



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:	N-445		
Form Title:	Notice of Naturalization Oath Ceremony		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Field Operations Directorate

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	N-445, Notice of Naturalization Oath Ceremony		
OMB Control Number:	1615-0054	OMB Expiration Date:	June 30, 2019
Collection status:	Revision	Date of last PTA (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	James Weidemann		
Office:	Field Operations	Title:	Adjudications Officer
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kerstin Jager
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Office:	Regulatory Coordination Division	Title:	Management and Program Analysis
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 responsible for the adjudication of all applications and petitions for immigration benefits in accordance with applicable laws, regulations, and procedures.

The Form N-445, Notice of Naturalization Oath Ceremony, was first used by legacy Immigration and Naturalization Service, and continues to be used by U.S. Citizenship and Immigration Services (USCIS) to notify applicants to appear (on a specific date and time) at a naturalization ceremony for administration of the oath of allegiance. The use of Form N-445 is mandated by federal regulation.

In addition to notifying applicants of a scheduled naturalization ceremony, Form N-445 is also used to verify an applicant’s continued eligibility for naturalization. The form contains a series of questions that must be answered by the applicant. The questions are designed so that USCIS officials can determine if an applicant has continued to maintain “good moral character” from the date of the interview up until the day of the naturalization ceremony. Failure on the part of the applicant to maintain “good moral character” prior to the naturalization ceremony may result in the applicant’s removal from the ceremony in order for USCIS to conduct further review.

Since the 2016 PTA, USCIS has added a QR code to the form. USCIS preprints applicant data (name, address, alien registration number) on Form N-445 before mailing it to the applicant through the U.S. Postal Service. In addition to the preprinted applicant data, USCIS also prints a machine-readable QR code on the N-



445 notice associated with an N-400 application that was filed electronically through the applicant’s USCIS online account. The QR code contains only the IOE number (i.e. the receipt number for an electronically filed application).

Additionally, since the 2016 PTA, the N-445 is now also processed in CLAIMS 4.

- 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.*

Authority for collection of the information requested on Form N-445 is contained in Sections 101(f), 313, 316, 332, 334, 335, and 336 of the Immigration and Nationality Act (8 U.S.C. 1101(F), 1427, 1443, 1445, 1446, and 1447).

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.
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 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

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.



	<input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" 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>	
<p>USCIS preprints applicant data (name, address, alien registration number) on Form N-445 before it is mailed to the applicant through the U.S. Postal Service. USCIS will also print a machine- readable QR code on N-445 notices associated with an N-400 application that was filed electronically through the applicant’s USCIS online account. The QR code contains only the IOE number (i.e. the receipt number for an electronically filed application).</p> <p>The applicant is asked to answer questions that are used by USCIS to determine continued eligibility for naturalization. After an applicant answers the questions, they must affirm their responses by means of their signature, date, and address.</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>	
<input type="checkbox"/> Social Security number <input checked="" type="checkbox"/> Alien Number (A-Number) <input type="checkbox"/> Tax Identification Number <input type="checkbox"/> Visa Number <input type="checkbox"/> Passport Number	<input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) <input type="checkbox"/> Social Media Handle/ID <input type="checkbox"/> Known Traveler 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 type="checkbox"/> Biometrics

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

Authority for collection of the information requested on Form N-445 is contained in Sections 101(f), 313, 316, 332, 334, 335, and 336 of the Immigration and Nationality Act (8 U.S.C. 1101(F), 1427, 1443, 1445, 1446, and 1447).

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 purpose of collecting the Alien Registration Number is to ensure association of the Form N-445 with the correct USCIS record.

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. A Privacy Act Statement is included on the Form, USCIS Office of Privacy is working to update the current Statement to a Notice. <input type="checkbox"/> No.
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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. The N-445s will be manually recorded into the CLAIMS 4 system before they are stored in the respective physical A-file. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. CLAIMS 4 and ELIS <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.
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	<p>USCIS will scan and upload the completed form in USCIS ELIS (USCIS Electronic Immigration System), after which the paper form will be destroyed (for new N-400 filings).</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 adjudicators manually enter information from the paper N-445 into CLAIMS 4, or the N-445 is scanned into USCIS ELIS.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</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.² <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)</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>The Form N-445 is ultimately stored in the A-file, which is permanently maintained, first at USCIS, and later by transfer to the National Archives and Records Administration (NARA). Records Schedule Number: NI-556_08-11.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>U.S. Immigration Records and Identity Services Directorate (IRIS) is responsible for ensuring its Records Branch maintains retention schedules for all records they are charged with safekeeping.</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.



f. Is any of this information shared outside of the original program/office? *If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?*

Yes, information is shared with other DHS components or offices. Please describe.
USCIS may share information from Form N-445 with other DHS components, as appropriate, particularly when the information may result in administrative and/or criminal proceedings.

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

USCIS may share information contained on Form N-445 with other federal agencies, state/local partners, international partners, or non-governmental entities as appropriate, particularly information that may result in criminal proceedings.

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:	Catherine Shorten
Date submitted to component Privacy Office:	October 6, 2017
Date submitted to DHS Privacy Office:	October 17, 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>	
<p>USCIS uses the N-445 to notify applicants to appear (on a specific date and time) at a naturalization ceremony for administration of the oath of allegiance. USCIS stores the N-445 in CLAIMS 4 and USCIS ELIS, depending on how the N-400 was filed. USCIS ultimately stores the forms in the A-file (paper or electronic). USCIS recommends coverage under the CLAIMS 4 PIA and USCIS ELIS PIAs which cover the processing of the form N-445. The BIS and A-file SORN also allows for the collection and storage of the N-445.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Kameron Cox
PCTS Workflow Number:	1152049
Date approved by DHS Privacy Office:	October 27, 2017
PTA Expiration Date	October 27, 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:	October 18, 2017
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	New e(3) statement is required. PN submitted with this PTA is adequate
PTA:	CLAIMS 4 PTA is adequate
PIA:	PIA Appendix update required If covered by existing PIA, please list:



	DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) and subsequent Updates; Update to Appendix of DHS/USCIS/PIA-056 USCIS Electronic Immigration System
SORN:	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list:</p> <p>DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556;</p> <p>DHS/USCIS-007 Benefits Information System, October 19, 2016 81 FR 72069</p>
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS is submitting this PTA to document the use of Form N-445. Form N-445 is used by persons who will become U.S. citizens upon taking the oath of allegiance in a formal public ceremony. Form N-445 was in use first by legacy Immigration and Naturalization Service, and continues to be used by USCIS to notify applicants to appear for a naturalization oath ceremony and to determine continued eligibility for naturalization.</p> <p>The DHS Privacy Office (PRIV) agrees with USCIS that Form N-445 is a privacy sensitive information collection that requires PIA coverage because it collects PII from members of the public. DHS/USCIS/PIA-016(a) CLAIMS 4 assesses the privacy risks of the collection, use, and storage of PII in the naturalization process, to include information collected for the citizenship oath ceremony. DHS/USCIS/PIA-056-ELIS will cover the storage of scanned N-445 forms in its system, but requires an appendix update to include the storage of Form N-445 to provide transparency to the public.</p> <p>PRIV finds that SORN coverage is required because Form N-445 collects PII that is retrieved by unique identifier. The DHS/USCIS/ICE/CBP-001 Alien File SORN covers the collection, use, and maintenance of PII throughout the immigration process, to include the citizenship oath ceremony. The DHS/USCIS-007 BIS SORN covers the use of applicant PII for the determination of “good moral character” that may not be reflected in the A-file.</p> <p>This PTA will expire in one year.</p>	