



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-1450 | | |
| Form Title: | Authorization for Credit Card Transactions | | |
| Component: | U.S. Citizenship and Immigration Services (USCIS) | Office: | Office of Intake and Document Production |

IF COVERED BY THE PAPERWORK REDUCTION ACT:

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|--------------------------|---|-----------------------------------|------------------------|
| Collection Title: | Authorization for Credit Card Transactions | | |
| OMB Control Number: | 1615-0131 | OMB Expiration Date: | August 31, 2018 |
| Collection status: | Revision | Date of last PTA (if applicable): | April 24, 2015 |

PROJECT OR PROGRAM MANAGER

| | | | |
|---------|--|--------|--------------------------------|
| Name: | Elizabeth Post | | |
| Office: | Office of Intake and Document Production | Title: | Management and Program Analyst |
| Phone: | 9132145867/2027404978 | Email: | Elizabeth.a.post@uscis.dhs.gov |

COMPONENT INFORMATION COLLECTION/FORMS CONTACT



| | | | |
|---------|----------------------------------|--------|--------------------------------|
| Name: | Evadne J. Hagigal | | |
| Office: | Regulatory Coordination Division | Title: | Management and Program Analyst |
| Phone: | 202-272-0993 | Email: | Evadne.j.hagigal@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.

To provide additional payment options, the USCIS Office of Intake and Document Production (OIDP) is revising Form G-1450, *Authorization for Credit Card Transactions*, to collect fees directly associated with USCIS forms to be processed as payment at the USCIS Lockbox. Initially the G-1450 was only used with the Form N-400, *Application for Naturalization*. During the expansion phase of this project the agency is revising Form G-1450 to reflect credit card payment instructions and an updated Privacy Statement. In addition, the expanded phase will provide USCIS customers the option to pay approximately 40 benefit request filing fees that are processed through the USCIS Lockbox with a credit card.

Form G-1450, *Authorization for Credit Card Transactions*

Form G-1450 is submitted to a Lockbox location together with a benefit request form. Once received at the Lockbox, information on the G-1450 will be entered into Pay.gov – Trusted Collection Services (TCS) Interface through an encrypted methodology. Information from the G-1450 will not be entered into Lockbox or USCIS IT systems. Once the information has been entered into Pay.gov, the Form G-1450 will be destroyed.

Form G-1450 collects information about the credit card billing information, as well as the applicant’s first and last name. This information includes the authorized payment amount and the payer’s credit card information, including their name, address, signature, telephone number, and email address. This information is necessary for USCIS to correctly charge the appropriate fee for the form for which the applicant is applying. The payment information will be solely stored in Pay.gov.

For successful payments, the Lockbox will generate a bank transaction number, which will be added to Pay.gov and CLAIMS 3, CLAIMS 4, and ELIS, to link the payment information to the application. The bank transaction number is generated by the Lockbox and is passed into CLAIMS 3, CLAIMS 4, and ELIS through an existing system interconnection. The bank transaction number will be added to Pay.gov.



The G-1450 will be destroyed after the information is entered into Pay.gov whether the payment was successful or not. If the payment is unsuccessful, the benefit request will be rejected for invalid payment and the reason is included on the I-797, Notice of Action, which is an existing Lockbox function.

Relevant Information Technology

All G-1450 information will be processed through The U.S. Department of Treasury’s Pay.gov system. At no point in time will G-1450 information touch any Lockbox or USCIS IT system. USCIS CFO and ICE-Burlington Finance Center employees will have access to Pay.gov to perform payment research.

The applicant’s first and last names are being provided to ensure the correct G-1450 is associated with the correct benefit request at the Lockbox. This information will not be entered into a USCIS, U.S. Treasury, or Lockbox information system.

- 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 information requested on this authorization, and the associated evidence, is collected under section 286(m) of the Immigration and Nationality Act, 8 U.S.C. 1356(m).

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 <ul style="list-style-type: none"> <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. |

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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| <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 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 checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Individuals who or businesses that make fee payments on behalf of a beneficiary.</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> |
| <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 purpose of Form G-1450 is to collect credit card and credit billing information to pay for the fees associated with a benefit request form. There will be no changes to the data collections. They will remain consistent with the currently approved version of the form, dated 08/04/17 N. Form G-1450 collects the following information.</p> <p>Applicant/Petitioner/Requester's Information:</p> <p>First Name</p> <p>Middle Name (if any)</p> <p>Last Name</p> | |



Credit Card Billing Information (Credit Card Holder's Name as it Appears on the Card)

First Name
Middle Name (if any)
Last Name

Credit Card Holder's Billing Address

Street Number and Name
Apt. Ste. Flr. Number
City or Town
State
ZIP Code

Credit Card Holder's Signature and Contact Information

Credit Card Holder's Signature
Credit Card Holder's Daytime Telephone Number
Credit Card Holder's Email Address

Credit Card Information:

Credit Card Number
Credit Card Expiration Date
Credit Card Type (Visa, Master Card, American Express, Discover)
Authorized Payment Amount

