



**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 10<sup>th</sup>, 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](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto: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:**

**NAME of Project: Civil Surgeon Designation**

**Name of Component: US Citizenship and Immigration Services**

**Name of Project Manager: Kevin Hignam/Meddie Brown**

**Email for Project Manager: Kevin Higman@dhs.gov/Meddie.brown@dhs.gov**

**Phone number for Project Manager: (202) 272 8206/ 202 272 1103**

**TYPE of Project:**

**Information Technology and/or System\***

**A Notice of Proposed Rule Making or a Final Rule.**

**Other: The civil surgeon designation information collection is submitted to OMB to comply with the regulatory requirements in the proposed fee rule: U.S. Citizenship and Immigration Services Fee Schedule, XXXXXXXX.**

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\* 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.



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## SPECIFIC QUESTIONS

### 1. Describe the project and its purpose:

Section 212(a)(1)(A) of the Immigration and Nationality Act (the Act) renders individuals inadmissible if the individual is afflicted with the statutorily mentioned diseases or medical conditions. In order to establish that the individual is inadmissible when seeking adjustment of status to a legal permanent resident (and in certain cases, aliens seeking an immigration benefit) the individual must submit Form I-693, Report of Medical Examination and Vaccination Record, that is completed by a USCIS designated physician, or "civil surgeon." The statutory basis for civil surgeons and the medical examination of aliens is contained in section 232 of the Act and 8 CFR 232.2. To be selected as a civil surgeon, the physician has to demonstrate that he or she is a licensed physician with no less than 4 years of professional experience.

Civil surgeons are currently designated by USCIS District Directors. 8 CFR 232.2. The civil surgeon submits a request for designation by writing to the District Director in the USCIS jurisdiction in which the civil surgeon would like to complete immigration medical examinations. Once the designation is granted, the point of contact for the civil surgeon in a District office creates a file for the civil surgeon that is retained in that office. The point of contact also forwards the doctors name, office address, office phone number to USCIS HQ/Customer Service Directorate (CSD) so that the civil surgeon can be included in the "Civil Surgeon" locator. The civil surgeon locator is a list of designated physicians that can be accessed by USCIS customers via the IVR telephone system and its website.

The civil surgeon list is maintained on a Data Performance Warehouse (SQL Server 2005 Database) that is supported by Serco, Inc., a contractor for USCIS/CSD. The data stored on the Data Performance Warehouse and displayed via the IVR telephone system and USCIS's website (doctor's name, practice, street address, phone number, and local office jurisdiction), is comparable to information that would be available in a local phone directory. Additional information contained on the Data Performance Warehouse is: the date of a physician's designation, the date of the revocation, a brief annotation as to the reason of the annotation; and the date of any reinstatement. This information is not displayed via the IVR telephone system and its website; the information is only displayed on the DHS Intranet website and within USCIS's Adjudicator's Tool Box.

### 2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed:



Date last updated:

The data for the Data Performance Warehouse is updated continuously on an ad hoc basis.

**3. Could the project relate in any way to an individual?<sup>1</sup>**

- No. Please skip ahead to the next question.
- Yes. Please provide a general description, below.

Individual physicians apply for civil surgeon designation.

The data that is stored on the Data Performance Warehouse is comparable to what would be available in a local phone directory.

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

- DHS Employees
- Contractors working on behalf of DHS
- The Public
- The System does not contain any such information.

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<sup>1</sup> 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.



**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?**

Name; Address; Phone Number; e-mail; Practice's Name, Practice's Address, Practice's Phone and e-mail, URLs, State Medical License Number(s); Adverse actions taken by the medical license authority (as published on the website of the medical licensing authority); Name and address of former employer(s); Immigration status (US citizen/national, lawful permanent resident, nonimmigrant); Signature of the physician.

USCIS does currently not employ the use of information technology in collecting and processing information provided with an application for a request for civil surgeon designation.

Information in the Data Performance Warehouse includes: doctor's name and practice's, street address, phone number, and local office jurisdiction; date of designation, date of revocation, and the reason for revocation, as well as the date of reinstatement.

The Data Performance Warehouse has not undergone a certification and accreditation process under the USCIS ITLM process.

**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 Information<sup>2</sup> physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)**

No.

Yes. For the designation process: currently, a physician seeking civil surgeon designation will apply by sending an informal request for civil surgeon designation to the District Director. The request is made either in paper or via e-mail (if available). The information is stored in either a paper file, or in computer file created by the local point of contact for civil surgeons. Information, such as name, address, and phone number, date of acceptance as a civil surgeon, and if, any annotation as to the reason for revocation or removal from the list (once the revocation of the designation or the removal is requested) is transmitted via e-mail to a POC at USCIS HQ, who transmits the information to Serco Inc., a DHS contractor. Serco Inc. creates a roster with information relating to the entries mentioned above. The list is stored in the "Data Performance Warehouse" that is set up by Serco, Inc.

In relation to the Data Performance Warehouse: The response to the question is no.

Serco, Inc. transmits periodic updates to the civil surgeon list to Verizon Business (for inclusion on the USCIS telephone help line), IBA (for inclusion on the USCIS website), and the USCIS OIT (for inclusion on DHS Online). There is no direct connection between the Data Performance Warehouse and the other entities; the updates are performed by transmitting commadelimited, text files to these entities. There is no direct connection between the Data Performance Warehouse and the USCIS IT systems. Only designated parties from Serco, Inc. and USCIS can

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<sup>2</sup> 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.



gain access to the front end web-server for the Data Performance Warehouse to view the data. Access requires a unique user ID and password.

**10. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems<sup>3</sup>?**

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 Accreditation<sup>4</sup>?

Yes.

No. Once a year, Serco, Inc. verifies that the information in the Data Performance Warehouse is accurate by contacting every civil surgeon listed in the Data Performance Warehouse. This will ensure that the information contained in USCIS' telephone system for civil surgeons and USCIS' website (Civil Surgeon Locator) is accurate. If a civil surgeon cannot be reached, despite several attempts to contact the civil surgeon, the civil surgeon will be deleted from the Data Performance Warehouse.

**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

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<sup>3</sup> 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.

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





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Availability:

Low  Moderate  High  Undefined



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

**DATE reviewed by the DHS Privacy Office: March 24, 2010**

**NAME of the DHS Privacy Office Reviewer: Rebecca J. Richards**

### 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: Form

#### 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: USCIS CLAIMS 3 PIA
  - A new PIA is required.
  - A PIA Update is required.
- A SORN is required
- System covered by existing SORN: DHS/USCIS-007
  - A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS