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: April 27, 2010
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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 from the component Privacy Office, 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 DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

DATE submitted for review: July 15, 2010

NAME of Project: Form I-751, Petition to Remove Conditions on Residence.

Name of Component: US Citizenship and Immigration Services

Name of Project Manager: Essie 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.**

☒ **Form or other Information Collection.**

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

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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:**

   Form I-751 will be used by USCIS to verify the petitioner's status and determine whether the conditional resident is eligible to have his or her status removed.

2. **Status of Project:**

   ☐ This is a new development effort.

   ☒ This is an existing project.

   > Date first developed:

   > Date last updated: 06/30/2010

   > <Please provide a general description of the update.>

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.

   Yes the information requested relate to an individual (applicant) requesting temporary protected status.

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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[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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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:

   The social security number is necessary to adjudicate the application.

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

   Name, Address, Date of Birth, A-number, Telephone Number.

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. **Does the system connect, receive, or share Personally Identifiable Information with any other
   DHS systems[2]?**

   ☒ No.

   ☐ Yes.

   Please list:

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

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[2] 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.

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☒ 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

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PRIVACY THRESHOLD REVIEW
(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DATE reviewed by the DHS Privacy Office: 7/26/2010

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.

        ☒ PIA is required.

            ☒ System covered by existing PIA: CLAIMS

            ☐ New PIA is required.

            ☐ PIA update is required.

        ☐ SORN not required at this time.

        ☒ SORN is required.

            ☒ System covered by existing SORN: USCIS-007

            ☐ New SORN is required.

DHS PRIVACY OFFICE COMMENTS