree to ROB before obtaining access to secure systems. A signed ROB must be attached to your email request. The CNA e-Tool ROB can be found on CNA e-Tool website at the following URL: (http://hudatwork.hud.gov/HUD/chco/po/a/). In order to access the CNA e-Tool, a user must obtain authorization. Authorization for federal employees or contractor employees is requested through the Digital Identity and Access Management System (DIAMS) Business Application Access Request process.

External Lender user access the CNA e-Tool with an M ID through FHA Connection (https://entp.hud.gov/clas/index.cfm). External Independent user access the CNA e-Tool with an M ID through WASS (https://hudapps.hud.gov/HUD_Systems). In order to access the CNA e-Tool, a user must be authenticated by HUD. The M ID and password are the principal authentication credentials for HUD external lender users. The I ID and password are the principal authentication credentials for HUD external Independent users (Refer to the REAC TAC website for information regarding the process for obtaining an Independent ID or access to Secure Systems). In order to access the CNA e-Tool, a user must obtain authorization and have an assigned role. Authorization for HUD external independent users is requested by an email sent to the CNA e-Tool System Security Administrator (SSA). Authorization for HUD external lender users must contact their company's M ID Coordinator. Lender User Requests Access. An email is sent to user's M ID Coordinator requesting access to the CNA e-Tool. The email must contain signed ROB and profile information (Last Name, First Name, Middle Initial and M-ID). The M ID Company Coordinator will either approve or deny user's access request and send an email. M ID Coordinator Grants Application Access. If the request is approved, the M ID Coordinator will grant user access to the system and send an email. Independent User Requests

Access. First the independent user registers with REAC TAC and gets an I ID issued. Then the independent user sends an email to the SSA at CNAaccess@hud.gov requesting access and a role to the CNA e-Tool. The email must contain justification for why access and role(s) are needed. (Note: These requests will only be approved with extenuating circumstances.), proof of completion the Defense Information Systems Agency (DISA) Cyber Awareness Challenge Course and profile information. The SSA will either approve or deny independent user access request and send a reply email. If the request is approved, the SSA will grant independent user's access to a CNA e-Tool role and will send a reply email.

The CNA database temporarily stores H-ID and C-ID for 30 days as part of validation progress. M-ID and I-ID are temporarily stored for 30 days in the CNA database. Internal HUD H-ID and C-ID users authenticate via Active Directory and have single sign on to Secure Systems. All other External IDs authenticate using Lightweight Directory Access Protocol.

There are four (4) parts and instructions:

1. Excel based Assessment Tool (excel template in workbook format)
2. Public Validation engine, for Needs Assessors
3. Secured Submission Portal, for lenders or submitters
4. Secured Reviewer portal, for government staff

Information in the CNA eTool enables HUD/FHA and USDA-RD to (1) review the regulatory compliance of projects/properties seeking or currently covered by Agency Insurance, (2) review the financial needs of projects/properties seeking or currently covered by Agency Insurance, and (3) Anticipate the future financial needs of projects/properties seeking or currently covered by Agency Insurance.

Needs Assessor completes first thirteen (13) worksheets in the Assessment tool. Needs Assessors identify immediate and future needs. The Needs Assessor is encouraged to validate frequently to obtain results and make edits to the CNA. After the Assessment tool is completed, and the Needs Assessor prepares additional attachments for the lender (i.e.: Pictures and evidence of site survey's and USGS Seismic Activity documents). The Needs Assessor should also download the remaining flags, and prepares draft Flag Notes for the lender (there are three types of flags: (1) informative, (2) warning, and (3) severe). The validation engine will not allow a CNA to be validated with severe flags, and the Needs assessor should not send the partially completed Assessor tool to the lender with sever flags. The final assessor step is submission to the Lender.

