



## **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>	Ombudsman Customer Satisfaction and Needs Assessment Survey		
<b>Component:</b>	Management (MGMT)	<b>Office or Program:</b>	DHS HQ CISOMB
<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>	<b>Form or other Information Collection</b>	<b>Project or program status:</b>	<b>Development</b>
<b>Date first developed:</b>	March 1, 2015	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update</b>	March 1, 2015	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	Not started	<b>ATO expiration date (if applicable):</b>	N/A

### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Gary Merson		
<b>Office:</b>	DHS HQ CISOMB	<b>Title:</b>	Deputy Director
<b>Phone:</b>	202-357-8103	<b>Email:</b>	<a href="mailto:Gary.merson@hq.dhs.gov">Gary.merson@hq.dhs.gov</a>

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

<b>Name:</b>	Raymond Mills (ISSO Liaison for CISOMB with DHS HQ CIO)		
<b>Phone:</b>	202-731-5356	<b>Email:</b>	<a href="mailto:Raymond.g.mills@hq.dhs.gov">Raymond.g.mills@hq.dhs.gov</a>



## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: Choose an item.

*The Citizenship and Immigration Services (CIS) Ombudsman was created under section 452 of the Homeland Security Act of 2002 (Public Law 107-296) to: (1) assist individuals and employers in resolving problems with the U.S. Citizenship and Immigration Services (USCIS); (2) to identify areas in which individuals and employers have problems in dealing with USCIS; and (3) to the extent possible, propose changes in the administrative practices of USCIS to mitigate problems. This survey will be used by the general public to obtain feedback that will be used to assess the needs of customers to improve Ombudsman services.*

1. How will people receive the survey? Will they get an email?

The survey will be handed out at outreach events or be able to download the PDF online, fill it out and send it to us electronically as an email attachment or mail it in. An online fillable form will be developed in the future similar to the phased development approach that we used with the 7001. The distribution of surveys via email would not be an option if we are to maintain anonymity of respondents as that would mean we have an email address list that may contain PII.

2. How does CISOMB determine who will receive a survey?

The general public can participate in the survey on a voluntary basis.

3. Will user responses be anonymized? If so, how?

There is no provision for supplying or collecting identifying information when responding to or completing the survey and this will be clearly stated in the instructions for participants. Any PII will be redacted and/or destroyed upon receipt of a survey containing such information. These instructions will be provided to our survey intake data collectors.

### 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

<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.



	<input 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>	<p><input type="checkbox"/> This program does not collect any personally identifiable information<sup>2</sup></p> <p><input checked="" 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><i>The following narrative explains the survey:</i></p> <p><i>Office of the Citizenship &amp; Immigration Services Ombudsman</i> <i>Customer Satisfaction and Needs Assessment Survey</i></p> <p>1) <i>Have you used any of the Ombudsman’s services or interacted with the Ombudsman’s Office during the past year?</i></p> <p><i>o Yes o No o Aware/Don’t use o Unaware/Don’t use</i></p> <p>2) <i>If you have used the Ombudsman services, which have you used during the past year?</i></p> <p><i>o Made a request for case assistance</i></p> <p><i>o Asked for general information (other than case assistance)</i></p> <p><i>o Notified the Ombudsman of an issue or concern (other than case assistance)</i></p> <p><i>o Attended an Ombudsman teleconference or webinar</i></p> <p><i>o Attended a local community event with the Ombudsman</i></p> <p><i>o Attended the Ombudsman Annual Conference</i></p> <p><i>o Read an Ombudsman recommendation</i></p> <p><i>o Read the Ombudsman Annual Report to Congress</i></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.



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3) Do you use the Ombudsman's Online Case Assistance system to submit request(s) for assistance?  
 Yes  No  Aware/Don't use  Unaware/Don't use

4) If you did use the Ombudsman's Online Case Assistance, how would you rate the overall online experience?

Poor  Fair  Good  Very Good  Excellent

5) Was your issue with USCIS resolved after seeking assistance from the Ombudsman's Office?

Yes  No  Other (please explain)

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6) How would you rate the quality of the communications from the Ombudsman's Office?

Poor  Fair  Good  Very Good  Excellent

7) How do you rate the Ombudsman's website?

a. Ease of use:

Poor  Fair  Good  Very Good  Excellent

b. Content on the website is written in clear and simple language:

Poor  Fair  Good  Very Good  Excellent

c. I found what I was looking for quickly and easily.

Poor  Fair  Good  Very Good  Excellent

d. Overall website experience.

Poor  Fair  Good  Very Good  Excellent

8) How well do you speak English?

Not at all  Not well  Well  Very well

9) What other language do you speak besides English? Please select from the list below.

Arabic  Chinese  French  Korean

Japanese  German  Russian  Vietnamese

Spanish  Punjabi  Other (List) \_\_\_\_\_

10) What Ombudsman products would you like translated into other languages?

Recommendations to USCIS

Annual Report to Congress

Online Case Assistance website

Ombudsman DHS Form 7001 and Instructions

Ombudsman Teleconference transcripts



11) Overall how would you rate your experience seeking assistance from the Ombudsman?  
o Poor o Fair o Good o Very Good o Excellent

*CIS Ombudsman does intend to employ the use of statistics or the publication thereof for this collection of information.*

*CIS Ombudsman will display the expiration date for OMB approval of this information collection.*

*CIS Ombudsman does not request an exception to the certification of this information collection. Please complete this section if you are an attorney, a representative of an organization, an accredited representative, or anyone else preparing this form on behalf of the individual or employer encountering difficulties with USCIS. Please attach copy of your Form G-28*

12. Consent: Please note that if you are the beneficiary of an immigration petition, consent of the individual or employer that submitted the petition on your behalf is required. The petitioner must sign.

<b>4(a) Does the project, program, or system retrieve information by personal identifier?</b>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:
<b>4(b) Does the project, program, or system use Social Security Numbers (SSN)?</b>	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
<b>4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:</b>	Click here to enter text.
<b>4(d) If yes, please describe the uses of the SSNs within the project, program, or system:</b>	Click here to enter text.
<b>4(e) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b>  <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
<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>	

<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.



Click here to enter text.

<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>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:  DHS USCIS</p>
<p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?</b></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:  Click here to enter text.</p>
<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?</b></p>	<p>Choose an item.  Please describe applicable information sharing governance in place:</p>
<p><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></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. .</p>
<p><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></p>	<p><input checked="" 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><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input type="checkbox"/> Unknown.  <input checked="" type="checkbox"/> No.  <input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:  Confidentiality:</p>

<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"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Integrity: <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined  Availability: <input checked="" 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>	Click here to enter text.
<b>Date submitted to Component Privacy Office:</b>	Click here to enter a date.
<b>Date submitted to DHS Privacy Office:</b>	Click here to enter a date.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Click here to enter text.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	Lindsay Lennon
<b>PCTS Workflow Number:</b>	1068981
<b>Date approved by DHS Privacy Office:</b>	March 26, 2015
<b>PTA Expiration Date</b>	March 26, 2018

### DESIGNATION

<b>Privacy Sensitive System:</b>	No If "no" PTA adjudication is complete.
<b>Category of System:</b>	Choose an item. If "other" is selected, please describe: Click here to enter text.





<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>	
CISOMB will conduct a customer satisfaction survey. This survey will be handed out at outreach events and will be available to download and mail or email back to CISOMB. The survey will not solicit PII and any PII inadvertently collected will be redacted or destroyed upon receipt.	