



## 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-907</b>		
<b>Form Title:</b>	<i>Request for Premium Processing Service</i>		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office:</b>	<b>SCOPs</b>

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

<b>Collection Title:</b>	<b>Form I-907</b>		
<b>OMB Control Number:</b>	1615-0048	<b>OMB Expiration Date:</b>	Click here to enter a date.
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	<b>July 2, 2014</b>

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Yanina Shteynberg		
<b>Office:</b>	SCOPS-EPIC	<b>Title:</b>	Adjudications Officer-Policy
<b>Phone:</b>	202-272-8177	<b>Email:</b>	Yanina.i.shteynberg@uscis.dhs.gov

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Evadne Hagigal		
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Office:	Regulatory Coordination Division	Title:	Management and Program Analyst
Phone:	Click here to enter text.	Email:	Click here to enter text.

## 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.*

**This PTA is being updated to document the form extension. The purpose of the Form I-907 is to request Premium Processing service for certain petitions or applications which are currently designated as eligible for premium processing by USCIS.**

**Currently, USCIS designated certain employment based immigrant and nonimmigrant visa petitions as eligible for the Premium Processing service. Petitioners may use Form I-907 to request expedited processing of certain employment-based visa categories. By filing the Form I-907 with the appropriate fee, the petitioner requests that his or her visa petition is processed within 15 calendar days. The processing time is met if USCIS issues an approval, a request for evidence, notice of intent to deny, or a denial notice within 15 calendar days of receipt or if the case is referred for investigation of suspected fraud or misrepresentation. Once USCIS receives a response to the request for evidence or notice of intent to deny, USCIS will guarantee 15-calendar-day processing from the date the response was received.**

**The Premium Processing is available for the *Form I-129, Petition for a Nonimmigrant Worker*, and *Form I-140, Immigrant Petition for Alien Worker*. Not all visa classifications within these forms are eligible for Premium Processing Service. For instance, the R-1 classification is only eligible after a successful on-site inspection at the location of employment.**

**Petitioner, applicant, or the attorney or accredited representative, may request Premium Processing service with the eligible petition or application, or after the eligible petition/application was already filed but before a final decision has been rendered. By filling out Form I-907, the petitioner, applicant, attorney or representative provides information about him or herself, the petitioning business (if not the filer of Form I-907) and the beneficiary.**



**Service Center Operations (SCOPS) is the responsible Program Office. SCOPS oversees the operations of the four regional service centers which process applications for immigration benefits based on the applicant’s employment in the United States.**

**The form I-907 relates to the USCIS mission by improving the efficiency and customer service of its delivery of immigration benefits to the public.**

**The previous form I-907 PTA, completed in July 2014, has expired. USCIS is resubmitting this PTA as part of the PRA renewal process. No substantive changes have been made to the form since the last PTA.**

**Relevant IT System**

**The form I-907 is processed in the Computer Linked Application Management System (CLAIMS 3) and stored in the subjects 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.*

**8 U.S.C. sections 1103 and 1356 authorizes USCIS to collect the information and the associated evidence for this benefit application.**

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? (Check all that apply.)	<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.

<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>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 checked="" 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 checked="" 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>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.</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><b>The categories of individuals for whom information is collected are members of the public who are statutorily eligible either as petitioners, applicants, beneficiaries, or attorneys or accredited representatives (e.g., interpreter and preparers).</b></p> <p><b>PII includes: A-number, Full name, address, company or organization’s IRS tax ID number, company or organization name, company point of contact, name, telephone number(s) , email address, and fax number, mailing address, USCIS ELIS number, and signature.</b></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 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 checked="" 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 type="checkbox"/> Bank Account, Credit Card, or other financial account number	<input type="checkbox"/> Biometrics
<input type="checkbox"/> Other. <i>Please list:</i>	

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, 1356 and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).**

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 PII is collected in order to help identify the primary Form I129 or I140 that was filed by the same petitioner or applicant and to which the I-907 is a supplemental request. It also enables USCIS to properly retrieve information about the petitioner or the beneficiary, if the PII information is included.**

