Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
Version number: 01-2014
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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:

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.

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PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Form I-600, *Petition to Classify Orphan as an Immediate Relative* (OMB No. 1615-0028)		
Component:	U.S. Citizenship and Immigration Services (USCIS)	**Office or Program:**	Click here to enter text.
Xacta FISMA Name (if applicable):	N/A	**Xacta FISMA Number (if applicable):**	N/A
Type of Project or Program:	Form or other Information Collection	**Project or program status:**	Update
Date first developed:	August 9, 2012	**Pilot launch date:**	N/A
Date of last PTA update	**May 10, 2016**	**Pilot end date:**	N/A
ATO Status (if applicable)	N/A	**ATO expiration date (if applicable):**	N/A

PROJECT OR PROGRAM MANAGER

Name:	Kelley Miller
Office:	RAIO/International Operations Division
Phone:	(202) 272-0903

Office:	RAIO/International Operations Division	**Title:**	Acting Branch Chief
Phone:	(202) 272-0903	**Email:**	Kelley.Miller@uscis.dhs.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

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

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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

USCIS previously revised this form given the passage and signature of the Intercountry Universal Accreditation Act of 2012 (UAA). OMB approved these revisions and the new form went live on uscis.gov in February 2015. This form is currently up for extension with no changes requested.

Background on previous Form I-600 revisions:

On January 14, 2013, the President signed the Intercountry Adoption Universal Accreditation Act of 2012 (UAA), which will become effective July 14, 2014. As of that date, all agencies or persons proving adoption services in support of Form I-600A, Application for Advance Processing of an Orphan Petition or Form I-600, Petition to Classify Orphan as an Immediate Relative, must be accredited or approved, or be a supervised or exempted provider, in accordance with the Intercountry Adoption Act of 2000 and the Department of State accreditation regulations at 22 CFR 96 for Hague Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption (Hague Convention, Hague, or Convention) cases.

The UAA requires that adoption service providers (ASPs) handling non-Hague Convention adoption cases that fall under the Immigration and Nationality Act (INA) section 101(b)(1)(F) follow the same accreditation or approval process required of ASPs that handle Hague Convention cases under INA section 101(b)(1)(G). The UAA assures families pursuing an intercountry adoption that, regardless of the country from which they intend to adopt, the ASP they choose will need to comply with the same ethical standards of practice and conduct.

Effective July 14, 2014, cases that do not meet certain grandfathering criteria will be required to comply with the UAA requirements. Among them, the main requirement necessitating modifications to this Supplement is an ongoing duty of candor or disclosure, which is a result of OCC's determination that the UAA requires Hague-compliant home studies that satisfy 8 CFR 204.311.

Under 8 CFR Part 204.311(d), an applicant or petitioner, his/her spouse (if married), and any adult members of their household have a duty of candor in completing Form I-600A (if applicable), Form I-600, during the home study process, and an ongoing duty of disclosure throughout the adoption process to:

1. Provide true and complete information to the home study preparer;

2. Disclose other relevant information, such as physical, mental, or emotional health problems or behavioral issues;

3. Disclose any arrest, conviction, or other adverse criminal history, whether in the United States or abroad, even if the record of the arrest, conviction, or other adverse criminal history has been expunged, sealed, pardoned, or the subject of any other amelioration;

4. Disclose any history of substance abuse, sexual abuse or child abuse, and/or family violence as an offender under 8 CFR 204.309(a)(1); and

5. Notify the home study preparer and USCIS of any new event or information that might warrant submission of an amended or updated home study.

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Though a petitioner (and his or her spouse, if married) is currently required to sign and certify this form, given the UAA, we need to specifically ask the petitioner (and spouse, if married) questions related to items 3 and 4 and add in a petitioner (and spouse, if married) duty of disclosure certification box.

Form I-600, *Petition to Classify Orphan as an Immediate Relative*

This form is used by a U.S. citizen (and spouse, if married) who has or will adopt an orphan, who is not habitually resident in a Hague Adoption Convention Country. Form I-600 enables USCIS to determine whether the orphan is eligible to be classified as an immediate relative of the U.S. citizen (and spouse, if married).

This form may include Form I-600A/Form I-600, Supplement 1, *Listing of Adult Member of the Household*, to collect information on every adult member of the household age 18 and older who lives in the home of the prospective adoptive parent(s) except for the spouse of the applicant/petitioner.

