U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PRIVACY THRESHOLD ANALYSIS (PTA)

Electronic Line of Credit Control System (eLOCCS) System Access Authorization HUD Form 27054-E Collection

Office of the Chief Financial Officer

July 18, 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

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:	Electronic Line of Credit Control System (eLOCCS) System Access Authorization HUD Form 27054-E Collection		
Program:	Office of the Chief Financial Officer (OCFO)		
CSAM Name (if applicable):	N/A	**CSAM Number (if applicable):**	N/A
Type of Project or Program:	Form or other Information Collection	**Project or program status:**	Existing
Date first developed:	November 1, 2013	**Pilot launch date:**	N/A
Date of last PTA update:	October 25, 2016	**Pilot end date:**	N/A
ATO Status (if applicable)		**ATO expiration date (if applicable):**	N/A

PROJECT OR PROGRAM MANAGER

Name:	Joseph I. Hungate III		
Office:	OCFO	**Title:**	ACFO for Systems
Phone:	202-402-2801	**Email:**	Joseph.I.Hungate@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Simin D. Narins		
Phone:	202-402-3719	**Email:**	Simin.D.Narins@hud.gov

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Choose an item.
This information collection is necessary for grantees to gain access to the eLOCCS system. This information is also used as an internal control feature that's instituted to support and safeguard Federal funds, as well as provide a service to the recipients. This PTA is for the renewal of the eLOCCS access form. There have been no changes made to the access form.

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?** *Please check all that apply.*	☐ This program collects no personally identifiable information[2] ☒ 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)

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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, 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. What specific information about individuals is collected, generated or retained?

First, last, and middle name, title, telephone number, work mailing address, e-mail address, organization tax ID number, organization name.

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:	N/A
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	N/A
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 data³ is stored in the communication traffic log, please detail the data elements stored.	
N/A	

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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.

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: This is not a system
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: This is not a system
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	N/A
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:
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: Records can be requested via FOIA request. ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☒ Unknown. N/A – this is for a collection of information, not for a system, therefore a FIPS 199 system categorization is not applicable. ☐ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High Integrity: ☐ Low ☐ Moderate ☐ High Availability: ☐ Low ☐ Moderate ☐ High

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[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:	Simin D. Narins
Date submitted to Program Privacy Office:	July 11, 2019
Date submitted to HUD Privacy Branch:	July 17, 2019
Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
Approved.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	**Tina Macomson**
Date approved by HUD Privacy Branch:	July 18, 2019
PTA Expiration Date:	July 31, 2020

DESIGNATION

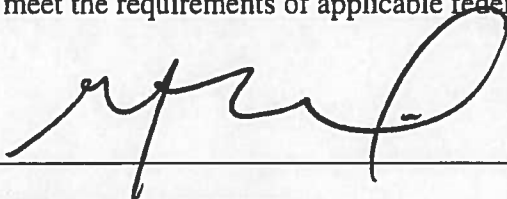| Privacy Sensitive System:	Yes If "no" PTA adjudication is complete.
Category of System:	Form/Information Collection If "other" is selected, please describe: Click here to enter text.
Determination:	☒ PTA sufficient at this time.
	☐ Privacy compliance documentation determination in progress.
	☐ New 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: 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: Forms included in this collection are, HUD-2328, HUD-92330-A HUD-2205-A, SF-425, HUD-2880, HUD-2993, HUD-2516, HUD- 4125 and HUD-4123. The information is used by contractors to obtain program benefits, consisting of distribution of insured mortgage proceeds when construction costs are involved. The information regarding completed work items is used by the Multifamily HUB Centers to ensure that payments from mortgage proceeds are made for work actually completed in a satisfactory manner.
Please describe rationale for privacy compliance determination above.

DOCUMENT ENDORSMENT

DATE REVIEWED: 7/18/19
PRIVACY REVIEWING OFFICIALS NAME: Tina Macomson

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.
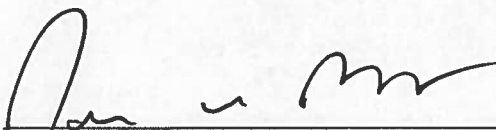
7/18/19
Date

PROGRAM OWNER George J. Tomchick III, Deputy CFO

for Joseph I. Hungate III
Assistant CFO for Systems
Office of the Chief Financial Officer

7/18/19
Date

John Bravacos
Senior Agency Official for Privacy
Privacy Branch
Office of Administration