



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

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.

| | | | |
|---------------------|---|---------|--|
| Form Number: | G-325A | | |
| Form Title: | Biographic Information | | |
| Component: | U.S. Citizenship and Immigration Services (USCIS) | Office: | Office of Policy & Strategy |

IF COVERED BY THE PAPERWORK REDUCTION ACT:

| | | | |
|--------------------------|---------------------------------------|-----------------------------------|----------------------|
| Collection Title: | G-325A, Biographic Information | | |
| OMB Control Number: | 1615-0008 | OMB Expiration Date: | June 30, 2017 |
| Collection status: | Revision | Date of last PTA (if applicable): | April 6, 2011 |

PROJECT OR PROGRAM MANAGER

| | | | |
|---------|------------------------------|--------|-----------------------------------|
| Name: | Frederick Dimichele | | |
| Office: | Field Operations Directorate | Title: | Adjudications Officer |
| Phone: | 202-766-0744 | Email: | Frederick.Dimichele@uscis.dhs.gov |

COMPONENT INFORMATION COLLECTION/FORMS CONTACT



| | | | |
|---------|------------------------------|--------|-----------------------------------|
| Name: | Frederick Dimichele | | |
| Office: | Field Operations Directorate | Title: | Adjudications Officer |
| Phone: | 202-766-0744 | Email: | Frederick.Dimichele@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.

Form G-325A is used to collect biographical information in conjunction with certain USCIS applications or requests. This updated PTA adds the G-325A’s collection in conjunction with requests for deferred action submitted by certain family members of active-duty or Selected Reserve of the Ready Reserve military members, veterans, and enlistees as well as certain enlistees themselves. A separate PTA is being completed for this information.

USCIS provides deferred action as an exercise of agency discretion to defer the removal action against certain individuals who are unlawfully present in the United States. Foreign nationals in the United States may request deferred action by submitting a letter to USCIS with evidence relevant to their situations. When determining whether to grant deferred action, USCIS makes a case-by-case discretionary judgment based on the totality of the evidence. USCIS considers certain factors particularly relevant to the exercise of discretion, including but not limited to: The fact that the individual requesting deferred action is a U.S. Department of Defense (DoD) Delayed Entry Program (DEP) enlistee or the spouse, parent, son, or daughter of a DEP enlistee; or the fact that the individual would be eligible for parole in placed under separate guidelines but for the fact that such individual has already been admitted. The existence of one or more of the above factors does not guarantee a grant of deferred action but may be considered a strong positive factor when assessing the totality of the facts of the individual request.

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.*

Section 103 of the Immigration and Nationality Act (INA), 8 U.S.C 1103 (a) (1), gives the Secretary of Homeland Security (the Secretary) general authority to enforce and administer the immigration laws. On November 15, 2013, pursuant to the authority conferred upon the Secretary of Homeland Security by INA § 212(d)(5)(A), 8 U.S.C. §



1182(d)(5)(A), U.S. Citizenship and Immigration Services (USCIS) issued a Policy Memorandum (PM) guiding the exercise of discretion with respect to applications for parole by designated family members of certain U.S. military personnel and veterans. On November 20, 2014, the Secretary directed USCIS to expand on these policies, including by issuing new policies on the use of both parole and deferred action for certain family members of military personnel, veterans, and Department of Defense (DOD) Delayed Entry Program (DEP) enlistees. In accordance with the Secretary’s direction, USCIS issued a subsequent PM on November 23, 2016, under the authority provided by INA § 103(a)(3), 8 U.S.C. 1103(a)(3), to provide the guidance necessary to carry out the authority provided in 8 U.S.C. 1103(a)(1). PM: https://www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/2016/PIP-DA_Military_Final_112316.pdf

| 2. Describe the IC/Form | |
|---|---|
| a. Does this form collect any Personally Identifiable Information” (PII ¹)? | <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 <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons. <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. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input type="checkbox"/> No |

¹ 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.



