



## **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>	Form I-824, <i>Application for Action on an Approved Application or Petition</i> (OMB NO.1615-0044)		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office or Program:</b>	Service Center Operations (SCOPS)
<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>	Update
<b>Date first developed:</b>	N/A	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update</b>	September 30, 2013	<b>Pilot end date:</b>	September 30, 2015
<b>ATO Status (if applicable)</b>	N/A	<b>ATO expiration date (if applicable):</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Joe Dong		
<b>Office:</b>	SAFE	<b>Title:</b>	Adjudications Officer
<b>Phone:</b>	202-272-8168	<b>Email:</b>	Joe.dong@uscis.dhs.gov

### 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: Updated PTA

Form I-824, *Application for Action on an Approved Application or Petition* is set to expire on September 30, 2015. The purpose of the revised Form I-824 and the instructions is to add USCIS ELIS Account number fields for electronic filing to improve USCIS operations' efficiency in the current technology & system. In addition, Province, Postal Code, and Country fields were added under both physical & mailing address sections to allow customers to file the Form I-824 abroad.

This revised form is also being updated to clarify areas of the instructions, to make them easier to understand for the customer, and to incorporate standard language in the instructions/formatting required by OMB.

#### **Form I-824, Application for Action on an Approved Application or Petition**

Applicants use Form I-824, *Application for Action on an Approved Application or Petition*, to file an action for the approved underlying application or petition when the petitioner/applicant either changes his or her nonimmigrant or immigrant status or needs a new action by USCIS or Department of State (DOS), which is different form that originally requested. Applicants also use the form to request a duplicate approval notice from USCIS or the U.S. Customs and Border Protection (CBP) of a petition or application previously approved.

Form I-824 may be used in the following circumstances:

1. To request a duplicate approval notice;
2. USCIS to notify a new U.S. consulate through the DOS National Visa Center (NVC) or Kentucky Consular Center (KCC) concerning the approval of a nonimmigrant visa petition or to notify a new port of entry concerning the approval of a waiver application.
3. USCIS to notify a U.S. consulate through the DOS NVC that an individual's status has been adjusted to permanent resident based on an approved Form I-485 application;
4. USCIS to send an approved immigrant visa petition to the DOS NVC;
5. USCIS to notify the DOS that an individual has become a U.S. citizen through naturalization

CBP also collects and stores I-824 data to process requests for a duplicate approval notice. CBP's Admissibility Review Office records the I-824 information in the Automated Targeting System's Targeting Framework for case management purposes, as well as recording the issuance of an approved I-824 in TECS to facilitate inspections at the border. A copy of the approval is sent to USCIS to be stored in the A-File.

#### **Relevant Information Technology**

USCIS uses CLAIMS 3 to process Form I-817. The physical form and supplemental evidence is stored in the Alien File or Receipt File.

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

Closed Circuit Television (CCTV)



<p><i>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.</i></p>	<input type="checkbox"/> Social Media <input type="checkbox"/> Web portal <sup>1</sup> (e.g., SharePoint) <input type="checkbox"/> Contact Lists <input checked="" type="checkbox"/> None of these
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<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>	<input type="checkbox"/> This program does not collect any personally identifiable information <sup>2</sup> <input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> DHS employees/contractors (list components): <input type="checkbox"/> Contractors working on behalf of DHS <input type="checkbox"/> Employees of other federal agencies
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>
<p>Form I-824 is used to collect information about the petitioner/applicant of the underlying petition or application, who requests USCIS to take either an action or to notify U.S. Department of State about the petitioner/applicant’s new request of his or her immigrant benefit(s). USCIS and CBP also use the form to request a duplicate approval notice of a previously approved petition or application.</p> <p>Information collected about the petitioner/applicant include:</p> <ul style="list-style-type: none"> <li>• Full Name</li> <li>• Company or Organization Name</li> <li>• Alien Registration Number (A-Number , if applicable)</li> <li>• USCIS ELIS Account number</li> <li>• Social Security Number</li> </ul>

<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.

<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.



- Receipt Number
- IRS Tax Number, if applicable
- Physical and mailing Address
- Telephone Number(s)
- Email Address
- Date of Birth
- Country of Birth
- Current/Recent Immigration Status
- Certificate of Naturalization or Citizenship Number
- Date of Signature
- Signature

Information collected about the dependents includes:

- Full Name
- Date of Birth
- Country of Birth
- Country of Citizenship

Information collected about the representative and accredited representative includes:

- Attorney State License Number
- USCIS ELIS Account Number (if any)

Information collected about the form preparer includes:

- Full Name
- Business or Organization Name
- Mailing Address
- Phone Number
- Email Address
- Signature

Information collected about the interpreter includes:

