

PRIVACY THRESHOLD ANALYSIS (PTA)
Active Partners Performance System (APPS)
F24P

OMB Control Number: 2502-0118

Previous Participation Certification

Multifamily Housing

Instruction & Template

October 2018

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/OMB #:	Active Partners Performance System (APPS) F24P		
Program:	Office of Housing		
CSAM Name (if applicable):	Active Partners Performance System	CSAM Number (if applicable):	1106
Type of Project or Program:	IT System	Project or program status:	Existing
Date first developed:	February 28, 2001	Pilot launch date:	NA
Date of last PTA update:	December 19, 2017	Pilot end date:	NA
ATO Status (if applicable)	Complete	ATO expiration date (if applicable):	March 10, 2021

PROJECT OR PROGRAM MANAGER

Name:	Devasia Karimpanal		
Office:	Business Relationships & Support Contracts Division	Title:	Program Manager
Phone:	(202) 402-7682	Email:	Devasia.V.Karimpanal@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Robert Anderson		
Phone:	202-402-3978	Email:	Robert.C.Anderson@hud.gov

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: New PTA

The Office of Housing and Urban Development Multifamily Housing Program is responsible for the Active Partners Participation System (APPS). APPS automates the submission and review of the HUD Previous Participation Certification (Form 2530). APPS services both HUD and Industry users and collects Personally identifiable information (PII) during its registration process.

APPS allows Industry partners to enter submissions and check on the status of submissions via the Internet and enables HUD staff to review submissions online for Multifamily Housing and Grant Administration, Residential Care Facilities, and Hospital Facilities. The implementation of APPS greatly reduces the paperwork burden and preparation time for form 2530 submission. APPS maintains and stores the industry information and incorporates it automatically into 2530 submissions enabling industry to create a submission with greater efficiency. APPS tracks submissions through each stage of the submission life cycle, checks the 2530 applicants and their principals against relevant information sources, and presents the findings automatically to the HUD reviewer. APPS also maintains a history of 2530 submissions and the principals in each industry entity allowing HUD to identify individuals and organizations that are participating or seek to participate in a role in multifamily properties.

The information collected is necessary for the proper performance of Multifamily Housing functions. An approved HUD-2530 submission is a prerequisite for industry partners to participate in HUD projects. APPS contains data concerning principal participants in multifamily housing projects, including their previous participation with HUD or other housing agencies. The information collected allows HUD employees to track non-compliance of multifamily project participants' by flagging the participants for non-compliance with regulatory and contractual agreements. Flags are also used to evaluate the risk of the participants prior to approval for future participation.

The records collected are all required to process certifications as defined by the systems operating authorities. The data is used to support loan applications and case-binder files (via lenders) — including borrower SSNs, salary, employment, race, loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD), loan default tracking, and property inspections.

The Privacy Threshold Analysis (PTA) is completed to be incorporated into the systems certification and authorization process. A Privacy Impact Assessment for the system was completed on July 10, 2017.

<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 the 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><i>Please check all that apply.</i></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)</p> <p>Industry, non-profit organizations</p>
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<p>4. What specific information about individuals is collected, generated or retained?</p>
<p>SSN, name, work/personal address, work/personal telephone number, work/personal email address.</p>

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.

<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. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Electronic records are retrieved by name, submission ID, and TIN</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. <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. The most recent notice was titled Amended System of Records Notice, Active Partners Performance System. The SORN was published in the Federal Register on July 29, 2016 at 81 FR 50000-50002.</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 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>	<p>The Department of Housing and Urban Development (HUD) is authorized to collect this information by law (42 U.S.C. 3535(d), and by regulation at 24 CFR Subpart H §200.210. HUD is authorized to collect the Social Security Number (SSN) by Section 165(a) of the Housing and Community Development Act of 1987, Public Law 100-242 (42 U.S.C. 3543).</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>The Housing and Community Development Act of 1987, 42 U.S.C. 3543 requires persons applying for a federally-insured or guaranteed loan to furnish his/her SSN for the identification of Participant records. This act, permits HUD to use SSNs for automated processing of and to make requests for information as required with other public agencies and private sector sources.</p>

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.	
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: 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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: <ul style="list-style-type: none"> • F24 - Integrated Real Estate Management System, Office of Program System Management • P104 - Web Access Security System, Office of the Chief Information Officer • P109 - Physical Assessment Sub-System, Departmental Real Estate Assessment Center
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Choose an item. Not applicable. Please describe applicable information sharing governance in place:
7. Does the project, program, or system provide role-based training for personnel who have access in addition	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:

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>to annual privacy training required of all HUD personnel?</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 type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p><input checked="" type="checkbox"/> Yes. In what format is the accounting maintained: APPS is backed up on a regularly scheduled basis to tape storage media. Backups are kept on-site at HUD Headquarters for a limited period of time, and then they are forwarded. APPS maintains an accounting of disclosures of PII through HUD's FOIA information system, which is located in HUD's Office of Administration.</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown.</p> <p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

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:	Vivian Herring, PRA Liaison, OPPAD
Date submitted to Program Privacy Office:	October 24, 2018
Date submitted to HUD Privacy Branch:	October 24, 2018
Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
N/A	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	October 24, 2018
PTA Expiration Date:	This PTA will suffice, however, if there are any changes, an update will be required.

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 type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) 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 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: <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSEMENT

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.

SYSTEM OWNER

Winfred Chan

Office of Program System Management

Date

CHIEF PRIVACY OFFICER

John Bravacos

Senior Agency Official for Privacy
Privacy Branch

Date