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|---|--|--|--|---|---|--|--|--------------------------------------|--|--|--|
| | <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text. | | | | | | | | | | |
| <p>d. How do individuals complete the form? <i>Check all that apply.</i></p> | <input checked="" type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> | | | | | | | | | | |
| <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> | | | | | | | | | | | |
| <ul style="list-style-type: none"> • Full name • Aliases • Sex • Date of birth • Citizenship/nationality • City and country of birth • Social Security Number, if applicable • Parents' names, dates of birth, city/country of birth, and city and country of residence • Current and former spouses' names, dates of birth, dates and places of marriage/termination • Last 5 years of residence including last address outside the U.S. of more than 1 year • Last 5 years of employment including last occupation abroad | | | | | | | | | | | |
| <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> | | | | | | | | | | | |
| <table border="0" style="width: 100%;"> <tr> <td><input checked="" type="checkbox"/> Social Security number</td> <td><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Alien Number (A-Number)</td> <td><input type="checkbox"/> Social Media Handle/ID</td> </tr> <tr> <td><input type="checkbox"/> Tax Identification Number</td> <td><input type="checkbox"/> Known Traveler Number</td> </tr> <tr> <td><input type="checkbox"/> Visa Number</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Passport Number</td> <td></td> </tr> </table> | | <input checked="" type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) | <input checked="" type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID | <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number | <input type="checkbox"/> Visa Number | | <input type="checkbox"/> Passport Number | |
| <input checked="" type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) | | | | | | | | | | |
| <input checked="" type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID | | | | | | | | | | |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number | | | | | | | | | | |
| <input type="checkbox"/> Visa Number | | | | | | | | | | | |
| <input type="checkbox"/> Passport Number | | | | | | | | | | | |



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|---|--|
| <input type="checkbox"/> Bank Account, Credit Card, or other financial account number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input type="checkbox"/> Other. <i>Please list:</i> | <input type="checkbox"/> Driver's License Number |
| | <input type="checkbox"/> Biometrics |

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

INA 264(f). USCIS collects SSNs to verify the identity of the applicant or requestor and determine eligibility for certain benefits.

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.

USCIS needs the foreign national's biographic information to verify the identity of the requestor. USCIS uses the A-number, name, alias, and birth date to determine if the individual is already in DHS systems and whether he or she has any relevant immigration history, or if the requestor is in removal proceedings. The address is used to determine the proper jurisdiction of the application or request and to mail notices, if applicable. The SSN may be used to verify the identity of the applicant or requestor.

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| 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>)? | <input checked="" type="checkbox"/> Yes. Please describe how notice is provided. The records subject, or his or her representative, is the one filling out the form. There is a Privacy Act Statement on the form. <input type="checkbox"/> No. |
|---|---|

3. How will DHS store the IC/form responses?

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| a. How will DHS store the original, completed IC/forms? | <input checked="" type="checkbox"/> Paper. Please describe. The form will be maintained in the requestor's A-file. <input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text. |
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| | <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text. |
| <p>b. If electronic, how does DHS input the responses into the IT system?</p> | <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. |
| <p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p> | <input checked="" type="checkbox"/> By a unique identifier. ² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. The A-number is used to query a requestor’s record in Central Index System. <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> |
| <p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p> | N1- 563-04-03 and N1-566-08-12 Follows same schedule as the A-file retention schedule. Because a request for deferred action is not a final action, the A-file will remain active and be stored at the National Records Center when not in use. |
| <p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p> | Records located at individual offices are deleted or transferred for permanent retention in accordance with records retention schedules. USCIS mandates that all employees, civilian or contractor, take annual standard and electronic records training. This training states that records management is everyone's responsibility and provides training on the proper retention of records. Retired records—those at Federal Records Centers—are tracked electronically and deleted or transferred for permanent retention according to the retention schedules. |

² 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.



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| | System records will typically have their retentions built into the system and are deleted or transferred for permanent retention according to the retention schedules. |
| 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. Click here to enter text. | |
| <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. | |
| <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)

