



## PRIVACY THRESHOLD ANALYSIS (PTA)

**This form serves as the official determination by the DHS Privacy Office to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).**

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals as determined by the Chief Privacy Officer, pursuant to Section 222 of the Homeland Security Act, and to assess whether there is a need for additional Privacy Compliance Documentation. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used and managed.

Please complete the attached Privacy Threshold Analysis and submit it to your component Privacy Office. After review by your component Privacy Officer the PTA is sent to the Department's Senior Director for Privacy Compliance for action. 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](mailto:PIA@hq.dhs.gov)

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement, or Computer Matching Agreement (CMA) – the DHS Privacy Office or component Privacy Office will send you a copy of the relevant compliance template to complete and return.



## Privacy Threshold Analysis (PTA)

### *Specialized Template for Information Collections (IC) and Forms*

The Forms-PTA is a specialized template for Information Collections and Forms. This specialized PTA must accompany all Information Collections submitted as part of the Paperwork Reduction Act process (any instrument for collection (form, survey, questionnaire, etc.) from ten or more members of the public). Components may use this PTA to assess internal, component-specific forms as well.

<b>Form Number:</b>	<b>Form I-730</b>	
<b>Form Title:</b>	<b>Refugee/Asylee Relative Petition</b>	
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office: RAIO and SCOPS

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

<b>Collection Title:</b>	<b>Click here to enter text.</b>		
OMB Control Number:	Click here to enter text.	OMB Expiration Date:	Click here to enter a date.
Collection status:	Choose an item.	Date of last PTA (if applicable):	Click here to enter a date.

#### PROJECT OR PROGRAM MANAGER

Name:	William Tomlyanovich and Roman Ginzburg		
Office:	SCOPS/ANTZ, RAIO/IO	Title:	Adjudications Officer
Phone:	202-272-1384, 202-272-8605	Email:	<a href="mailto:William.J.Tomlyanovich@uscis.dhs.gov">William.J.Tomlyanovich@uscis.dhs.gov</a> , <a href="mailto:Roman.Ginzburg@uscis.dhs.gov">Roman.Ginzburg@uscis.dhs.gov</a>



## COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	William Tomlyanovich and Roman Ginzburg		
Office:	SCOPS/ANTZ, RAIO/IO	Title:	Adjudications Officer
Phone:	202-272-1384, 202-272-8605	Email:	<a href="mailto:William.J.Tomlyanovich@uscis.dhs.gov">William.J.Tomlyanovich@uscis.dhs.gov</a> , <a href="mailto:Roman.Ginzburg@uscis.dhs.gov">Roman.Ginzburg@uscis.dhs.gov</a>

## SPECIFIC IC/Forms PTA QUESTIONS

### 1. Purpose of the Information Collection or Form

a. Describe the purpose of the information collection or form.

USCIS is extending/renewing Form I-730, Refugee/Asylee Relative petition. The form allows Principal Refugees and Asylees to petition for their spouse and children. If the petitioner has been admitted to the United States as a principal refugee or if he/she was granted status in the United States as a principle asylee within the previous two years, the petitioner may file a Form I-730 to request follow-to-join benefits for his/her spouse and/or unmarried children under 21 years of age only. See [Form I-730 instructions](#) for further information.

b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

The authority to collect information in this form is set forth in the Immigration and Nationality Act, 8 U.S.C. §§ 1103, 1158, 1225, 1228, and Title II of Public Law 105-100 and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).

### 2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	--

<sup>1</sup> Personally identifiable information means any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.



<p>b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> Members of the public</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</li> <li><input checked="" type="checkbox"/> Non-U.S. Persons.</li> </ul> <p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input type="checkbox"/> Other federal employees or contractors.</p> <p>Some petitioners are lawful permanent residents (LPRs) and some are refugees or asylees. Beneficiaries are non-US persons.</p>
<p>c. Who will complete and submit this form? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant).</p> <p><input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.).</p> <p><input type="checkbox"/> Business entity.</p> <p style="padding-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="padding-left: 80px;"><input type="checkbox"/> Yes</p> <p style="padding-left: 80px;"><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i></p> <p>The petitioner or the petitioner’s legal representative will fill out the form.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p>



