



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, 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, on DHSConnect and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Date Submitted for Review: 03/23/2011

Name of Project: Alien Change of Address Card (AR-11)

System Name in TAFISMA: AR-11

Name of Component: USCIS

Name of Project Manager: Dominick Gentile

Email for Project Manager: dominick.gentile@dhs.gov

Phone Number for Project Manager: 202-272-8886

Type of Project:

- Information Technology and/or System.*
- A Notice of Proposed Rule Making or a Final Rule.
- Form or other Information Collection.
- Other:

* 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 AR-11 is a computerized system that supports the information management needs of the DHS in carrying out its' mission. Specifically, it tracks address changes submitted to USCIS on the paper Form AR-11 and online through the Customer Relationship Interface System's (CRIS) Change of Address (CoA) component. AR-11 contains current addresses on all non-U.S. citizens who are currently in the United States who have submitted an electronic or paper Form AR-11 as required by Section 265 of the Immigration and Nationality Act (INA), (8 U.S.C. 1305). AR-11 interfaces with CoA to accept address changes submitted via the Internet.

There are more than 34,000 AR-11 users. AR-11 consists of two components: the on-line and the batch system. The AR-11 uses the on-line system at DHS offices throughout the U.S. and in numerous foreign countries to retrieve current address information on non-U.S. citizens staying in the U.S. On an average day, there are 3 to 5 hundred accesses to the on-line application. The AR-11 batch system is used to update the AR-11 database from a daily feed provided by the data entry contractor and the CRIS COA component. The system allows a maximum of 580 concurrent user logons. The AR-11 on-line system contains information starting in 2002. The batch system is also used to *ad hoc* reports.

AR-11 was implemented on July 15, 2002. AR-11 is located on a Multiple Virtual Storage mainframe platform at the Department of Justice (DoJ) Data Center in Dallas, TX. Information is maintained in Computer Associates' Integrated Data Management System (IDMS) database management system.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: July 15, 2002

Date last updated: October 11, 2007

The AR-11 functionality has not ever been updated since its inception. AR-11 Release 1.1 included one modification to support electronic AR-11 forms being submitted through the internet by individuals using the Customer Relationship Interface System (CRIS), Alien Change of Address (CoA) Component. AR-11 Release 1.1 encompasses the following SCR:

SCR 551 – Job Control Language (JCL) modifications to support the new AR-11 CRIS web entry project.



3. From whom 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.

4. 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:

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

Last, first, and middle names

Birth date

Country of citizenship code

A-number

Fingerprint identification number system number

Admission number

Current address: street address, city, state, and zip code

Last address: street address, city, state, and zip code

Current employer

Employer address: street address, city, state, and zip code

Point of entry code

Entry date

Visa expiration date

6. 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.



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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.>

7. Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems¹?

No.

Yes.

Please list: Customer Relationship Interface System (CRIS), Alien Change of Address (CoA) Component.

8. 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

¹ 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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

Date reviewed by the DHS Privacy Office: May 5, 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:

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: AR-11 PIA
 - 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.



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DHS PRIVACY OFFICE COMMENTS