

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**HUD-50058, HUD-50058 MTW, HUD-50058
MTW Expansion Family Reports**

**Moving to Work, Office of Public Housing
Investment, Public and Indian Housing**

**Instructions & Template
OMB Control 2577-0083**

July 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 Impact Assessment (PIA) 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 (SAOP)
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 PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	HUD-50058, HUD-50058 MTW, HUD-50058 MTW Expansion Family Reports OMB Control Number: 2577-0083		
Program:	Public and Indian Housing (PIH)		
CSAM Name (if applicable):	IMS/PIC	CSAM Number (if applicable):	1015
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	50058 has been in place for over 30 years	Pilot launch date:	n/a
Date of last PTA update:	August 4, 2016 (Last 50058 IPA)	Pilot end date:	n/a
ATO Status (if applicable)	Complete (IMS/PIC)	ATO expiration date (if applicable):	January 31, 2021 (IMS/PIC)

PROJECT OR PROGRAM MANAGER

Name:	Wendalyn Hovendick		
Office:	PIH	Title:	Management Information Specialist
Phone:	202-402-3709	Email:	Wendalyn.M.Hovendick@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Dallas Blair		
Phone:	202-475-8699	Email:	Dallas.C.Blair@hud.gov

SPECIFIC PTA QUESTIONS

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

The HUD-50058, HUD-50058 MTW, and HUD-50058 MTW Expansion Family Reports are forms that are submitted to the IMS/PIC system by public housing authorities (PHAs). The information provided on this form is due to the PRA currently being submitted to obtain OMB approval for the HUD-50058 MTW Expansion form, which is a derivative of the other two forms in this information collection. The last PRA for the forms in this information collection included the IPA form, which is no longer in use, therefore this form is being used this time. This PTA is solely for the forms in this information collection; it is not meant as an update to the PTA for the IMS/PIC system. Any information provided about IMS/PIC is only due to that being the system the data is submitted into.

The forms HUD-50058, HUD-50058 MTW, and HUD-50058 MTW Expansion Family Reports solicit demographic, family profile, income and housing information on the entire nationwide population participating in the public housing and voucher programs. This information is utilized for the subsequent purposes:

- *Analyze public housing and housing choice voucher programs;*
- *Permit PHAs to monitor their own reporting to identify favorable and unfavorable trends;*
- *Monitor PHAs and participants for compliance with program regulations and requirements;*
- *Fraud detection and prevention via rent/income monitoring;*
- *Housing inventory and development of program initiatives with emphasis on the housing of special needs group; and*
- *Make available accurate demographic information depicting tenant characteristics to Congress and other interested parties.*

The last update to the HUD-50058 and HUD-50058 MTW occurred in 2013. In 2016 the forms were renewed by OMB with no changes. There are no changes to those forms in this PRA request. There is no change to the burden hours since the 100 agencies that will cease to submit the HUD-50058, which is part of this information collection, that they currently utilize and will instead submit the HUD-50058 MTW Expansion.

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 50058 forms are submitted to IMS/PIC)
- None of these

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.

<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? Please check all that apply.</p>	<p><input type="checkbox"/> This program collects no personally identifiable information²</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) PHAs</p> <p>PHAs submit data on assisted households on the 50058 forms. Those households would be considered members of the public.</p>
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<p>4. What specific information about individuals is collected, generated or retained?</p>	
<p><i>Demographic, family profile, income and housing information. This information includes SSNs, names, full addresses, and income of participants of public housing and voucher programs.</i></p>	
<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>	<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: SSNs or resident alien ID on the 50058 forms</p>
<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>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><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</p> <p>Per REAC, IMS/PIC has a SORN available at Federal Register Volume 77, Number 72 (Friday, April 13, 2012) [Notices] [Pages 22337-22340] From the Federal Register Online via the Government Printing Office [http://www.gpo.gov/] [FR Doc No: 2012-8968] [[Page 22337]]</p>

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.

<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 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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.</p>
<p>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</p>	<ul style="list-style-type: none"> • Privacy Act of 1974, as amended, affords individuals the right to privacy in records that are maintained and used by Federal agencies (See http://www.usdoj.gov/foia/privstat.htm; see also HUD Handbook 1325.1 at www.hudclips.org); • Specific to IMS/PIC, Computer Matching and Privacy Protection Act of 1988, which amends the Privacy Act of 1974, specifies the conditions under which private information may or may not be shared among government agencies (See http://www.usdoj.gov/foia/privstat.htm); • Freedom of Information Act of 1966, as amended, (http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) provides for the disclosure of public information maintained by Federal agencies, while allowing limited protections for privacy [See also HUD's Freedom of Information Act Handbook (HUD Handbook) 1327.1 at www.hudclips.org];
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>In IMS/PIC, the SSNs submitted on the 50058 forms are used to accurately identify the individuals receiving assistance in order to verify reported income, detect fraudulent behavior and to mitigate the recipient illegally taking advantage of multiple HUD programs.</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 kept of communication traffic, please answer this question.</p>

4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.
n/a

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: IMS/PIC shares PII from the submitted 50058 forms with the EIV system.
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: IMS/PIC shares PII from the submitted 50058 forms with HHS & Social Security Administration
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Existing Please describe applicable information sharing governance in place: Per REAC, for IMS/PIC there are formal agreements involving exchange of data and payment for services.
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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: The PII is collected at the PHA level. They provide training and guidance to their employees.
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: Per REAC, for IMS/PIC the formal agreements between HUD, SSA and HHS specify

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.

	when and how often the information is exchanged on a scheduled basis.
9. Is there a FIPS 199 determination?⁴	<input type="checkbox"/> Unknown. <input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following: This is per REAC for IMS/PIC. Confidentiality: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High Integrity: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High Availability: <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Arlette Mussington
Date submitted to Program Privacy Office:	N/A
Date submitted to HUD Privacy Branch:	August 8, 2019
Program Privacy Liaison Officer Recommendation:	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
This PTA will suffice, however; if there are any changes, an update will be required.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	August 9, 2019
PTA Expiration Date:	August 9, 2019

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.

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 checked="" type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) 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:	System covered by existing PIA - PIA signed by Marcus Smallwood on 6/13/2017 If covered by existing PIA, 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: SORN – April 13, 2012 FR 337-2234 – Inventory Management System <i>Please describe rationale for privacy compliance determination above.</i> Click here to enter text.	

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 checked="" type="checkbox"/> Privacy Act Statement required. <i>Direct Approval</i> <input type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required. <i>with PIA/SORN</i> <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: 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: This PTA will suffice, 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 ENDORSMENT

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.

WENDY MCCOY

Digitally signed by WENDY
MCCOY
Date: 2019.07.30 07:56:42 -04'00'

07/30/2019

Date

SYSTEM OWNER

Wendy McCoy, Director

Business Modernization and Innovation Support
Solutions (BMISS), Real Estate Assessment Center
(REAC)



John Bravacos

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION

8/20/19
Date

