



**Homeland
Security**

The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
703-235-0780, pia@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
Version date: June 10th, 2009
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PRIVACY THRESHOLD ANALYSIS (PTA)

**This form is used to determine whether
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards
Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSOnline and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.



PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.
Upon receipt, the DHS Privacy Office will review this form
and may request additional information.

SUMMARY INFORMATION

DATE submitted for review: February 18, 2010

NAME of Project: Form I-854, Inter-Agency Alien Witness and Informant Record

Name of Component: US Citizenship and Immigration Services

Name of Project Manager: Essie L. Bell

Email for Project Manager: essie.bell@dhs.gov

Phone number for Project Manager: 202-272-8035

TYPE of Project:

- Information Technology and/or System[□]
- A Notice of Proposed Rule Making or a Final Rule.
- Other: <Information Collection Request

[□] The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

- “Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

- “Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



SPECIFIC QUESTIONS

1. Describe the project and its purpose:

The form is used by law enforcement agencies to bring alien witnesses and informants to the United States in an "S" non-immigrant classification.

The form provide Department of State (DoS) and DHS with information necessary to identify the requesting LEA, the alien witness and/or informant, and others, e.g., The United States Attorney, needing the information or testimony of that alien. It assists DoS and USCIS in the exercise of their joint responsibility to adjudicate requests by LEAs for S classification.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: March 31, 2007

This is an extension of an ICR that expires 03/31/2010

3. Could the project relate in any way to an individual?¹

No. Please skip ahead to the next question.

Yes. Please provide a general description, below.

The form collects full name, address, date and place of birth, occupation and phone number.

4. Do you collect, process, or retain information on: (Please check all that apply)

DHS Employees

Contractors working on behalf of DHS

The Public

¹ Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.



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The System does not contain any such information.



5. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)

No.

Yes. Why does the program collect SSNs? Provide the function of the SSN and the

legal authority to do so:

6. What information about individuals could be collected, generated or retained?

The form collects an alien full name, address, date and place of birth, citizenship, marital status and occupation.

7. If this project is a 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 the next question.

Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

Yes. What type of data is recorded in the log? (Please choose all that apply.)

Header

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

8. Can the system be accessed remotely?

No.

Yes. When remote access is allowed, is the access accomplished by a virtual private network (VPN)?

No.

Yes.



9. Is Personally Identifiable Information² physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)

No.

Yes.

10. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems³?

No

Yes. Please list:

11. Are there regular (ie. periodic, recurring, etc.) data extractions from the system?

No.

Yes. Are these extractions included as part of the Certification and Accreditation⁴?

Yes.

No.

12. Is there a Certification & Accreditation record within OCIO's FISMA tracking system?

Unknown.

No.

Yes. Please indicate the determinations for each of the following:

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

² Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

³ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in TAFISMA.

⁴ This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)



PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office:

NAME of the DHS Privacy Office Reviewer: <Please enter name of reviewer.>

DESIGNATION

This is NOT a Privacy Sensitive System - the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System
Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other:

Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
 - System covered by existing PIA:
 - A new PIA is required.
 - A PIA Update is required.
- A SORN is required
 - System covered by existing SORN:
 - A new SORN is required.

DHS PRIVACY OFFICE COMMENTS