



## 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>	Form I-912		
<b>Form Title:</b>	Request for Fee Waiver		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office:</b>	Office of Intake and Document Production (OIDP)

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

<b>Collection Title:</b>	Form I-912, <i>Request for Fee Waiver</i>		
<b>OMB Control Number:</b>	1615-0116	<b>OMB Expiration Date:</b>	April 30, 2018
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	February 20, 2015

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Ernest DeStefano		
<b>Office:</b>	OIDP	<b>Title:</b>	Chief
<b>Phone:</b>	2022334237	<b>Email:</b>	Ernest.DeStefano@uscis.dhs.gov

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Sheri Sheehan		
<b>Office:</b>	OIDP	<b>Title:</b>	Division Chief
<b>Phone:</b>	8026520410	<b>Email:</b>	Sheri.F.Sheehan@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 this PTA to document the extension of the Form I-912. The form and instructions have not been revised. USCIS did not revise the USCIS Fee Waiver Guidelines Policy Memorandum. Individuals will continue to request a fee waiver by filing a paper waiver with the USCIS Lockbox. USCIS is updating this PTA to account for USCIS Electric Information System (USCIS ELIS) maintaining a scanned copy of the Form I-912.

#### ***I-912, Request for Fee Waiver***

The Office of Intake and Document Production (OIDP) leads the processes that support the beginning and end of most immigration transactions. Support for the beginning of the immigration process includes managing USCIS' forms design, printing and distribution processes, as well as those associated with application intake and fee collection.

USCIS is funded largely by those fees. Individuals may apply for and be granted a fee waiver for certain immigration benefits and services based on an inability to pay [authority is provided in Title 8 CFR 103.7(c) and INA section 286(m)]. The final rule "U.S. Citizenship and Immigration Services Fee Schedule," effective December 23, 2016, established a new fee schedule for immigration-benefit requests and amended the regulations governing fee-waiver eligibility. USCIS developed Form I-912, Request for Fee Waiver, in an effort to facilitate the fee waiver adjudication process and provide a standard means for submitting a fee waiver request.

In general, fee waiver requests are reviewed by considering, in a step approach, whether the applicant is receiving a means-tested benefit, whether the applicant's household income level renders him or her unable to pay, or whether recent financial hardship otherwise renders him or her unable to pay.

Form I-912 must be filed with an application or petition requesting an immigration benefit. The completed USCIS application(s) or petition(s), Form I-912, and all supporting documentation must be mailed to the USCIS office according to the "Where to File" directions in the application or petition form instructions to which the Form I-912 relates.



The information requested on Form I-912 and the associated evidence is collected under the Immigration and Nationality Act, section 101, et seq. The primary purpose for providing the requested information is to determine whether the individual has demonstrated an inability to pay the related application/petition fee(s) and ultimately to approve or deny the fee waiver request. The information is provided voluntarily by the applicant/petitioner. However, failure to provide the requested information and any requested evidence may delay a final decision or result in denying the fee waiver request and rejecting the application or petition based on non-payment of the fee.

**Relevant IT Systems:**

Upon receipt from the Lockbox, the image of the Form I-912 is scanned as supporting documentation to the underlying application/petition and stored in either the Enterprise Document Management System (EDMS) or USCIS ELIS, USCISs repositories for digitized versions of paper Alien-Files (A-Files) and Receipt Files. Additionally, depending on the form and support case tracking system, the acceptance or rejection of the fee waiver request is captured in the history action codes of Computer Linked Application Information Management System (CLAIMS 3) or CLAIMS 4. If the form is processed in USCIS Electric Information System (USCIS ELIS) Form I-912 images will be maintained in USCIS ELIS as the official record and a history action code is also captured in USCIS ELIS.

- 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.*

USCIS is funded largely by application and petition fees. Recognizing that some applicants cannot pay the filing fees, USCIS established a fee waiver process for certain forms and benefit types. We will approve a fee waiver only if you clearly demonstrate that you are unable to pay the filing fee

- s. USCIS carefully considers the merits of each fee waiver request before making a decision. See regulations: 8 CFR 103.7(c)(3).