IT SYSTEM

Domestic filings are received in at the USCIS lockbox; international filings are accepted by USCIS international offices (or the appropriate Embassy or Consulate if we do not have a presence in a country and the petitioner has a valid Form I-600A approval). The NBC uses NPWR/ACMS to track and process adoption cases filed domestically including Form I-600 petitions. IO uses CAMINO to track and process adoption cases filed at our international offices, including Form I-600 petitions.

The NBC uses NPWR/ACMS to track and process adoption cases filed domestically including Supp 1. IO uses CAMINO to track and process adoption cases filed abroad with USCIS, but currently does not record Form I-600A/Form I-600, Supp 1 filings.

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[1] (e.g., SharePoint) ☐ Contact Lists ☒ None of these

3. **From whom does the Project or Program collect, maintain, use, or disseminate information?**	☐ 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,

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Please check all that apply.	☒ Members of the public
	☐ DHS employees/contractors (list components):
	☐ Contractors working on behalf of DHS
	☐ Employees of other federal agencies

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4. What specific information about individuals is collected, generated or retained?

Form I-600 collects the following information:

- Petitioner:
    - Last name
    - First name
    - Middle name
    - Aliases, maiden name, nicknames (if any)
    - U.S. Mailing address, U.S. Physical address, and Address abroad (if any)
    - Date of birth
    - City, Town or Village of Birth
    - State or Province of Birth
    - Country of Birth
    - U.S. Citizenship status
    - Certificate of Citizenship or Certificate of Naturalization number
    - A-Number, if any
    - Marital status
    - Number of marriages
    - Criminal History
    - History of substance abuse, sexual abuse or child abuse, and/or family violence
    - Information on current spouse (if married):
        - Date and place of marriage

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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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- Spouse last name, first name, and middle name

- Aliases, maiden name, nicknames (if any)

- Date of birth

- A-Number, if any

- City, Town or Village of Birth

- State or Province of Birth

- Country of Birth

- Spouse's immigration status

- How many times spouse has been married

- Spouse's Physical address (if not residing with applicant)

- Duty of disclosure items

- History of substance abuse, sexual abuse or child abuse, and/or family violence

- Criminal History

- Statement, certification, USCIS ASC Acknowledgment, signature, and contact information (telephone & mobile number and email address)

- Duty of disclosure certification and signature

o Number of persons over 18 years old, other than the spouse) living in the petitioner's home

o Whether the petitioner (or spouse, if married) plans to personally see the child

o Whether the petitioner intends to adopt orphan in the U.S. (if applicable)

o Whether any preadoption requirements have been to be met (if applicable)

o Description of pre-adoption requirements (if applicable)

o Whether pre-adoption requirement will be met later (if applicable)

o Where petitioner will file visa application

o Duty of disclosure items

o Statement, certification, USCIS ASC Acknowledgment, signature, and contact information (telephone & mobile number and email address)

o Duty of disclosure certification and signature

- Beneficiary:

    o Last name

    o First name

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- Middle name
- Aliases, maiden name, nicknames (if any)
- Gender
- Date of birth
- City, Town or Village of Birth
- State or Province of Birth
- Country of Birth
- Beneficiary's orphan status
- Date of adoption (if any)
- Place of adoption (if any)
- Whether the orphan has a special need, disability, and/or impairment (if any)
- Description of the special need, disability, and/or impairment (if any)
- Who has legal custody of the child
- Address in U.S. where orphan will reside (if any)
- Present address of the orphan
- Name of institution where child resides (if any)
- Name and location of orphan's caretaker if not residing in institution

- Attorney Abroad (if any):
  - Last name
  - First name
  - Middle name
  - Address

- Home study preparer and/or adoption service provider:
  - Whether home was submitted with approved Form I-600A, was previously submitted with a pending Form I-600A, is attached to the Form I-600, or is not attached to the Form I-600
  - Name of Primary Adoption Service Provider
  - Point of contact
  - Mailing address
  - Telephone number
  - Fax number

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- o Email address
- o Whether the Primary Adoption Service Provider is an accredited agency or approved person
- o Whether there is a verification statement from the Primary Adoption Service Provider
- o Whether the Primary Adoption Service Provider provided a written report (if applicable)

- Accommodations for individuals with disabilities or impairments

- Interpreter name, organization, mailing address, telephone number, email address, certification, and signature

- Preparer name, organization, mailing address, telephone number, email address, fax number, certification, and signature

4(a) Does the project, program, or system retrieve information by personal identifier?	☐ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used: NBC stores information in petitioner's receipt files and may be retrieved by the receipt number associated with the file. IO stores information in CAMINO and may be retrieved by the petitioner name associated with the file.
4(b) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(c) If yes, please provide the specific legal basis and purpose for the collection of SSNs:	N/A
4(d) If yes, please describe the uses of the SSNs within the project, program, or system:	N/A
4(e) If this project, program, or system is an information 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 next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.
4(f) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	

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[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.