- Full Name
- Business or Organization Name



## Privacy Threshold Analysis

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<ul style="list-style-type: none"> <li>• Mailing Address</li> <li>• Phone Number</li> <li>• Email Address</li> <li>• Signature</li> </ul>	
<p><b>4(a) Does the project, program, or system retrieve information by personal identifier?</b></p>	<p><input type="checkbox"/> No. Please continue to next question.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p> <ul style="list-style-type: none"> <li>• Alien Registration Number (A-Number , if applicable)</li> <li>• USCIS ELIS Account number</li> <li>• Receipt Number</li> <li>• Name and Date of Birth</li> </ul>
<p><b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" 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>INA 264(f) (8 U.S.C. 1304(f)) provides the Secretary of Homeland Security with the specific authority to collect SSNs of those applying for immigration benefits. USCIS collects the SSN to facilitate and expedite the adjudication of the applicant's request for a Form I-824 Application for Action on an Approved Application or Petition. The SSN information is used to establish and corroborate the applicant's identity.</p>
<p><b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>The SSN information collected within the Form I-824 application is also used to assist DHS in enforcing the immigration laws of the United States by providing timely and accurate information about persons who are subject to those laws. USCIS personnel conduct background security checks on applicants for the purpose of determining whether the applicant has established eligibility for the benefit requested. Because the I-824 is typically a non-interview, paper-based adjudication, the SSN is especially useful and provides significant information to verify an applicant's identity and his/her claim to eligibility: providing a critical tool for more accurate and appropriate adjudication</p>



	determinations for USCIS and the applicant.
<p><b>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b></p> <p><i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
<p><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></p>	
N/A	

<p><b>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems<sup>4</sup>?</b></p>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Form I-824 data is stored in USCIS CLAIMS 3. CBP stores I-824 data in the Automated Targeting System's Targeting Framework for case management purposes, and records the issuance of an approved I-824 in TECS to facilitate inspections at the border.
<p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b></p>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: USCIS will share the data on Form I-824 including all supporting documents with DOS. This is necessary because without sharing, DOS is unable to process the applicant's request and to issue a visa to the beneficiary of the I-824 if he or she is eligible for the visa benefit.
<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI,</b></p>	Existing DHS/USCIS-DOS/Bureau of Consular Affairs

<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.



etc.)?	MOU which allows DOS and DHS to exchange visa and immigration data.
<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"/> Not applicable. <input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <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. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:  Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined

### PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

<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.





<b>Component Privacy Office Reviewer:</b>	Jenny Hoots
<b>Date submitted to Component Privacy Office:</b>	February 5, 2015
<b>Date submitted to DHS Privacy Office:</b>	March 12, 2015
<b>Component Privacy Office Recommendation:</b>	
<i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
The USCIS Office of Privacy recommendation is to designate Form I-824 as privacy sensitive with coverage under the following privacy compliance documentation:	
<b>PIA</b>	
<ul style="list-style-type: none"> <li>• DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3), which covers the processing and adjudication of Form I-824.</li> <li>• DHS/CBP/PIA-006(b) - Automated Targeting System (ATS) Update, which covers which covers the collection and use of information for case management purposes.</li> <li>• DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing, which covers the collection and use of information to facilitate inspections at the border.</li> </ul>	
<b>SORN</b>	
<ul style="list-style-type: none"> <li>• DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records, which covers the collection, use, and maintenance of the physical application and supplemental documents.</li> <li>• DHS-USCIS-007 - Benefits Information System, which covers the collection, use, and storage of benefit applications.</li> <li>• DHS/USCIS-015 - Electronic Immigration System-2 Account and Case Management System of Records, which covers the collection, use, and storage of the ELIS Numbers.</li> <li>• DHS-CBP-006 - Automated Targeting System, which covers the collection and use of information for case management purposes.</li> <li>• DHS-CBP-011 - U.S. Customs and Border Protection TECS, which covers the collection and use of information to facilitate inspections at the border.</li> </ul>	
Please note that USCIS is updating the DHS-USCIS-007 Benefit Information System SORN to cover the collection, use, and maintenance of preparer and interpreter information.	

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

<b>DHS Privacy Office Reviewer:</b>	<b>Lindsay Lennon</b>
<b>PCTS Workflow Number:</b>	<b>1077571</b>



<b>Date approved by DHS Privacy Office:</b>	April 28, 2015
<b>PTA Expiration Date</b>	April 28, 2018

### DESIGNATION

<b>Privacy Sensitive System:</b>	Yes 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 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 checked="" type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" 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>	System covered by existing PIA If covered by existing PIA, please list: DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3), DHS/CBP/PIA-006(b) - Automated Targeting System (ATS) Update, and DHS/CBP/PIA-009 TECS System: CBP Primary and Secondary Processing
<b>SORN:</b>	System covered by existing SORN If covered by existing SORN, please list: DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 - Benefits Information System, DHS/USCIS-015 - Electronic Immigration System-2 Account and Case Management System of Records, DHS-CBP-006 - Automated Targeting System, and DHS/CBP-011 - U.S. Customs and Border Protection TECS
<b>DHS Privacy Office Comments:</b>	
<i>Please describe rationale for privacy compliance determination above.</i>	
The Form I-824 is used for previously approved applications and petitions. USCIS may send this form to CBP or DOS. USCIS is updating the Form I-824 to include ELIS number, and province, postal, and	



country codes.

PRIV agrees with USCIS Privacy that USCIS's collection, use, and maintenance of the form is covered by the CLAIMS 3 PIA and A-File, BIS, and ELIS SORNs. PRIV agrees with USCIS and CBP Privacy's recommendations that the ATS and TECS PIAs and ATS and TECS SORNs provide privacy compliance documentation coverage for the form.

The A-File SORN, routine use O, permits USCIS to share information with the Department of State in processing petitions and applications under the INA and other immigration laws.