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	<input checked="" type="checkbox"/> Members of the public

<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>collect information?  <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</p> <p><input checked="" type="checkbox"/> Non-U.S. Persons.</p> <p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input type="checkbox"/> Other federal employees or contractors.</p>
<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 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 <b>that is NOT the record subject.</b> <i>Please describe.</i>      Interpreter and preparer.</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 primary purpose for providing the requested information in Form I-912 is to determine whether the individual has demonstrated an inability to pay the related application/petition fee(s) and ultimately to approve or deny the fee waiver request.</p>	



Specifically, the applicant/petitioner provides:

- Basis for the request
- Full Name
- Alien Registration Number (A-Number)
- Online Account Number
- Social Security number (SSN)
- Date of Birth
- Marital Status
- Immigration Status
- Classification
- Employment Status
- Application/Petition for which the request is being submitted with
- Information regarding award of a Means-Tested Benefit
  - name of person receiving the benefit
  - name of agency awarding the benefit, and
  - date benefit was awarded
- Household Income (including evidence of income or other support)
- Explanation of Financial Hardship Employment Status
- Assets and their Value
- Average Costs (including evidence of monthly costs and payments)
- Signature

Information about the dependents includes:

- Full name
- A-Number
- Date of Birth
- Relationship to the applicant/petitioner

Information about the Preparer includes:

- Full Name
- Business or Organization
- Mailing Address
- Telephone Number
- Fax Number
- Email Address
- Signature



Information about the Interpreter includes:

- Full Name
- Business or Organization
- Mailing Address
- Telephone Number
- Email Address
- Signature

Data elements 2 through 6 help ensure the I-912 can be matched to the application or petition. The rest of the data elements listed above are used for adjudication of the fee waiver request.

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 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"/> 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 checked="" type="checkbox"/> Other. <i>Please list: Online Account Number</i>  |  |

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

Individuals may apply for and be granted a fee waiver for certain immigration benefits and services based on an inability to pay [authority is provided in Title 8 CFR 103.7(c) and INA section 286(m)]. The final rule "U.S. Citizenship and Immigration Services Fee Schedule," effective December 23, 2016, established a new fee schedule for immigration-benefit requests and amended the regulations governing fee-waiver eligibility.

The Social Security Number (SSN) is included to provide the applicant with clearer options for providing their information and assisting USCIS in identifying the applicant, matching up documentation and reducing or deterring cases of fraud.





<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>USCIS uses the SSN in identifying the applicant, matching up documentation and reducing or deterring cases of fraud. For example if an Applicant shares the same name with a member of their family also identified on the form, without the inclusion of the SSN, a USCIS analyst may not be able to match the Means-Tested Benefits (MTB), tax, and income supporting documents to the applicant and the application could be may be denied. It can also be utilized to ensure the benefit is being issued to the correct individual.</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. Applicants or representative provide the information in the form I-912 at the time of filing. A Privacy Notice is included on the form instructions.</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. The Form I-912 will be retained in the applicants'/petitioners' A-File.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. The image of the Form I-912 is scanned as supporting documentation into the Enterprise Document Management System (EDMS), part of the Integrated Digitization Document Management Program (IDDMP). The image of the Form I-912 is also scanned as supporting documentation into the Electronic Immigration System (USCIS ELIS).</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.  <a href="#">Click here to enter text.</a></p> <p><input type="checkbox"/> Automatically. Please describe.  <a href="#">Click here to enter text.</a></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.</p> <ul style="list-style-type: none"> <li>• Full Name</li> <li>• Alien Registration Number (A-Number)</li> <li>• USCIS Online Account Number</li> <li>• SSN</li> <li>• Date of Birth</li> </ul> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i>    Receipt Number    Transaction Number</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p><b>A-Files</b>, including USCIS ELIS[N1-566-08-11] – permanent records  <b>EDMS</b>: [N1-566-08-17] – permanent records</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>USCIS follows the records retention schedule for filing and destruction of records.</p>
<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.  <a href="#">Click here to enter text.</a></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.