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Click here to enter text.

5.	**Does this project, program, or system connect, receive, or share PII with any other DHS programs or systems[4]?**	☐ No. ☒ Yes. If yes, please list: These forms are processed in CAMINO and NPWR/ACMS.
6.	**Does this project, program, or system connect, receive, or share PII with any external (non-DHS) partners or systems?**	☐ No. ☒ Yes. If yes, please list: Department of State, and occasionally Department of Health and Human Services.
	6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?	Existing Please describe applicable information sharing governance in place: A Memorandum of Understanding (MOU) exists between DHS and DOS that fully covers the sharing of information.
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?**	☐ No. ☒ Yes. If yes, please list: In addition to privacy training, USCIS provides adoption training throughout the year including use of NPRW/ACMS and/or CAMINO.
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?**	☒ Not applicable. ☐ No. What steps will be taken to develop and maintain the accounting: ☐ Yes. In what format is the accounting maintained:
9.	**Is there a FIPS 199 determination?[4]**	☐ Unknown.

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[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.

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	☒ No.
	☐ Yes. Please indicate the determinations for each of the following:
	Confidentiality:
	☐ Low ☐ Moderate ☐ High ☐ Undefined
	Integrity:
	☐ Low ☐ Moderate ☐ High ☐ Undefined
	Availability:
	☐ Low ☐ Moderate ☐ High ☐ 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:	May 10, 2016
Date submitted to DHS Privacy Office:	April 3, 2014
Component Privacy Office Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
The USCIS recommendation is to designate Form I-600 as a privacy sensitive form with coverage under the forthcoming International Adoptions Process PIA and DHS/USCIS/PIA-051 CAMINO PIA. Furthermore, USCIS Office of Privacy is in the process of updating the DHS/USCIS-005 - Inter-Country Adoptions Security June 5, 2007, 72 FR 31086. DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864, also provides coverage. USCIS also recommends adding a routine use in the Adoptions SORN to permit sharing of information to HHS.	

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1125381
Date approved by DHS Privacy Office:	June 9, 2016
PTA Expiration Date	June 9, 2017

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.
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required.

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	☐ DHS Policy for Computer-Readable Extracts Containing Sensitive PII applies.
	☐ Privacy Act Statement required.
	☒ Privacy Impact Assessment (PIA) required.
	☒ System of Records Notice (SORN) required.
	☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your component PRA Officer.
	☐ A Records Schedule may be required. Contact your component Records Officer.
PIA:	**New PIA is required.** If covered by existing PIA, please list: Forthcoming International Adoptions Process PIA; DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO)
SORN:	SORN update is required. If covered by existing SORN, please list: Update to DHS/USCIS-005 Inter-Country Adoptions Security; DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864

DHS Privacy Office Comments:
Please describe rationale for privacy compliance determination above.

USCIS is submitting this PTA because Form I-600 enables USCIS to determine whether the orphan is eligible to be classified as an immediate relative of the U.S. citizen (and spouse, if married).

PRIV finds that is a privacy sensitive system because Form I-600 collects PII from members of the public.

PRIV agrees with USCIS that PIA coverage will be provided by the Forthcoming International Adoptions (ACMS) PIA and CAMINO PIA.

ACMS collects and maintains information on U.S. citizen prospective adoptive parents, spouses, adult members of the household, adoptive beneficiaries, adoption service providers, home study preparers, attorneys, and form preparers to determine the prospective adoptive parents' suitability and eligibility to adopt and the child's eligibility to immigrate to the United States as an immediate relative.

CAMINO maintains information from applications for immigration benefits adjudicated or processed by USCIS IO offices located both overseas and domestically.

PRIV agrees that DHS/USCIS-005 SORN covers the collection of some of the data elements that I-600 captures; however, additional elements i.e. gender, reason for orphan status, orphan custodian information, physical and mental affliction, and form preparer information should be added to the SORN update to adequately cover the elements that USCIS will collect using Form 1-600. Additionally, this

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program contemplates sharing information with HHS. PRIV agrees with USCIS that the DHS/USCIS-005 update should include adding a routine use to permit sharing of information to HHS.

PRIV agrees that Form I-600 will be covered by the DHS/USCIS/ICE/CBP-001 SORN, because information collected is maintained in A-File and it documents the applicant's benefits as they pass through the immigration process.