



**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:

NAME of Project: FOIA/PA Information Processing System (FIPS)

Name of Component: US Citizenship and Immigration Services

Name of Project Manager: Lawrence Carter

Email for Project Manager: Lawrence.Carter@dhs.gov

Phone number for Project Manager: 202-272-9213

TYPE of Project:

Information Technology and/or System*

A Notice of Proposed Rule Making or a Final Rule.

Other: <Please describe the type of project including paper based Privacy Act system of records.>

* 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 Freedom of Information Act/Privacy Act (FOIA/PA) Information Processing System (FIPS) enables Office of Records Services personnel to efficiently and effectively respond to more than 130,000 FOIA/PA requests annually. FIPS uses document imaging, workflow and client-server technologies to manage the FOIA/PA case life cycle for USCIS. FIPS generates automated letters and reports, with flexible workflow, rigorous first-in-first-out (FIFO) processing and accurate audit trails. Government personnel and their contractors are able to review electronically scanned images of documents responsive to FOIA requests to ascertain whether FOIA exemptions may be applied.

Based on previous conversations with the USCIS Privacy Officer it was determined that this system is legacy and will not require its own PIA.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: August 1, 1998

Date last updated: July 20, 2009

Minor software changes in response to a System Change Request (SCR).

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.

FOIA requests for USCIS records could include requests for an A-File or for a DHS employee personnel file.

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

DHS Employees

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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- Contractors working on behalf of DHS
- The Public
- 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:

<Please provide the function of the SSN and the legal authority to do so.>

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

Individuals submitting FOIA or PA requests may submit all or some of the following information in order to have their request fulfilled:

- Name
- Date of Birth
- Mailing Address
- Phone Numbers (e.g., phone, fax, and cell)
- Certificates (e.g., birth, death, and marriage)
- Email Address
- Alien Number (A-Number)
- Country or Place of Birth

This information, which is provided directly by the individual, is entered into the system. The only mandatory information is the requester's name, mailing address and the information being requested. Any additional information provided is used to assist in identifying and locating the specifically requested material.

Responsive records obtained from other USCIS System of Records pertinent to the request are scanned into the system. Such records may include the following information:

- Name
- Date of Birth
- Social Security Number (or other number originated by a government that specifically identifies an individual)
- Photographic Identifiers (e.g., photograph image, x-rays, and video tapes)
- Driver's License
- Biometric Identifiers (e.g., fingerprint and voiceprint)



- Mother's Maiden Name
- Vehicle Identifiers (e.g., license plates)
- Mailing Address
- Phone Numbers (e.g., phone, fax, and cell)
- Certificates (e.g., birth, death, and marriage)
- Legal Documents or Notes (e.g., divorce decree, criminal records, or other)
- Email Address
- Education Records
- Alien Number (A-Number)
- Financial Records

In addition to information provided directly by the individual, the system maintains electronic copies of correspondence with the individual or his/her representative, and digital image copies of responsive material (most typically, genealogy and/or A-file material).

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:

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)



Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined



PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: December 23, 2009

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:

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: DHS/ALL-001
 - A new SORN is required.

DHS PRIVACY OFFICE COMMENTS



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PIA will be required for next major change or update to system per previous discussions.