



**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:** December 8, 2009

**NAME of Project:** Humanitarian Adjudication for Victims, Enterprise, Nationwide (HAVEN)

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

**Name of Project Manager:** Brian Peyrat

**Email for Project Manager:** brian.peyrat@dhs.gov

**Phone number for Project Manager:** (802) 527- 4712

**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.>**

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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:**

The Vermont Service Center (VSC) is using an MS Access database to adjudicate the immigration forms associated with the Violence Against Women Act (VAWA). The forms include, but are not limited to, I-914, I-918, I-929.

Recently, VSC Office of Information Technology (OIT) was tasked to convert the existing MS database into a modern application using the Standard Lightweight Operational Programming Environment (SLOPE) programming environment (development tool). SLOPE is a platform on which other applications may be developed and hosted. The Humanitarian Adjudication for Victims, Enterprise, Nationwide (HAVEN) database will be designed to facilitate VSC's ability to administer and adjudicate petitions for VAWA benefits in a timely and efficient manner.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed: January 1, 2002

Date last updated: November 1, 2009

The current HAVEN database is an MS access database. The VSC developers are building an interim solution in an SQL database until the final project, HAVEN can be brought on line.

**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.

HAVEN will contain sensitive PII from individuals applying for benefits under the VAWA of 1994.

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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.



**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 collects the SSN (if available) of the self-petitioner to process the petition associated with VAWA. VSC uses the provided SSN to locate the self-petitioner's A-number, if the A-number was not provided in the petition.

The legal authority to collect SSN is derived from the Immigration and Nationality Act.

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

The HAVEN database will maintain information derived from the immigration forms for VAWA benefits. These data elements include the self-petitioner's name, safe address (not necessarily the petitioner's residential address, but it could be the address of the attorney or representative), gender, marital status, country and date of birth, country of citizenship, passport number, passport issue date, passport issue place, I-94 number, date of last entry, place of last entry, and current status.

**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. Teleworkers process VAWA forms at remote locations (i.e., approved work location, such as home). This data is not loaded onto "mobile devices."

**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>?

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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.



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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<sup>4</sup> This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

**DATE reviewed by the DHS Privacy Office:** December 10, 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:
- A new SORN is required.

### DHS PRIVACY OFFICE COMMENTS

SORN Determination will be made during the PIA process