

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Public Housing 5-Year and Annual PHA Plan
OMB Control Number: 2577-0226**

**Office of Public Housing and Voucher
Programs**

Instruction & Template

8/28/19

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
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:	Public Housing 5-Year and Annual PHA Plan OMB Control Number: 2577-0226		
Program:	Public and Indian Housing (PIH)		
CSAM Name (if applicable):	Click here to enter text.	CSAM Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	October 21, 1998	Pilot launch date:	Click here to enter a date.
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:	Bernita James		
Office:	PIH	Title:	Housing Program Specialist
Phone:	202-402-7169	Email:	Bernita.C.James@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.

The Public Housing Agency (PHA) Plan was created by section 5A of the United States Housing Act of 1937 (42 U.S.C. 1437c-1). There are two different PHA Plans: the Five-Year Plan and the Annual Plan. The Five-Year Plan describes the agency's mission, long-range goals and objectives for achieving its mission over a five-year period. The Annual PHA Plan is a comprehensive guide to PHA policies, programs, operations, and strategies for meeting local housing needs and goals.

The PHA Plans informs HUD, residents, and the public of the PHA's mission for serving the needs of low, very low-income, and extremely low-income families and its strategy for addressing those needs. This information helps provide accountability to the local community for how PHAs spend their funding and implement their policies. Also, PHA plans allow HUD to monitor the performance of programs and the performance of public housing agencies that administer them.

HUD's most recent action in July 2016 was to post revise a version of this collection which OMB approved as a full revision incorporating public comments in 2013, and with minor changes in late 2014. Public commenters urged HUD to return to earlier multiple versions of PHA Plan templates by specific PHA type instead of a "One-Size Fits All" form. The 2016 forms were not made public due to ongoing changes of related policies.

With this current proposed information collection, HUD intends to further modify the HUD-50075-5Y, HUD-50075-ST, HUD-50075-SM, HUD-50075-HCV, HUD-50075-HP templates and HUD-50077 Civil Rights, PHA Plan, Related Regulations, and Consistency with State/local Consolidated Plan certifications in the following manner as needed without a major overhaul as was done for the 2016 approval:

- 1) Revise the instructions provided on the Assessment of Fair Housing (AFH) ensuring that program participants continue to conduct the Analysis of Impediments (AI) to fair housing until they are required to submit an AFH*
- 2) Create a new section on all certifications to give program participants the option to add an explanation when they cannot certify to being fully compliant with the stated regulations and*

As stated in the 2016 notice, due to the de-coupling of Capital Fund Program activities from PHA Plan submissions, the HUD-50075.1 and HUD-50075.2 Capital Fund Annual Statement/Performance and Evaluation Report and 5-Year Action Plan forms, and the associated burden hours (10,070) were removed will be removed from the approval for the PHA Plan under OMB no. 2577-0226 and added to the approval for the Capital Fund Program under OMB no. 2577-0157.

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

	<input type="checkbox"/> Web portal ¹ (e.g., SharePoint) <input type="checkbox"/> Contact Lists <input type="checkbox"/> Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD) <input checked="" type="checkbox"/> None of these
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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i></p>	<input checked="" type="checkbox"/> This program collects no personally identifiable information ² <input type="checkbox"/> Members of the public <input type="checkbox"/> HUD employees/contractors (list programs): <input type="checkbox"/> Contractors working on behalf of HUD <input type="checkbox"/> Employees of other federal agencies <input type="checkbox"/> Other (e.g. business entity)
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4. What specific information about individuals is collected, generated or retained?	
<i>This collection does not collect, generate or retain specific information about individuals.</i>	
<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>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<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>	<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

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.

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:	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? <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 data³ 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?	<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.)?	Choose an item. Please describe applicable information sharing governance in place:

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>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?</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: This Information Collection Request (ICR) collects no personally identifiable information <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input checked="" type="checkbox"/> Unknown. <input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

<p>Program Privacy Liaison Reviewer:</p>	<p>Click here to enter text.</p>
<p>Date submitted to Program Privacy Office:</p>	<p>Click here to enter a date.</p>
<p>Date submitted to HUD Privacy Branch:</p>	<p>Click here to enter a date.</p>
<p>Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i> Click here to enter text.</p>	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

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.

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:	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 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: 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: <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.

Bernita James

8-28-19

Date

SYSTEM OWNER

<< Bernita James /Housing Program Specialist>>

<< Public Housing Program >>

CHIEF PRIVACY OFFICER

Date

<<INSERT NAME/TITLE>>

OFFICE OF ADMINISTRATION