	This form is not currently in ELIS. The electronic version can be found here: <a href="https://www.uscis.gov/i-730">https://www.uscis.gov/i-730</a>
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>	
<p>The form is filled out by the petitioner, beneficiary or by the petitioner’s representative.</p> <p><b>Petitioner and Beneficiary</b> Form I-730 will continue to collect the following information from the petitioner and beneficiary to determine benefit eligibility: full name, alias, mailing address, telephone number, email, gender, date and country of birth, Alien Number, Social Security Number (if applicable), status, nationality, citizenship, relationship between the petitioner and beneficiary, marital status, date of marriage, date of divorce, former spouse name, date of asylum grant or refugee admission, date of arrival in USA, I-94, Passport Number, Travel Document Number, Country of Issuance for Passport or Travel Document and Expiration Date for Passport or Travel Document, and native language.</p> <p>The form instructions also instruct the petitioner to submit verifying evidence to show that the petitioner is eligible to file Form I-730, e.g. evidence of status as refugee or asylee, and that a familial relationship exists between the petitioner and alien relative at the time the petitioner were admitted as a refugee or granted asylum in the United States, e.g., beneficiary’s birth or marriage certificate.</p> <p>USCIS uses this information and collected biometrics (beneficiary’s fingerprints and photo) to conduct enhanced security checks, interview beneficiaries and verify the authenticity of their original documents or collect additional documentary evidence to verify identity and qualifying relationship, as well as probe criminal, terrorist, persecutor and national security-related ineligibility grounds.</p> <p><b>Petitioner Representative</b> As part of standard language updates, Form I-730 will now include a signature section for the interpreter and preparer. These sections collect the interpreter’s and preparer’s contact information such as daytime telephone number and firm name, address, and email address (if any), certification, and signature.</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply.</i></p>	
<p><input checked="" type="checkbox"/> Social Security number <input checked="" type="checkbox"/> Alien Number (A-Number)</p>	<p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</p>



<input type="checkbox"/> Tax Identification Number	<input type="checkbox"/> Social Media Handle/ID
<input type="checkbox"/> Visa Number	<input type="checkbox"/> Known Traveler Number
<input type="checkbox"/> Passport Number	<input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)
<input type="checkbox"/> Bank Account, Credit Card, or other financial account number	<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Other. <i>Please list:</i>	<input checked="" type="checkbox"/> Biometrics

**g. List the *specific authority* to collect SSN or these other SPII elements.**

The authority to collect information in this form is set forth in the Immigration and Nationality Act, 8 U.S.C. §§ 1103, 1158, 1225, 1228, and Title II of Public Law 105-100 and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).

The SSN information collected within the Form I-730 application is used to assist the DHS in enforcing the immigration laws of the United States by providing timely and accurate information about persons who are subject to those laws.

**h. How will this information be used? What is the purpose of the collection? Describe *why* this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.**

Under the current process, the Nebraska and Texas Service Centers adjudicate the I-730 petition for overseas beneficiaries without the benefit of an interview and beneficiary biometric and enhanced security checks. Service Centers send approved petitions, via the National Visa Center (NVC), to a Refugee, Asylum and International Operations (RAIO) field office or Department of State (DOS) consular post for travel document processing. Prior to issuing travel documents, RAIO or DOS officers (overseas officers) collect biometrics and conduct enhanced security checks, interview beneficiaries and verify the authenticity of their original documents or collect additional documentary evidence to verify identity and qualifying relationship, as well as probe criminal, terrorist, persecutor and national security-related ineligibility grounds.

<p><b>i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?</b></p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. There is a Privacy Act Statement on the form.</p> <p><input type="checkbox"/> No.</p>
---	---



3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input checked="" type="checkbox"/> Paper. Please describe. A-files <input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.
b. If electronic, how does DHS input the responses into the IT system?	<input type="checkbox"/> Manually (data elements manually entered). Please describe. Click here to enter text. <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<input checked="" type="checkbox"/> By a unique identifier. <sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. A-number <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	SCOPS/RAIO defers to the Records Officer. The I-730 form is A-File material, meaning it should be placed into the Alien File and retained in accordance with the <a href="#">A-File retention schedule</a> . <div style="border: 1px solid black; padding: 2px; display: inline-block;">NC1-85-80-5/1</div>
e. How do you ensure that records are disposed of or deleted	Program office following the records retention schedule for filing and destruction of records.

<sup>2</sup> Generally, a unique identifier is considered any type of “personally identifiable information,” meaning any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which 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.





in accordance with the retention schedule?	
<p>f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i></p> <p>Service Centers send approved petitions, via the National Visa Center (NVC), to a Refugee, Asylum and International Operations (RAIO) field office <u>or Department of State (DOS) consular post for travel document processing</u>. DOS consular officers interview some beneficiaries to verify eligibility for travel.</p> <p>The authority to collect information in this form is set forth in the Immigration and Nationality Act, 8 U.S.C. §§ 1103, 1158, 1225, 1228, and Title II of Public Law 105-100 and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).</p> <p><input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Information from Form I-730 is entered into CLAIMS 3 for adjudication and the supplemental documents are stored in the A-File. International Field Offices will also update CAMINO with case information and an adjudicative decision for transferred cases. Once a case has been adjudicated, IO will update data from CAMINO into CLAIMS 3 servers to update the CLAIMS 3 petition records.</p> <p><input checked="" type="checkbox"/> Yes, information is shared <i>external</i> to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.</p> <p>Please describe applicable information sharing governance in place: MOA between DOS and DHS regarding the sharing of VISA and passport records and immigration and naturalization and citizenship records.</p> <p>Routine Use of the BIS SORN, which permits the sharing of information with DOS for the purpose of assisting in the processing of petitions or applications for benefits.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	







