



**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](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: March 4, 2011**

**NAME of Project: Form G-28 and G-28I**

**System Name in TAFISMA:**

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

**Name of Project Manager: Essie 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.

Form or other Information Collection.

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:**

8 CFR 103.2 and 8 CFR 292.1 allow persons entitled to representation to be represented in matters before U.S. Citizenship and Immigration Services, U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection, Department of Homeland Security (DHS). Representatives must file an appearance on the appropriate form in each case.

The data collected on Forms G-28 and G-28I are used by DHS to determine eligibility of the individual to appear as a representative. Form G-28 is used by attorneys admitted to practice in the United States and accredited representatives of charitable organizations recognized by the Board of Immigration Appeals. Form G-28I is used by attorneys admitted to the practice of law in countries other than the United States and only in matters in DHS offices outside the geographical confines of the United States.

**2. Status of Project:**

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated: April 22, 2009

Form G-28 and G-28I were revised.

**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:

<Please provide the function of the SSN and the legal authority to do so.>



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

Name, Address (Street, and E-Mail) and Account Identifier.

**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.

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 systems<sup>1</sup>?**

No.

Yes.

Please list:

**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

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<sup>1</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.



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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: March 11, 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-001, DHS/USCIS-007
  - New SORN is required.

**DHS PRIVACY OFFICE COMMENTS**