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.

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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 23, 2010

NAME of Project: Form G-646, Sworn Statement of Refugee Applying for Admission into the United States

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**

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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:**

   The data collected on this form is used by the USCIS to determine eligibility for the admission of applicants to the United States as refugees. The form serves the purpose of ensuring that basic information required to assess eligibility is provided to petitioners, and standardizing requests for the benefit. The use of this form provides the most efficient means for collecting and processing the required data. In this case the DHS does not employ the use of information technology in collecting and processing information. The DHS does not have the automated capability in place to accept the electronic submission of applications. In addition, most refugee processing occurs in remote areas without access to such information technology.

2. **Status of Project:**

   ☐ This is a new development effort.

   ☒ This is an existing project.

   > Date first developed:

   > Date last updated: March 23, 2009

   > This is an extention of an ICR that expires 04/30/2010

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, email address, A-number, 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

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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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☐ The System does not contain any such information.

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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:

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

    The form collects an full name, email address, A-number and phone 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. **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.

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9. **Is Personally Identifiable Information[2] 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[3]?**

    ☒ 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[4]?

    　　☐ 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

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[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)

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PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: February 25, 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:

    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 IDDMP PIA

            ☐ A new PIA is required.

            ☐ A PIA Update is required.

        ☒ A SORN is required

            ☒ System covered by existing SORN: DHS/USCIS-001

            ☐ A new SORN is required.

DHS PRIVACY OFFICE COMMENTS