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|---|---|
| Component Privacy Office Reviewer: | KIM E. MOTT |
| Date submitted to component Privacy Office: | January 4, 2017 |
| Date submitted to DHS Privacy Office: | January 6, 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. USCIS Office of Privacy developed a Privacy Act Statement and is seeking program and OCC approval. |
| 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> | |
| <p>Form G-325A is used to collect biographical information in conjunction with certain USCIS applications or requests. This updated PTA adds the G-325A's collection in conjunction with requests for deferred action submitted by certain family members of active-duty or Selected Reserve of the Ready Reserve military members, veterans, and enlistees as well as certain enlistees themselves. A separate PTA is being completed for this information.</p> <p>USCIS provides deferred action as an exercise of agency discretion to defer the removal action against certain individuals who are unlawfully present in the United States. Foreign nationals in the United States may request deferred action by submitting a letter to USCIS with evidence relevant to their situations. When determining whether to grant deferred action, USCIS makes a case-by-case discretionary judgment based on the totality of the evidence. USCIS considers certain factors particularly relevant to the exercise of discretion, including but not limited to: The fact that the individual requesting deferred action is a U.S. Department of Defense (DoD) Delayed Entry Program (DEP) enlistee or the spouse, parent, son, or daughter of a DEP enlistee; or the fact that the individual would be eligible for parole in placed under separate guidelines but for the fact that such individual has already been admitted. The existence of one or more of the</p> | |



above factors does not guarantee a grant of deferred action but may be considered a strong positive factor when assessing the totality of the facts of the individual request.

The Office of Privacy's recommendation is to designate this form as privacy sensitive with coverage under existing PIAs and SORNs.

PIA

- DHS/USCIS/PIA-061 Benefit Request Intake Process because this covers the process for initial intake and receipt of benefit requests submitted by individuals seeking immigration-related benefits provided in the Immigration and Nationality Act.

SORN

- DHS/USCIS/ICE/CBP-001 Alien File, Index and National File Tracking System of Records, November 21, 2013, 78 FR 69864 since this is stored with the A file.
- DHS/USCIS-007 Benefits Information System, October 19, 2016, 81 FR 72069, since the purpose of this system is to permit USCIS' collection, use, maintenance, dissemination, and storage of paper and electronic benefit request information



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

| | |
|--------------------------------------|---------------------|
| DHS Privacy Office Reviewer: | Max Binstock |
| PCTS Workflow Number: | 1137133 |
| Date approved by DHS Privacy Office: | January 10, 2017 |
| PTA Expiration Date | January 10, 2018 |

DESIGNATION

| | |
|--------------------------------|--|
| Privacy Sensitive IC or Form: | Yes If "no" PTA adjudication is complete. |
| 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 approved 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: | New e(3) statement is required. Click here to enter text. |
| PTA: | Updated system PTA required. Click here to enter text. |
| PIA: | PIA Appendix update required |



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|---|--|
| | <p>If covered by existing PIA, please list: DHS/USCIS/PIA-061 Benefit Request Intake Process</p> <p>If a PIA update is required, please list: Click here to enter text.</p> |
| <p>SORN:</p> | <p>System covered by existing SORN</p> <p>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</p> <p>If a SORN update is required, please list: Click here to enter text.</p> |
| <p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p> | |
| <p>USCIS is submitting this PTA because Form G-325A, Biographic Information is used to collect biographical information in conjunction with requests for deferred action submitted by certain family members of active-duty or Selected Reserve of the Ready Reserve military members, veterans, and enlistees as well as certain enlistees themselves.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because PII is collected from members of the public, specifically applicants, spouse, and potentially legal representative. PRIV finds that PIA coverage is provided by DHS/USCIS/PIA-061 pending a PIA Appendix Update to include Form G-325A, Biographic Information, the OMB Control Number, and the Case Management System associated with the form.</p> <p>PRIV finds that a PAS is required for Form G-325A, Biographic Information because the form asks members of the public to provide personal information about themselves which will be stored in a system of record.</p> <p>PRIV finds that a SORN is required because Form G-325A, Biographic Information retrieves information by a unique identifier.</p> <p>PRIV agrees with USCIS Privacy that the A-File SORN and BIS SORN provide adequate coverage. DHS/USCIS/ICE/CBP-001 covers the paper and electronic copy A-File and/or Receipt File, supplemental forms, supplemental evidence, and identity history summaries (formally known as RAP sheets), but does not include all case processing and decisional data. DHS/USCIS-007 covers USCIS' collection, use,</p> | |



maintenance, dissemination, and storage of benefit request information, including case processing and decisional data not included in the A-file.

This PTA will expire in one year.