



## 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.

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**Form Number:** N-565

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**Form Title:** Application for Replacement Naturalization Citizenship Document

Component: U.S. Citizenship and Immigration Services (USCIS)      Office: Field Operations Division

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

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**Collection Title:** N-565, *Application for Replacement Naturalization Citizenship Document*

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OMB Control Number: 1615-0091      OMB Expiration Date: May 31, 2017

Collection status: Extension      Date of last PTA (if applicable): February 3, 2010

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#### PROJECT OR PROGRAM MANAGER

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Name: James Weidemann

Office: Baltimore District Office      Title: Adjudication Officer

Phone: 202-740-1426      Email: James.a.weidemann@uscis.dhs.gov

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#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

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Name: Kerstin A. Jager

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Office:	Regulatory Coordination Division	Title:	Adjudication Officer
Phone:	202-213-4211	Email:	Kerstin.a.jager@uscis.dhs.gov

## SPECIFIC IC/Forms PTA QUESTIONS

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

a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*

*If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.*

USCIS is submitting an extension for the Form N-565 PTA with no substantial changes.

#### **N-565. Application for Replacement Naturalization Citizenship Document**

Section 343(a) of the Immigration and Nationality Act (INA) provides that if any certificate of naturalization or citizenship issued to any citizen or any declaration of intention furnished to any declarant is lost, mutilated, or destroyed, the citizen or declarant may make application to the Secretary of Homeland Security for a new certificate or declaration.

Form N-565 is used to apply to U.S. Citizenship and Immigration Services (USCIS) for a replacement of one of the following:

1. Certificate of Naturalization;
2. Certificate of Citizenship;
3. Declaration of Intention;
4. Repatriation Certificate; or
5. To apply for a special certificate of naturalization to be recognized as a U.S. citizen by a foreign country.

The form is provided by USCIS to determine the applicant's eligibility for a replacement document. An applicant may file for a replacement if he or she was issued one of the documents described above and it was lost, mutilated, or destroyed, or if the applicant's name was changed by a marriage or by court order after the document was issued and now seeks a document in the new name. If the applicant is a naturalized citizen who



desires to obtain recognition as a citizen of the United States by a foreign country, he or she may apply for a special certificate for that purpose.

### **Relevant IT System**

Data from Form N-565 is stored in CLAIMS3. Some N-565 data is currently stored in the USCIS Electronic Immigration System (USCIS ELIS); USCIS is moving incrementally toward data from all newly filed N-565's being stored in USCIS ELIS. USCIS anticipates that USCIS ELIS will become the primary system for storing data from newly filed N-565s starting in FY 17 Q4.

Form N-565 and its supplemental evidence is stored in the applicant's A-file.

- 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.*

INA Sec. 343. [8 U.S.C. 1454]

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
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> Members of the public <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> <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input type="checkbox"/> Business entity.

<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>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> Click here to enter text.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i></p>
<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><b>From the Applicant, this form collects:</b></p> <ul style="list-style-type: none"> <li>• Full Legal Name</li> <li>• Alias(es)</li> <li>• Gender</li> <li>• Height</li> <li>• Marital Status</li> <li>• Date of Birth</li> <li>• Country of Birth</li> <li>• Certificate Number</li> <li>• Alien Registration Number (A-Number)</li> <li>• Mailing Address</li> <li>• Telephone Numbers</li> <li>• Email Address</li> <li>• Signature</li> </ul> <p><b>This form collects the following processing information:</b></p>	



- Basis for application
- USCIS Office of Name Of Court that issued last certificate
- Date Last Certificate was issued

**From an Interpreter, this form collects:**

- First and Last Name
- Business or Organization Name
- Mailing Address
- Telephone Numbers
- Email Address
- Signature

**From a Preparer, this form collects:**

- First and Last Name
- Business or Organization Name
- Mailing Address
- Telephone Numbers
- Email Address
- Signature

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? *Check all that apply.*

- |  |  |
|--|--|
| <input type="checkbox"/> Social Security number              | <input type="checkbox"/> DHS Electronic Data Interchange |
| <input checked="" type="checkbox"/> Alien Number (A-Number)  | Personal Identifier (EDIPI)                              |
| <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 |
| <input type="checkbox"/> Bank Account, Credit Card, or other | Entry, Pre-Check, etc.)                                  |
| financial account number                                     | <input type="checkbox"/> Driver's License Number         |
| <input type="checkbox"/> Other. <i>Please list:</i>          | <input type="checkbox"/> Biometrics                      |

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

**INA Sec. 343. [8 U.S.C. 1454]**



<p>h. How will this information be used? What is the purpose of the collection? Describe <b>why</b> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.</p>	
<p>Alien numbers, also called alien registration numbers, or A-numbers are identification numbers issued to noncitizens by USCIS. The information collected in association with the Alien Number is for tracking and record keeping purposes. The purpose of this will allow internal employees the ability to track and work the application. This collection is needed due to the sheer number of N-565s that are received and ingested into USCIS systems.</p>	
<p>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>)?</p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. The accompanying instructions for Form I-565 includes a Privacy Act Statement notifying the individual of the authority, purpose, routine uses, and disclosure of information Please note that the N-565 can also be filled out by a third party agency, after a properly executed G-28 is filed.</p> <p><input type="checkbox"/> No.</p>