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



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| g. List the specific authority to collect SSN or these other SPII elements. | |
| The information requested on this authorization, and the associated evidence, is collected under section 286(m) of the Immigration and Nationality Act, 8 U.S.C. 1356(m). | |
| 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. | |
| The primary purpose for providing the requested information is to authorize the USCIS Lockbox to make an electronic credit card payment for the filing fee and biometric services fee associated with a benefit request form. This is done through the U.S. Department of Treasury's Pay.gov Trusted Collection Services (TCS). TCS is a web-based application that allows Government agencies to process payments by credit or debit cards. It is owned and operated by the U.S. Department of Treasury, | |
| 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. Form G-1450 includes a USCIS Privacy Notice, and each Applicant/Petitioner/Requester will receive a Form I-797 Notice of Action from the Lockbox that their form fee has been paid. <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 type="checkbox"/> Paper. Please describe. Click here to enter text. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. After USCIS processes the Form G-1450 it will destroy the authorization, regardless if the agency approves or denies the accompanying application, petition, or request. USCIS will not store the credit card information from the G-1450. |



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| | <p>Payment transaction data is maintained in CLAIMS 3, CLAIMS 4, and ELIS.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> |
| <p>b. If electronic, how does DHS input the responses into the IT system?</p> | <p><input type="checkbox"/> Manually (data elements manually entered). Please describe.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</p> <p>N/A. The credit card information is put into U.S. Department of Treasury's Pay.gov, not a DHS IT system.</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 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. Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>Only the USCIS CFO and ICE Burlington employees will have access to the U.S. Treasury's Pay.gov ID Number.</p> |
| <p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p> | <p>The G-1450 will be destroyed after the information is entered into Pay.gov whether the payment was successful or not.</p> |
| <p>e. How do you ensure that records are disposed of or deleted in accordance with</p> | <p>The Lockbox is ultimately responsible for ensuring that records are disposed of or deleted in accordance with the records retention schedule.</p> |

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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| 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><input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.</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>The system shares information with the U.S. Department of the Treasury Pay.gov. There is an MOU between USCIS, U.S. Department of Treasury and the designated Financial Agent for Lockbox processing of fees and applications.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p> | |



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: | Jenny Hoots |
| Date submitted to component Privacy Office: | September 1, 2017 |
| Date submitted to DHS Privacy Office: | September 5, 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. Click here to enter text. |
| 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 Office of Privacy recommendation is to designate G-1450 as privacy sensitive with coverage under the following privacy compliance documentation: | |
| <u>System of Records Notice(SORNs)</u> | |
| <ul style="list-style-type: none"> • DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records, which covers the collection of information for applications, petitions, and benefit requests • DHS/USCIS-007 - Benefits Information System, which covers the collection of information about the applicant/petitioner/benefit requestor and the individual/business entity making the fee payment. | |
| <u>Privacy Impact Assessment (PIA)</u> | |
| <ul style="list-style-type: none"> • DHS/USCIS/PIA-061 Benefit Request Intake Process, which covers the USCIS Lockbox and fee processing. | |



**Homeland
Security**

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



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

| | |
|--------------------------------------|--------------------|
| DHS Privacy Office Reviewer: | Kameron Cox |
| PCTS Workflow Number: | 1149554 |
| Date approved by DHS Privacy Office: | September 19, 2017 |
| PTA Expiration Date | September 19, 2020 |

DESIGNATION

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|--------------------------------|--|
| 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: | September 18, 2017 |
| IC/Form PCTS Number: | Click here to enter text. |
| Privacy Act Statement: | A privacy notice is required. The privacy notice submitted is adequate. |
| PTA: | No system PTA required. Click here to enter text. |
| PIA: | System covered by existing PIA |



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| | If covered by existing PIA, please list: DHS/USCIS/PIA-061 Benefit Request Intake Process |
| SORN: | System covered by existing SORN If covered by existing SORN, please list: DHS/USCIS-007 Benefits Information System, October 19, 2016, 81 FR 72069 |
| DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i> | |
| <p>USCIS is submitting this PTA because it is revising Form G-1450, Authorization for Credit Card Transactions, to collect fees directly associated with USCIS forms to be processed as payment at the USCIS Lockbox, reflect credit card payment instructions, update the Privacy Statement, and expand Form G-1450 to cover 40 benefit request filing fees.</p> <p>The DHS Privacy Office (PRIV) agrees with USCIS that Form G-1450 is a privacy sensitive information collection and requires PIA coverage because it collects PII from members of the public. PRIV concludes that DHS/USCIS/PIA-061, Benefit Request Intake Process, adequately assesses the privacy risks involved with collecting and manually entering payment information from paper applications at lockbox facilities.</p> <p>PRIV finds that a SORN is required because the systems that store the information collected by Form G-1450 retrieve information by unique identifier. PRIV find that the DHS/USCIS-007 BIS SORN covers the collection and dissemination of benefit request information, including payment information. This program shares PII with the Treasury Department. This sharing is permitted under Routine Use Z of the BIS SORN and is compatible with the purpose of the BIS SORN because it allows the Department of Treasury to perform initial processing of benefit requests and to accept and resolve payment and any related issues.</p> <p>PRIV finds that a privacy notice is required to provide notice to individuals of the purpose, authority and disclosures of the information collection of Form G-1450. The privacy notice USCIS submitted is adequate.</p> | |



APPENDIX A: USCIS/OTHER FORMS

- EOIR-29
- I-102
- I-129F
- I-130
- I-131
- I-140
- I-212
- I-290B
- I-360
- I-485
- I-485A
- I-526
- I-539
- I-600
- I-600A
- I-601
- I-601A
- I-690
- I-694
- I-698
- I-765
- I-800
- I-800A
- I-817
- I-824
- I-821
- I-90
- N-336
- N-400
- N-600
- N-600K
- N-300
- N-470
- G-1041/A
- N-565



Homeland Security

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

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