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. Yes, through a Privacy Act Statement. The Statement is being updated and converted to a notice as a result of this update.  <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. Beneficiary's Alien File <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.  <b>CLAIMS 3</b>
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	<input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Enterprise Document Management System (EDMS)
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. <b>USCIS may scan the I-907 into its electronic databases when it digitized the Alien file.</b> <input type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a>
<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. <sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. The user can use the TAX ID, Alien Number, receipt numbers listed on the Form I-907, name, or other combined data elements. <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> <a href="#">Click here to enter text.</a>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p><b>CLAIMS 3:</b> CLAIMS 3 will delete and destroy records 50 years from the date of the last completed action. USCIS is working with NARA to update and consolidate the current retention schedules N1-563-04-03 and N1-566-08-12.</p> <p><b>A-File:</b> A-File records are permanent records in both electronic and paper form. USCIS transfers A-Files to the custody of NARA 100 years after the individual's date of birth [N1-566-08-11]</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with</p>	<p>The system owner is responsible for ensuring the records are deleted in accordance with the records retention schedule.</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. 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. Click here to enter text.  <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:	<b>Catherine Shorten</b>
Date submitted to component Privacy Office:	<b>September 18, 2017</b>
Date submitted to DHS Privacy Office:	September 20, 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. We have an approved PAS on file. USCIS is working to update and convert it to a Privacy Notice. <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>	
<b>USCIS recommends coverage under the following PIAs and SORNs:</b> <ul style="list-style-type: none"> <li>• <b>DHS/USCIS/PIA-016(a) CLAIMS 3 and Associated Systems</b></li> <li>• <b>DHS-USCIS-007 - Benefits Information System</b></li> <li>• <b>DHS/USCIS/ICE/CBP-001 – Alien File, Index, and National File Tracking System of Records</b></li> </ul>	



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Kameron Cox</b>
PCTS Workflow Number:	<b>1150585</b>
Date approved by DHS Privacy Office:	September 22, 2017
PTA Expiration Date	September 22, 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:	
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	<b>e(3) statement update is required.</b> Privacy Statement must be updated to a Privacy Notice.
PTA:	<b>CLAIMS 3 PTA is adequate</b>
PIA:	<b>System covered by existing PIA</b> If covered by existing PIA, please list: DHS/USCIS/PIA-061 Benefit Request Intake Process



	DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program
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, September 18, 2017, 82 FR 43556 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 to renew expiring compliance documentation for Form I-907. The purpose of the Form I-907 is to request Premium Processing service for certain petitions which are currently designated as eligible for premium processing by USCIS. There were no substantive changes to the form since the previous PTA adjudication.</p> <p>The DHS Privacy Office (PRIV) finds that Form I-907 is a privacy sensitive information collection that requires PIA coverage because it collects PII from members of the public. PRIV concludes that DHS/USCIS/PIA-061 Benefit Intake Process covers the collection and processing of the initial Form I-907 while DHS/USCIS/PIA-016(a) CLAIMS 3 covers the form's entry, use, and storage in that IT system. DHS/USCIS/PIA-003(b) IDDMP is necessary to provide coverage for the scanning of paper Form I-907 for entry into EDMS.</p> <p>PRIV agrees with USCIS that Form I-907 requires SORN coverage because PII it collects is stored in a system that retrieves information by a unique identifier. PRIV finds that the DHS/USCIS/ICE/CBP-001 Alien File SORN, which covers the collection, use, and maintenance of information from applicants as they move through the immigration process; and DHS/USCIS BIS SORN, which covers all information collected in the immigration benefit adjudication process not contained in the A-File, provides adequate coverage for Form I-907.</p> <p>PRIV finds that a Privacy Notice is required because form I-907 collects information from non-US Persons that is entered into a system of records. USCIS must update its privacy act statement to a privacy notice and eliminate reference to DHS-USCIS-015 Electronic Immigration System-2 in its routine uses. USCIS must also delete reference to 8 U.S.C. sections 1158, 1225, and 1228 and Title II of Public Law 105-100 as authorities of collection and replace it with 286(u) of the Immigration and Nationality Act (8 U.S.C. section 1356).</p>	



**Homeland  
Security**

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov)  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)