



**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: March 4, 2010**

**NAME of Project: Form I-566, Inter-agency record of individual requesting change/adjustment to or From A or G Status; or Requesting A, G, or NATO Dependent Employment Authorization**

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

**Name of Project Manager: Julia Kennedy**

**Email for Project Manager: Julia.Kennedy@dhs.gov**

**Phone number for Project Manager: 202-272-1344**

**TYPE of Project:**

- Information Technology and/or System\***
- A Notice of Proposed Rule Making or a Final Rule.**

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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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**Other: The Form I-566 is being revised to comply with the regulatory requirements in the Interim Rule: Employment Authorization for Dependents of Foreign Officials.**



## SPECIFIC QUESTIONS

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

The Form I-566 is used by Department of State (DOS) to certify to USCIS eligibility of dependents of A or G principals requesting employment authorization, as well as for North Atlantic Treaty Organization/Headquarters, Supreme Allied Commander Transformation (NATO/HQ SACT) to certify to USCIS similar eligibility for dependents of NATO principals. DOS also uses this form to certify to USCIS that certain A, G or NATO non-immigrants may change their status to another nonimmigrant status. USCIS, on the other hand, uses data on this form in the adjudication of change or adjustment of status applications from aliens in A, G, or NATO classifications, and following any such adjudication informs DOS of the results by use of this form.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: March 16, 2009

The interim rule requires amendments to the Form I-566 to expand the list of dependents who are eligible for employment authorization to include any alien recognized by the Department of State as an immediate family member of a foreign official.

**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.

U.S. Citizenship and Immigration Services (USCIS) requires eligible dependents of A-1, A-2, G-1, G-3, G-4 or NATO 1-7 non-immigrants to use this form in connection with their applications for employment authorization. Foreign government diplomats and officials and their personal employees (classified as A-1, A-2 and A-3), representatives of international

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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.



organizations and their personal employees (classified as G-1 through G-5), and officials or employees of the North Atlantic Treaty Organization and their personal employees (classified as NATO-1 through NATO-7) use this form in connection with their, or their family member's, request to change to another nonimmigrant classification or to adjust their nonimmigrant status to lawful permanent resident 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.



**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:

USCIS routinely collects Social Security Numbers as part of the adjudication process. Aliens who are applicants will already have been issued Social Security Numbers as this relates to employment in the U.S. The INA provides authority to collect this data. The SSN may be used in the collection of biometrics and providing record checks on individual applicants if the applicant is in the US at the time of filing the application for classification.

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

Name, Addresses, Date of Birth, Nationality, SSN, DOS Personal Identification Number, I-94 Number, Alien Registration Number, Place of birth, country of birth.

**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.

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.

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

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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.

<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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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: May 10, 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: Information Collection 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:
- 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



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The I-566 is not entered into an electronic system; therefore a PIA is not required. DHS/USCIS-007. If the I-566 is approved, USCIS will process the I-765. The I-765 is covered by the CLAIMS 3 PIA. Please work with USCIS Privacy to review and revise the Privacy Act e(3) statement on this form.