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

[Click here to enter text.](#)

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:	June 15, 2017
Date submitted to DHS Privacy Office:	July 24, 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 Privacy Office recommendation is to designate Form I-912 as a privacy sensitive form with coverage under the following:	
<p><b><u>PIA</u></b></p> <ul style="list-style-type: none"> <li>• <b>DHS/USCIS/PIA-003 - Integrated Digitization Document Management Program (IDDMP)</b>, which covers the digitization of paper-based case files (A-Files and Receipt Files) and storing them in the EDMS.</li> <li>• <b>DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4)</b>, which covers the action history code in CLAIMS 4.</li> <li>• <b>DHS/USCIS/PIA-016 - Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3)</b>, which covers the action history code in CLAIMS 3.</li> <li>• <b>DHS-USCIS-PIA-056 USCIS ELIS</b>, which covers the digitization of paper-based case files (A-Files and Receipt Files) and storing them in the USCIS ELIS as well as the history code.</li> </ul> <p><b><u>SORN</u></b></p>	



- **DHS/USCIS-001 - Alien File, Index, and National File Tracking System of Records**, which covers the collection, use, and maintenance of A-Files.
- **DHS-USCIS-007 - Benefits Information System**, which covers the collection, use, and storage of benefit waivers.



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Kameron Cox</b>
PCTS Workflow Number:	1147221
Date approved by DHS Privacy Office:	July 28, 2017
PTA Expiration Date	July 28, 2018

### 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:	Choose an item. A privacy notice is required
PTA:	Choose an item. Current system PTA is adequate
PIA:	<b>PIA Appendix update required</b> If covered by existing PIA, please list:



	<p>DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program (IDDMP)  DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4)  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:</p>
<p>SORN:</p>	<p><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:</p>
<p>DHS Privacy Office Comments:  <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS is submitting this PTA to document the extension of the Form I-912. The form and instructions have not been revised. USCIS did not revise the USCIS Fee Waiver Guidelines Policy Memorandum. Individuals will continue to request a fee waiver by filing a paper waiver with the USCIS Lockbox. USCIS is updating this PTA to account for USCIS Electric Information System (USCIS ELIS) maintaining a scanned copy of the Form I-912.</p> <p>The DHS Privacy Office (PRIV) finds that the I-912 is a privacy sensitive form because it collects PII from members of the public. PRIV agrees with USCIS’s recommendation that a PIA is required because the I-912 form collects PII from members of the public. PRIV concludes there is adequate coverage from existing PIAs. DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) and DHS/USCIS/PIA 016 Benefits Processing of Applicants other than Petitions for Naturalization, Refugee Status, and Asylum (CLAIMS 3) properly assesses the privacy risks for the collection and use of the information contained on form I-912. DHS/USCIS/PIA-003 Integrated Digitization Document Management Program (IDDMP) covers the digitization of form I-912 and its storage in EDMS systems with its history code. PRIV finds, however, that DHS/USCIS/PIA-056 USCIS ELIS requires an updated Appendix A to include the form I-912 to provide coverage for storage on the system. PRIV finds that a SORN is required because the information collected by form I-912 is retrieved by unique identifier. This collection is covered by DHS-USCIS-007 Benefits Information System, which covers the collection, use, and storage of financial information for the purposes of</p>	



processing benefit requests. DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records, covers the collection, use, and maintenance of form I-912 within A-Files.

PRIV finds that a Privacy Notice is required to inform the individual about the authority to collect the information requested, purposes for collecting it, routine uses, and consequences of providing or declining to provide the information to USCIS.

This PTA will expire in one year. Two additional years coverage will be provided from the date of adjudication following the publishing of an update to USCIS ELIS Appendix A