



**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: 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](http://www.dhs.gov/privacy), on DHSConnect and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

DATE submitted for review: **[PRIVACY WILL COMPLETE THIS PORTION]**

NAME of Project: Form I-601

Name of Component: U.S. Citizenship and Immigration Services

Name of Project Manager: Essie Bell

Email for Project Manager: [essie.bell@dhs.gov](mailto: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:

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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.



## SPECIFIC QUESTIONS

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

This form provides a method for applicants, whose applications for naturalization are denied, to request a new hearing by an Immigration Officer of the same or higher rank as the denying officer, within 30 days of the original decision.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: 4/30/2009

This is a request to extend the use of the Form I-601 under the Paperwork Reduction Act. The form is set to expire on April 30, 2011.

**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.

An alien who is ineligible to be admitted to the United States as an immigrant or to adjust status in the United States, and certain nonimmigrant applicants who are inadmissible, can complete and submit this form to seek a waiver of certain grounds of inadmissibility.

**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.



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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:

USCIS collects the SSN to facilitate and expedite the adjudication of this request for a waiver. INA 264(f) (8 U.S.C. 1304(f)), states, "Alien's social security account number Notwithstanding any other provision of law, the Attorney General is authorized to require any alien to provide the alien's social security account number for purposes of inclusion in any record of the alien maintained by the Attorney General or the Service." With regard to the collection of SSN from aliens, 264(f) provides USCIS with the authority to collect SSN's. USCIS has determined to collect SSN through Form I-601 on voluntary-basis by indicating in the form that providing this type of information is optional. USCIS does not plan to use the SSN as a unique identifier.

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

Complete Name; Address; Date of Birth; Country and City/Province-State of Birth and of Citizenship/Nationality; USCIS Alien Registration Number; Social Security Number; Telephone Number; criminal conviction and medical information and records.

**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.

**8. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems<sup>2</sup>?**

No.

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<sup>2</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.



Yes.

Please list:

**9. 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



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

**DATE reviewed by the DHS Privacy Office: March 30, 2011**

**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 3
  - New PIA is required.
  - PIA update is required.
- SORN not required at this time.
- SORN is required.
  - System covered by existing SORN: DHS/USCIS-007
  - New SORN is required.

**DHS PRIVACY OFFICE COMMENTS**