



## **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:

Senior Director, Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your 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@hq.dhs.gov](mailto:pia@hq.dhs.gov), phone: 202-343-1717.



## PRIVACY THRESHOLD ANALYSIS (PTA)

### SUMMARY INFORMATION

<b>Project or Program Name:</b>	Feedback USA Pilot		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office or Program:</b>	Field Operations Directorate
<b>Xacta FISMA Name (if applicable):</b>	N/A	<b>Xacta FISMA Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Pilot
<b>Date first developed:</b>	August 1, 2015	<b>Pilot launch date:</b>	May 1, 2016
<b>Date of last PTA update</b>	April 8, 2016	<b>Pilot end date:</b>	June 30, 2016
<b>ATO Status (if applicable)</b>	N/A	<b>ATO expiration date (if applicable):</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Michael C Biggs		
<b>Office:</b>	FOD District 22	<b>Title:</b>	Special Assistant
<b>Phone:</b>	202 746 5059	<b>Email:</b>	<a href="mailto:Michael.C.Biggs@uscis.dhs.gov">Michael.C.Biggs@uscis.dhs.gov</a>

### INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

<b>Name:</b>	N/A		
<b>Phone:</b>	N/A	<b>Email:</b>	N/A



## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: New PTA

USCIS is submitting this PTA for the Feedback USA Button – Department of Homeland Security (DHS)/U.S. Citizenship and Immigration Services (USCIS) Pilot Survey, which is intended to run for two months beginning in May 2016.

USCIS seeks to participate in an OMB sponsored pilot project managed by the General Services Administration (GSA). OMB and GSA are partnering with agencies to pilot the Feedback USA Button– a simple tool to collect customer feedback and:

- Provide agencies with information needed to improve program delivery;
- Provide the Executive Branch with insight into best practices and areas to improve; and
- Provide the public with transparency around the quality of services provided.

USCIS will conduct the survey at 20 participating field offices. USCIS plans to install 2 kiosks at each field office. When a customer visits the participating field office for the purpose of seeking information or for an immigration adjudication interview. At the conclusion of the customer’s appointment, an employee who interacts directly with the customer will inform the customer of the option of providing feedback on his or her experience. The customer can voluntarily enter feedback by using the onsite kiosk to answer the question with the additional option to provide free-form text on the website.

The kiosk is a simple electronic device with one question listed at the top of its screen. The respondent’s response is a series of four smiley-face emoticons ranging from happy to sad. The kiosks will be placed in 20 of our USCIS field offices. We will ask one of two questions at the kiosk. “How did we do today?” “How would you rate your experience today?”

### 2. Does this system employ any of the following technologies:

*If you are using any of these technologies and want coverage under the respective PIA for that technology please stop here and contact the DHS Privacy Office for further guidance.*

- Closed Circuit Television (CCTV)
- Social Media
- Web portal<sup>1</sup> (e.g., SharePoint)
- Contact Lists
- None of these

<sup>1</sup> Informational and collaboration-based portals in operation at DHS and its components that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or “potential members” who seek to gain access to the portal.



<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b> <i>Please check all that apply.</i></p>	<p><input checked="" type="checkbox"/> This program does not collect any personally identifiable information<sup>2</sup></p> <p><input type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> DHS employees/contractors (list components):</p> <p><input type="checkbox"/> Contractors working on behalf of DHS</p> <p><input type="checkbox"/> Employees of other federal agencies</p>
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>	
<p>The kiosks retain customer opinions in the form of their response to one question listed at the top of its screen. The respondent's response is a series of four smiley-face emoticons. We will ask one of two questions at the kiosk. "How did we do today?" "How would you rate your experience today?" The information will be collected in the waiting areas of 20 USCIS Field Offices. All responses are anonymous and not tied to a specific appointment. The response is uploaded daily to a secured website accessible only by designated USCIS employees and members of the GSA Feedback USA management team.</p>	
<p><b>4(a) Does the project, program, or system retrieve information by personal identifier?</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p>
<p><b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.</p>
<p><b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b></p>	<p>N/A</p>
<p><b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>N/A</p>
<p><b>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b></p>	<p><input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.</p>

<sup>2</sup> DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



<i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	
<b>4(f) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b>	
The system stores the response to the single question about customer service. The question is answered by choosing from among four smiley faces ranging from happy to unhappy. No language data is stored. The system also provides the time and location of the response.	

<b>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <a href="#">Click here to enter text.</a>
<b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b>	N/A
<b>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all DHS personnel?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
<b>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?</b>	<input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: N/A <input type="checkbox"/> Yes. In what format is the accounting maintained:
<b>9. Is there a FIPS 199 determination?<sup>4</sup></b>	<input type="checkbox"/> Unknown.

<sup>3</sup> When data is sent over the Internet, each unit transmitted includes both header information and the actual data being sent. The header identifies the source and destination of the packet, while the actual data is referred to as the payload. Because header information, or overhead data, is only used in the transmission process, it is stripped from the packet when it reaches its destination. Therefore, the payload is the only data received by the destination system.

<sup>4</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 Xacta.

<sup>4</sup> FIPS 199 is the [Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.



	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:  <b>Confidentiality:</b> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  <b>Integrity:</b> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  <b>Availability:</b> <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
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### PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<b>Component Privacy Office Reviewer:</b>	Jenny Hoots
<b>Date submitted to Component Privacy Office:</b>	April 7, 2016
<b>Date submitted to DHS Privacy Office:</b>	April 11, 2016
<b>Component Privacy Office Recommendation:</b>	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
<p>USCIS plans to launch the Feedback USA, the tool will allow customers to express their opinions when interacting in-person with USCIS field offices by visiting a small kiosk upon their exit. This tool will be available to USCIS customers for two months beginning in May 2016.</p> <p>The USCIS Office of Privacy recommendation is to designate this system as non-privacy sensitive. No further action is required.</p>	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Max Binstock</b>
<b>PCTS Workflow Number:</b>	<b>1122639</b>

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<b>Date approved by DHS Privacy Office:</b>	April 12, 2016
<b>PTA Expiration Date</b>	July 1, 2016

### DESIGNATION

<b>Privacy Sensitive System:</b>	No If "no" PTA adjudication is complete.
<b>Category of System:</b>	Form/Information Collection If "other" is selected, please describe: <a href="#">Click here to enter text.</a>
<b>Determination:</b>	<input checked="" type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your component Records Officer.
<b>PIA:</b>	Choose an item. If covered by existing PIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCIS is submitting this PTA because USA Feedback is a developmental system that is a simple tool to collecting customer feedback.</p> <p>USA Feedback is a non-privacy sensitive system since no PII is stored within the system boundary. As such, a PTA is sufficient at this time.</p>	