

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Research and Evaluation, Demonstration,
and Data Analysis and Utilization**

Office of Policy Development and Research

Instruction & Template

[September 19,2017]

PRIVACY THRESHOLD ANALYSIS

The Privacy Threshold Analysis (PTA) is a compliance form developed by the Privacy Branch to identify, across the Department, the use of Personally Identifiable Information (PII). 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
- The risks to the information

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 or a System of Records Notice (SORN) is required under the Privacy Act of 1974, as amended.

Complete the form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to Marcus R. Smallwood, Acting Chief Privacy Officer, Privacy Branch, U.S. Department of Housing and Urban Development, 451 7th Street, SW, Room 10139, Washington, DC 20410 or privacy@hud.gov.

Upon its receipt from your program PLO, the HUD Privacy Branch will review the completed form. If it determines that a PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return to the Branch.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	The Notice of Funding Availability for Research and Evaluation, Demonstration, and Data Analysis and Utilization (HUDRD)		
Program:	Policy Development and Research (PD&R)		
CSAM Name (if applicable):	Click here to enter text.	CSAM Number (if applicable):	Click here to enter text.
Type of Project or Program:	Program	Project or program status:	Existing
Date first developed:	April 11, 2016	Pilot launch date:	August 11, 2016
Date of last PTA update:	Click here to enter a date.	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Madlyn Wohlman Rodriguez		
Office:	Policy Development and Research (PD&R)	Title:	Grants Officer
Phone:	202 402 5939	Email:	madlyn.wohlmanrodriguez@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: Choose an item.
<p><i>Please provide a general description of the project and its purpose so a nontechnical person could understand. If this is an updated PTA, please describe the 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.</i></p> <p>The Notice of Funding Availability for Research and Evaluation, Demonstration, and Data Analysis and Utilization seeks to further PD&R’s mission to inform policy development and implementation to improve life in American communities through conducting, supporting, and sharing research, surveys, demonstrations, program evaluations, and best practices. This broad mission addresses the following strategic goals contained in HUD’s Strategic Plan:</p> <p>(1) Strengthen the Nation’s Housing Market to Bolster the Economy and Protect Consumers; (2) Meet the Need for Quality Affordable Rental Homes; (3) Use Housing as a Platform to Improve Quality of Life; and (4) Build Strong, Resilient, and Inclusive Communities.</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 portal¹ (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 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><input checked="" type="checkbox"/> This program collects no personally identifiable information²</p>
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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, as 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

<p><i>Please check all that apply.</i></p>	<p><i>Applicants for the Notice of Funding Availability for Research and Evaluation, Demonstration, and Data Analysis and Utilization research grants do not give personal identifiable information only names of principal investigators, researchers and contractors – and submit only business addresses. They do not give personal email – only business email. They do not give personal phone numbers – only business information.</i></p> <p><input checked="" 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> <p><input checked="" type="checkbox"/> Other (e.g., business entity)</p>
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<p>4. What specific information about individuals is collected, generated, or retained?</p>	
<p><i>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 address, 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 individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information, etc.</i></p>	
<p>4(a) Does the project, program, or system retrieve information about U.S. Citizens or lawfully admitted permanent resident aliens using personal identifiers?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question.</p> <p><input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p> <p><i>Applicants for the Notice of Funding Availability for Research and Evaluation, Demonstration, and Data Analysis and Utilization research grants do not give personal identifiable information only names of principal investigators, researchers and contractors – and submit only business addresses. They do not give personal email – only business email. They do not give personal phone numbers – only business information.</i></p>

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.

<p>4(b) Does the project, program, or system have an existing System of Records Notice (SORN), that has already been published in the <i>Federal Register</i> that covers the information collected?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question. <input type="checkbox"/> Yes. If yes, provide the system name and number, and the <i>Federal Register</i> citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system</p>
<p>4(c) Has the project, program, or system undergone any significant changes since the SORN?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question. <input type="checkbox"/> Yes. If yes, please describe.</p>
<p>4(d) Does the project, program, or system use Social Security numbers (SSN)?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.</p>
<p>4(e) If yes to 4(d), please provide the specific legal authority and purpose for the collection of SSNs.</p>	<p>Click here to enter text.</p>
<p>4(f) If yes to 4(d), please describe the uses of the SSNs within the project, program, or system.</p>	<p>Click here to enter text.</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. <input type="checkbox"/> Yes. If a log of communication traffic is kept, please provide that information here.</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.</p>	

<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</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 checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please choose from the dropdown menu below: Choose an item. Please describe applicable information sharing governance in place:</p>
<p>7. Does the project, program, or system provide role-based training for personnel who have access, in addition to the annual privacy training required of all HUD personnel?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>
<p>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?</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>9. Is there a FIPS 199 determination?⁴</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: <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</p>

⁴ FIPS 199 ([Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems) is used to establish security categories of information systems.

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Ronald Hill
Date submitted to Program Privacy Office:	September 19, 2017
Date submitted to HUD Privacy Branch:	September 19, 2017
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:	Cindy Etheridge
Date approved by HUD Privacy Branch:	September 19, 2017
PTA Expiration Date:	September 21, 2020

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 Impact Assessment (PIA) 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:	Choose an item. If covered by existing PIA, please list: N/A
SORN:	Choose an item. If covered by existing SORN, please list: N/A
HUD Privacy Branch Comments:	

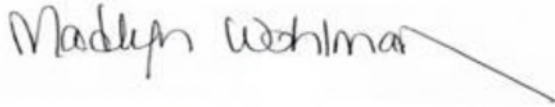
Please describe rationale for privacy compliance determination above.

Click here to enter text.

DOCUMENT ENDORSEMENT

DATE REVIEWED: 9/19/2017
PRIVACY REVIEWING OFFICIAL'S NAME: Cindy Etheridge

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
**Madlyn Wohlman-Rodriquez/Office of University
Partnerships**
Office of Policy Development and Research

Date
9/19/2017

9/19/2017

CHIEF PRIVACY OFFICER
Marcus Smallwood/Privacy Officer
OFFICE OF ADMINISTRATION

Date