**Homeland  
Security**

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

**Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.**



## PRIVACY THRESHOLD REVIEW

**(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)**

Component Privacy Office Reviewer:	<b>Kim Mott</b>
Date submitted to component Privacy Office:	<b>January 13, 2017</b>
Date submitted to DHS Privacy Office:	January 24, 2017
Have you approved a Privacy Act Statement for this form? <i>(Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)</i>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. <a href="#">Click here to enter text.</a> USCIS Office of Privacy developed a Privacy Act Statement and is seeking program and OCC approval.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
USCIS is extending/renewing Form I-730, Refugee/Asylee Relative petition. The form allows Principal Refugees and Asylees to petition for their spouse and children. If the petitioner has been admitted to the United States as a principal refugee or if he/she was granted status in the United States as a principle asylee within the previous two years, the petitioner may file a Form I-730 to request follow-to-join benefits for his/her spouse and/or unmarried children under 21 years of age only.	
The Office of Privacy recommends this form is privacy sensitive with coverage under existing PIAs and SORNs.	
<b>PIA</b> <ul style="list-style-type: none"> <li>DHS/USCIS/PIA-16(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated System since information is entered into CLAIMS 3 and listed in the PIA.</li> <li>DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO) which is used to support Refugee, Asylum and International Operations (RAIO) International Operations (IO). It's a case management system designed to</li> </ul>	



facilitate the processing of immigrant applications and petitions received or adjudicated by RAIO IO.

## SORN

- DHS/USCIS/ICE/CBP-001 Alien File, Index and National File Tracking System of Records, November 22, 2013, 78 FR 69864 since the information is stored in the A file.
- DHS/USCIS-007 Benefits Information System, October 19, 2016, 81 FR 72069 USCIS' collection, use, maintenance, dissemination, and storage of paper and electronic benefit request information. These records assist in the processing of immigrant and nonimmigrant benefit requests from the time when USCIS collects the information from the benefit requestor until the case reaches a final decision in the relevant case management system.
- DHS/USCIS-010 Asylum Information and Pre-screening System of Records, November 30, 2015, 80 FR 74781 since the purpose of this SORN is to manage, control, and track follow-to-join derivative asylum/refugee cases (Form I-730) under 8 CFR 208.21.



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Max Binstock</b>
PCTS Workflow Number:	<b>1137733</b>
Date approved by DHS Privacy Office:	January 31, 2017
PTA Expiration Date	January 31, 2020

### DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If "no" PTA adjudication is complete.</b>
Determination:	<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 SPII 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"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
DHS IC/Forms Review:	DHS PRIV has not received this ICR/Form.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	<b>New e(3) statement is required.</b> Click here to enter text.
PTA:	<b>New system PTA required.</b> Click here to enter text.
PIA:	<b>System covered by existing PIA</b> If covered by existing PIA, please list: DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO);



	DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems If a PIA update is required, please list: Click here to enter text.
SORN:	<b>SORN update is required.</b> If covered by existing SORN, please list: DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, November 21, 2013, 78 FR 69864; DHS/USCIS-010 Asylum Information and Pre-Screening System of Records, November 30, 2015, 80 FR 74781 If a SORN update is required, please list:
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p><b>USCIS Privacy is submitting this PTA because Form I-730, Refugee/Asylee Relative petition allows Principal Refugees and Asylees to petition for their spouse and children. If the petitioner has been admitted to the United States as a principal refugee or if he/she was granted status in the United States as a principle asylee within the previous two years, the petitioner may file a Form I-730 to request follow-to-join benefits for his/her spouse and/or unmarried children under 21 years of age only.</b></p> <p><b>PRIV finds that is a privacy sensitive system and a PIA is required because From I-730 collects PII from members of the public. PRIV agrees with USCIS Privacy that the CAMINO PIA and CLAIMS 3 PIA provides coverage. DHS/USCIS/PIA-051 discusses the case management system designed to facilitate the processing of immigrant applications and petitions received or adjudicated by RAIO IO. DHS/USCIS/PIA-016(a) discusses the processing of the form in CLAIMS 3.</b></p> <p><b>PRIV finds that a SORN is required because Form I-730 retrieves information by a unique identifier. PRIV agrees with USCIS Privacy that the A-File, Index, and National File Tracking SORN and Asylum Information and Pre-screening SORN provide coverage. DHS/USCIS/ICE/CBP-001 covers information stored in the A-File. DHS/USCIS-010 covers records collected in follow-to-join derivative asylum/refugee cases (Form I-730) under 8 CFR 208.21.</b></p> <p><b>PRIV also finds that a PAS is required because Form I-730 asks persons to provide personal information about themselves, which will go into a system of records.</b></p>	