



**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 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.



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: July 29, 2010

NAME of Project: America's Literacy Directory

Name of Component: US Citizenship and Immigration Services

Name of Project Manager: Rachael M. Shaw

Email for Project Manager: rachael.m.shaw@dhs.gov

Phone number for Project Manager: 202-272-1361

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.>

* 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:

Project Description on America's Literacy Directory: U.S Citizenship and Immigration Services Office of Citizenship (OoC) entered into an inter-agency agreement with the National Institute for Literacy (NIFL) to expand America's Literacy Directory, www.literacydirectory.org, with information on organizations that offer citizenship preparation services. To accomplish this task, the OoC would like to use the email addresses obtained from Citizenship Toolkit recipients and Civics and Citizenship Training Workshop registrants to encourage individuals to add their program's and/or organization's information on the America's Literacy Directory. NIFL and its contractor, L-3 Communications, maintain the information contained within America's Literacy Directory.

Information on OoC's Citizenship Toolkit: For the Civics and Citizenship Toolkit, recipients must visit www.citizenshiptoolkit.gov and register to receive a copy of the Toolkit. The Government Printing Office (GPO) hosts the Toolkit website and receives the initial registrations. On a weekly basis, GPO provides that list to the OoC. The OoC gives it an initial look and then shares it with Karyn Dubie in the Eastern Forms Center. Karyn's team scrubs the list for any duplicates (programs can only receive one free copy of the Toolkit) and then distributes the Toolkits. Currently, the Eastern Forms Center has collected, in an Excel spreadsheet, over 10,000 toolkit recipients' information (to include email addresses).

Information on OoC's Civics and Citizenship Training Workshops: The OoC provides national in-person trainings to volunteers and adult educators on naturalization test preparation to help them better serve their immigrant adult learners. Participants must register for these trainings at <http://www.uscis.gov/teachertraining>. The OoC collects registration information (to include participant's email addresses) and inputs the information into an Excel spreadsheet. To date, around 3500 people have registered for a Civics and Citizenship Training workshop.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated:



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 Office of Citizenship would be contacting individuals (who registered for a Toolkit or who registered for a Training Workshop) via email to inform them about inputting their program's information on the America's Literacy Directory.

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.

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.



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:

<Please 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 Office of Citizenship collects names, email addresses, occupations, and physical addresses to ship the Civics and Citizenship Toolkit and to register participants for the Civics and Citizenship Training Workshops. Although the Office of Citizenship had prior approval to collect this information, the Office of Citizenship would like to contact the Toolkit recipients and Training Workshop registrants via email to promote the America's Literacy Directory.

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 Information² 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 systems³?**

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 Accreditation⁴?

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

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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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: August 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:

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: Stakeholder Engagement Initiative: Customer Relationship Management
 - A new PIA is required.
 - A PIA Update is required.
 - A SORN is required
 - System covered by existing SORN: DHS/ALL-002
 - A new SORN is required.

DHS PRIVACY OFFICE COMMENTS



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