



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, on DHSConnect and directly from the DHS Privacy Office via email: pia@hq.dhs.gov, phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Form N-300, <i>Application for Declaration of Intention</i>		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office or Program:	Field Operations Directorate
Xacta FISMA Name (if applicable):	Click here to enter text.	Xacta FISMA Number (if applicable):	N/A
Type of Project or Program:	Form or other Information Collection	Project or program status:	Modification
Date first developed:	Click here to enter a date.	Pilot launch date:	N/A
Date of last PTA update	June 10, 2009	Pilot end date:	N/A
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Ely P. Borjal		
Office:	Citizenship Branch, FOD	Title:	Adjudications Officer
Phone:	202 272 8679	Email:	Ely.p.borjal@uscis.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	N/A		
Phone:	N/A	Email:	N/A



SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: New PTA
<p>The Form N-300, <i>Application for Declaration of Intention</i> is used by permanent residents to file a Declaration of Intention to become a United States citizen.</p> <p>While USCIS does not require an individual to file this form to be eligible to become a U.S. Citizen, some states do. In some states, an individual must file the N-300 if they intend to do business with the state. For example, the state of Oregon requires lawful permanent residents (LPR) to have executed the intention to become a United States citizen in order to obtain a ‘concealed weapons permit’. While some states require the submission of this form to USCIS, USCIS is solely responsible for adjudicating the form.</p> <p>Upon receiving the N-300, USCIS issue a receipt notice to the individual notifying them that USCIS has received their Declaration of Intent to become a USCIS Citizen.</p> <p>The updated N-300, <i>Application for Declaration of Intention</i> has no substantive changes except the addition of interpreter, translator, acknowledgment of Application Support Center (ASC) appointment of applicant and preparer of the form.</p> <p>Relevant Information Technology</p> <p>There is no case management system for this form. A copy of the form N-300, <i>Application for Declaration of Intention</i> is maintained in the A-file.</p>

2. Does this system employ any of the following technologies:	
<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>	<input type="checkbox"/> Closed Circuit Television (CCTV) <input type="checkbox"/> Social Media <input type="checkbox"/> Web portal ¹ (e.g., SharePoint) <input type="checkbox"/> Contact Lists <input checked="" type="checkbox"/> None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information?	<input type="checkbox"/> This program does not collect any personally identifiable information ²
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¹ 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.

² 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



Privacy Threshold Analysis

Version number: 01-2014

Page 4 of 9

<i>Please check all that apply.</i>	<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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4. What specific information about individuals is collected, generated or retained?
<p>Information collected from the applicant:</p> <ul style="list-style-type: none">• First name• Middle name or initial• Last name• Date of birth• Mailing and physical addresses• Social security number• Legal permanent resident date• Country of birth• Nationality• Telephone numbers• Email address,• USCIS ELIS Account Number <p>Information collected from the interpreter:</p> <ul style="list-style-type: none">• First name• Middle name or initial• Last name• Address• Telephone numbers• Email address• The Attorney State Bar Number (if applicable)• The Attorney or Accredited Representative USCIS ELIS Account Number <p>Information collected from the Preparer:</p> <ul style="list-style-type: none">• First name

harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



<ul style="list-style-type: none"> • Last name • Business or organization name • Mailing address • Telephone number • Fax number • Email address 	
<p>4(a) Does the project, program, or system retrieve information by personal identifier?</p>	<input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Receipt numbers that references the applicants legal permanent resident number Full name, (alone and also combined with date of birth, country of birth, country of citizenship, etc.),A-number, Receipt Number, Social Security Number, Phone Number
<p>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</p>	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.
<p>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</p>	INA 334 and 8 CFR 334.11, to be use for proof of residency, physical presence evidence, and proof of legal permanent status.
<p>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	SSN can be matched with an income tax return filed yearly for earnings and proof of payment of taxes.
<p>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</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>4(f) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>N/A</p>	

³ 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.



<p>5. Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems⁴?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</p>	<p>N/A</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>
<p>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?</p>	<p><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:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined</p>

⁴ 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.

⁴ 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.



	Availability: <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)

Component Privacy Office Reviewer:	Catherine Catanzaro Shorten
Date submitted to Component Privacy Office:	August 20, 2015
Date submitted to DHS Privacy Office:	September 1, 2015
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
The USCIS Privacy Office recommendation is to designate Form N-300, <i>Application for Declaration of Intention</i> as a privacy sensitive program. While the N-300 is not processed in a case management system, like all A-file content, this form is subject to digitization. Therefore, we recommend coverage under the Integrated Digitization Document Management Program (IDDMP) PIA .	
Furthermore, we recommend coverage under the DHS/USCIS-001 – Alien File, Index, and National File Tracking System of Records June 13, 2011, (76 FR 34233) .	
USCIS is also drafting an updating Privacy Act Statement to add to the form.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Gina Mostafaie
PCTS Workflow Number:	1105128
Date approved by DHS Privacy Office:	October 16, 2015
PTA Expiration Date	October 16, 2018

DESIGNATION

Privacy Sensitive System:	Yes If “no” PTA adjudication is complete.
Category of System:	Form/Information Collection If “other” is selected, please describe: Click here to enter text.



Privacy Threshold Analysis

Version number: 01-2014

Page 8 of 9

Determination:	
<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 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.	
PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list:</p> <ul style="list-style-type: none"> -DHS/USCIS/PIA-003(a) - Integrated Digitization Document Management Program (IDDMP), September 24, 2013 -DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3)
SORN:	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list:</p> <ul style="list-style-type: none"> -DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864; -DHS/USCIS-007 - Benefits Information System September 29, 2008 73 FR 56596
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
<p>The Form N-300, Application for Declaration of Intention, is used by permanent residents to become a United States citizen. This form has been updated and now contains interpreter, translator, acknowledgement of Application Support Center (ASC) appointment of applicant and the form preparer. USCIS is only responsible for adjudicating the form.</p> <p>USCIS is submitting the Form N-300 because this form collects and maintains PII from the member of the public and therefore requiring PIA and SORN coverage. PRIV concurs that the Form N-300 requires language to include Privacy Act Statement since its collecting PII.</p> <p>This information is covered by following existing PIAs:</p> <ul style="list-style-type: none"> -DHS/USCIS/PIA-003(a) - Integrated Digitization Document Management Program (IDDMP), September 24, 2013; and -DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3). 	



Homeland Security

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U.S. Department of Homeland Security
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Privacy Threshold Analysis

Version number: 01-2014

Page 9 of 9

PRIV finds that the information collected is covered by the two SORNs listed below.

-DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864; and

-DHS/USCIS-007 - Benefits Information System September 29, 2008 73 FR 56596.