3. How will DHS store the IC/form responses?	
<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input checked="" type="checkbox"/> Paper. Please describe. Form N-565 is stored in the applicant's A-file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Data from Form N-565 is stored in CLAIMS3. Some N-565 data is currently stored in the USCIS Electronic Immigration System (ELIS); USCIS is moving incrementally toward data from all newly filed N-565's being stored in ELIS. USCIS anticipates that ELIS will become the primary system for storing data from newly filed N-565s starting in FY 17 Q4.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p>



	<p>When Form N-565 is ingested at Lockbox, USCIS will store a scanned version of the N-565 in the Enterprise Data Management System (EDMS).</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe.        USCIS manually inputs N-565 data into CLAIMS3 when the form is filed with a Service Center.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.        As USCIS moves toward storing new N-565 data in ELIS, these forms will be ingested at the Lockbox instead of a Service Center, and the data will be sent automatically from Lockbox into ELIS. USCIS anticipates that the form will start being ingested at the Lockbox in FY 17 Q4.</p>
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><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.        Alien Registration Number (A-Number), Receipt Number, and/or Name and Date of Birth are the unique identifiers used to retrieve information from CLAIMS3 and ELIS.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i>        Click here to enter text.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p><b>Form N-565:</b> DAA-0566-2016-0016, Citizenship and Naturalization Forms; published 9/9/2016</p> <p><b>CLAIMS 3:</b> DAA-0566-2016-0009</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with</p>	<p>Local Records follows the Records Policy Manual (RPM) as well as retention schedules as required and set forth by Immigration Records and Identity Management (IRIS) Directorate.</p>

<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.





the retention schedule?	
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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. <a href="#">Click here to enter text.</a>  <input 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. <a href="#">Click here to enter text.</a>  <input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office.	



**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:	Jenny Hoots
Date submitted to component Privacy Office:	March 23, 2017
Date submitted to DHS Privacy Office:	May 1, 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 checked="" type="checkbox"/> Yes. Please include it with this PTA submission. <input type="checkbox"/> No. Please describe why not. <a href="#">Click here to enter text.</a>
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
The USCIS Office of Privacy recommendation is to designate Form N-565 as a privacy sensitive form with coverage under the following:	
<p><b><u>PIAs</u></b></p> <ul style="list-style-type: none"> <li>DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program, which covers the digitization and storage of forms in the Enterprise Document Management System</li> <li>DHS/USCIS/PDHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, which covers the processing and adjudication of Form N-565</li> <li>DHS/USCIS/PIA-056 USCIS ELIS which covers the processing and adjudication of electronically filed Form N-565</li> </ul> <p><b><u>SORN</u></b></p> <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 storage of the Form N-565 and supplemental documents in the A-File</li> </ul>	



- DHS/USCIS-007 Benefits Information System, which covers the collection, use and storage of data elements USCIS collects from benefit requestors, preparers, and interpreters



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Max Binstock</b>
PCTS Workflow Number:	<b>1142772</b>
Date approved by DHS Privacy Office:	May 2, 2017
PTA Expiration Date	May 2, 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-003(a) Integrated Digitization Document Management Program (IDDMP);



	DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems; DHS/USCIS/PIA-056 USCIS ELIS If a PIA update is required, please list: <a href="#">Click here to enter text.</a>
SORN:	<b>System covered by existing SORN</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-007 Benefits Information System October 19, 2016, 81 FR 72069 If a SORN update is required, please list: <a href="#">Click here to enter text.</a>
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<b>USCIS Privacy is submitting this PTA because Form N-565 is provided by USCIS to determine the applicant’s eligibility for a replacement document. Form N-565 is used to apply to U.S. Citizenship and Immigration Services (USCIS) for a replacement of one of the following: Certificate of Naturalization; Certificate of Citizenship; Declaration of Intention; Repatriation Certificate; or To apply for a special certificate of naturalization to be recognized as a U.S. citizen by a foreign country.</b>	
<b>PRIV finds that is a privacy sensitive system and a PIA is required because Form N-565 collects PII from members of the public. PRIV concurs with USCIS Privacy that the CLAIMS 3, IDDMP, and USCIS ELIS PIAs provide coverage for the recommended reasons above.</b>	
<b>PRIV finds that a SORN is required because Form N-565 retrieves information by a unique identifier. PRIV agrees with USCIS Privacy that the BIS and A-File SORNs provide coverage. DHS/USCIS/ICE/CBP-001 covers the collection, use, and storage of the Form N-565 and supplemental documents in the A-File. DHS/USCIS-007 covers the collection, use and storage of data elements USCIS collects from benefit requestors, preparers, and interpreters.</b>	
<b>PRIV finds that a PAS is required because Form N-565 collects information from persons asked to provide personal information about themselves, which will go into a system of records.</b>	