Next the lender receives an e-mail with the Assessment tool and additional files from the Needs Assessor. The Lender must login to Secure Systems Platform and accesses the CNA e-Tool Application. The lender fills out the remaining two forms and validates the CNA in the Secured Submission Portal. The lender checks for other serious warning flags that the Needs Assessor should have cured; returns to Needs Assessor if warranted. Some severe and warning flags may be for lenders tasks not yet done. The lender goes to locate CNA tab and opens the just validated CNA, completes review, prepares CNA and all exhibits for submission. The CNA e-tool secured validation engine does calculations using a standardized methodology. The lender submits CNA simultaneous with filing applications and paying HUD-FHA application fee at pay.gov. After a successful submission, the lender can use “Locate CNA" tab in the Submission Portal to see status and comments (but is unable to make edits while the CNA is under review). In the future HUD action to change “status” will trigger automated e-mail notice (future functionality that will be built in the near future).

After change in status, lender uses “Locate CNA” tab to see HUD reviewer comments. If “returned” the lender revises CNA in the Assessment Tool and resubmits. If “approved”, lender has a firm commitment pending. If error or omission at Submission, lender must call HUD to have CNA returned. If amended Firm Commitment is requested for CNA changes, HUD will “undo approval” and CNA will be returned to lender for revisions and resubmission consistent with requested amendment to Firm.

All CNA data is entered in the Assessment tool. Only comments, notes and attachments are added in Submission Portal. Government staff comments, and status changes are added in Reviewer Portal. The CNA can be amended only by editing the original Assessment Tool file and revalidating. The related CNA attachments to Firm Commitments are downloaded and printed from the approved CNA in the Reviewer Portal.

Once CNA is submitted, it is stored for three years. Once the CNA is approved, data and workbook is stored indefinitely in CNA database in the CNA e-Tool Data Warehouse Server. This database generates (1) Oracle Business Intelligence Enterprise Edition (OBIEE) reports, (2) Oracle ADF portfolio, and (3) Oracle published reports.

Data and reports generated from the CNA e-tool should be available for individual properties and on a portfolio basis to Needs Assessors, Lenders, and Agency Staff as their interests may appear. Portfolio data will permit aggregated reports for selected data items and indices by region, by construction items or categories, by energy savings and related metrics. Such reports will be useful for underwriting, asset management and policy analysis. Meanwhile, at HUD individual property CNAs will be underwritten and revised by MAP Lenders, reviewed by MF Production, MF OAMPO, and MF Recapitalization field staff depending on the type of deal that is submitted. In the future, functionality will be built in to make updates after Endorsement by Asset Management field staff as repairs and replacements are funded from disbursements from the property Reserve for Replacements escrow. (This task is now manually executed with HUD Form 9250, but will be automated in a future phase of development if funding can be secured). Currently in underwriting, MAP Lenders and MF Production field staff rely on paper or pdf CNAs prepared in a combination of word processing and spreadsheet software where CNA’s are manually revised with final conclusions reduced to paper exhibits attached to a Firm Commitment.). In the future, the CNA process will become “living” or a continuously updated capability which will allow Asset Managers and owners to make adjustments for individual properties after that functionality is built.

While the CNA e-Tool has defined a common protocol, and HUD will store data for all properties in which it has a fiduciary or regulatory interest, it is intended that other agencies and users may also store data for groups of properties in which they have a similar interest. So, for example a state housing finance agency might store data for its portfolio of properties, or a private portfolio owner or manager might store data for all the properties it owns or manages.

The CNA e-Tool would generate a property-specific report that might reside in multiple databases and in each case the database owner would determine who had rights to access and edit data and reports after that future functionality is built. The CNA e-Tool itself has defined the scope and content of a CNA, and a report for a particular property is available only to authorized users, typically the Needs Assessor, the Lender, and/or an Agency providing governance, financing, or assistance. Reports derived from aggregated data residing in a HUD database would be available only to authorized users of the database.

Future functionality will produce:

- Level One reports entering the database either as part of iREMS or through a common aggregator.
- Level Two reports would enter the database through the Application Underwriting Support System (AUSS)/Development Application Processing (DAP) system or a successor automated underwriting system, or again through a common aggregator that would feed other HUD systems.
- Baseline project data from CNA submission to Level Two reports will be obtained when a property enters the HUD portfolio would be used to populate future Level One reports for the same property and may also be useful inputs to other HUD systems such as PASS.
- The CNA eTool will collect information on Multifamily properties and exchange data with HUD's DAP replacement system.
- The eTool will record the financial needs projections for Multifamily insured properties based on findings collected from a Needs Assessor and validated by the Lender.

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[1] (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[2]

[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.

Please check all that apply.	☐ Members of the public ☒ HUD employees/contractors (list programs): ☐ Contractors working on behalf of HUD ☒ Employees of other federal agencies ☐ Other (e.g. business entity)

4. What specific information about individuals is collected, generated or retained?
Please provide a specific description of information collected, generated, or retained (such as full names, maiden name, mother's maiden name, alias, social security number, passport number, driver's license number, taxpayer identification number, patient identification number, financial account, credit card number, street , internet protocol, media access control, telephone number, mobile number, business number, photograph image, x-rays, fingerprints, biometric image, template date(e.g. retain scan, well-defined group of people),vehicle registration number, title number and information about an induvial that is linked or linkable to one of the above (e.g. date of date, place of birth, race, religion, weight, activities, geographical indictors, employment information, medial information, education information, financial information) and etc. • Agency Reviewers: Temporary HUD employees H-ID and HUD Contractor C-ID, G-ID • Needs Assessors: I-ID • Lenders: M-ID, Mortgagor (Property) FHA Case Numbers • Participant Information: Firm Name, Role, Street Address, City, State, Zip Code, Contact Name, Contact Phone, Contact Email, Participant ID

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?	☒ No. Please continue to next question. ☐ 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?	☒ No. Please continue to next question. ☐ 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?	☒ No. Please continue to next question. ☐ Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.

4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	Click here to enter text.
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	Click here to enter text.
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? *For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?*	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer this question.
4(h) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	☐ No. ☒ Yes. If yes, please list: • Connects to Web Access Security Subsystem (WASS) for HUD and HUD contractor's user authentication • Connects to FHA Connections for Lender, Needs Assessor user authentication. External Lender user access the CNA e-Tool with an M ID through FHA Connection
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.

[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.

6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Choose an item. ☐ No. ☒ Yes. Please describe applicable information sharing governance in place: **Information sharing access agreement are covered in project charter and change control board documentation.**
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?	☐ No. ☒ Yes. If yes, please list: • System Security Administrator Training • System Owner Training • Assessor Tool Training • Submitter Training
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?	☒ No. What steps will be taken to develop and maintain the accounting: None, the project does not appear to trigger SORN requirements. ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☐ Unknown. ☐ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☒ Moderate ☐ High Integrity: ☒ Low ☐ Moderate ☐ High Availability: ☒ Low ☐ Moderate ☐ High

[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.

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	**Nadine Smith**
Date submitted to Program Privacy Office:	**July 24, 2017**
Date submitted to HUD Privacy Branch:	August 3, 2017

Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*
Click here to enter text.

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	**Marcus Smallwood**
Date approved by HUD Privacy Branch:	August 3, 2017
PTA Expiration Date:	August 3, 2019

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:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☐ Privacy Act Statement required. ☒ Privacy and Civil Liberties Impact Assessment (PCLIA) required. ☐ System of Records Notice (SORN) required. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.

	☐ A Records Schedule may be required. Contact your program Records Officer.
PIA:	Choose an item. If covered by existing PCLIA, please list:
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text.

HUD Privacy Branch Comments: *Please describe rationale for privacy compliance determination above.*
Click here to enter text.

DOCUMENT ENDORSMENT

DATE REVIEWED:	8/3/2017
PRIVACY REVIEWING OFFICIALS NAME:	Marcus Smallwood

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.

Winfred Chan
Digitally signed by: Winfred Chan
DN: CN = Winfred Chan email = winfred.g.chan@hud.gov C = US O = HUD OU = MF Housing
Date: 2017.08.03 11:04:46 -05'00'

Date

SYSTEM OWNER

Winfred Chan, Deputy Director
Office of the Deputy Assistant Secretary for Multifamily Housing
Program Systems Management Office

MARCUS SMALLWOOD
Digitally signed by: MARCUS SMALLWOOD
DN: CN = MARCUS SMALLWOOD C = US O = U.S. Government OU = Department of Housing and Urban Development, Office of Administration
Date: 2017.08.03 09:24:50 -05'00'

8-03-17

Date

CHIEF PRIVACY OFFICER

Marcus Smallwood, Chief Privacy Officer (acting)
OFFICE OF ADMINISTRATION