



## 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-910</b>		
<b>Form Title:</b>	<b>Application for Civil Surgeon Designation</b>		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Field Operations Directorate

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

<b>Collection Title:</b>	<b>Form I-910, Application for Civil Surgeon Designation</b>		
OMB Control Number:	1615-0114	OMB Expiration Date:	May 31, 2018
Collection status:	Revision	Date of last PTA (if applicable):	June 30, 2016

#### PROJECT OR PROGRAM MANAGER

Name:	Angela Honer		
Office:	Field Operations Directorate	Title:	Adjudications Officer
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#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kerstin Jager		
Office:	PRA Compliance Branch	Title:	MPA



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.*

Section 212(a)(1)(A) of the Immigration and Nationality Act (Act) renders individuals inadmissible if the individual is afflicted with the statutorily mentioned diseases or medical conditions (these diseases and conditions include communicable diseases of public health significance, failure to meet vaccination requirements, mental or physical disorders with associated harmful behavior, or drug abuse or addiction). In order to establish that the individual is admissible when seeking adjustment of status to a legal permanent resident (and in certain cases other aliens seeking an immigration benefit), the individual must submit Form I-693, Report of Medical Examination and Vaccination Record, that is completed by a civil surgeon, a USCIS- designated physician.

The statutory basis for the designation of civil surgeons and the medical examination of aliens is contained in section 232 of the INA and 8 CFR 232.2. To be selected as a civil surgeon, the physician has to demonstrate that he or she is a licensed physician with no less than 4 years of professional experience. The National Benefits Center (NBC) currently adjudicates all requests for civil surgeon designation, which are filed on Form I-910, Application for Civil Surgeon Designation. Since March 11, 2014, adjudication of Form I-910 has been centralized at NBC.

USCIS is updating this PTA to include the following changes:

- A-file number (if applicable) added to part 1, page 2, item number 9
- Substantive standard language and renumbering changes made throughout the form and instructions
- Employment authorization document (EAD) question added to part 3, page 3, item number 4
- Declaration added to part 7, Page 4, item number 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.*

Section 232 of the INA and 8 CFR 232.2

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? ( <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 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  <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor.

<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.



	<input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <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 checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> <a href="https://www.uscis.gov/system/files_force/files/form/i-910.pdf?download=1">https://www.uscis.gov/system/files_force/files/form/i-910.pdf?download=1</a>
<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>To apply for civil surgeon designation, USCIS requires a civil surgeon to submit the following information:</p> <ul style="list-style-type: none"> <li>• A properly completed and signed Form I-910, with the required fee;</li> <li>• A copy of a current medical license (for each state in which the physician seeks to complete immigration medical examinations);</li> <li>• A copy of each of the physician’s medical degrees, either as a Doctor of Medicine (M.D.) or as a Doctor of Osteopathy (D.O.);</li> <li>• Proof of four years of professional experience, excluding any time spent in post-medical school training. Evidence of professional experience includes, but is not limited to, evaluations, certificates of completion, business tax returns or business licenses (for self-employed physicians), or letters of employment verification; and</li> <li>• Proof of employment authorization in the United States.</li> </ul> <p>The Form I-910 collects the following required data:        First, middle and last name; date of birth; gender; USCIS ELIS account number (if any); Civil Surgeon Identification Number (CSID) (if any); the physician’s clinical office location(s); medical school and degree information; state medical license information; immigration status in the United States; and proof of four years of professional experience, including the names and contact information of the physician’s employers.</p>	



The Form I-910 also collects the following optional data about the physician’s medical practice where he or she intends to perform medical examinations: email address, website address, acceptable means of payment, accepted medical insurance plans; languages spoken; office hours; handicap accessibility; and an “other” blank that allows the physician to include any other office information that might be helpful to the public. This information will be included in the Civil Surgeon Locator (now Find a Doctor) in the future to assist applicants in searching for a civil surgeon.

This data collection is necessary to determine whether a physician meets the statutory and regulatory requirements for civil surgeon designation. For example, for all documents are reviewed to determine whether the physician has a currently valid medical license or and whether the physician has had any action taken against him or her by the medical licensing authority of the state.

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                         |
| <input checked="" type="checkbox"/> Alien Number (A-Number)                           | Personal Identifier (EDIPI)  |
| <input type="checkbox"/> Tax Identification Number                                    | <input type="checkbox"/> Social Media Handle/ID                                  |
| <input type="checkbox"/> Visa Number  | <input type="checkbox"/> Known Traveler Number                                   |
| <input checked="" type="checkbox"/> Passport 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: CSID number</i>                       | <input type="checkbox"/> Biometrics  |

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

Section 232 of the INA and 8 CFR 232.2 allows USCIS to collect SPII in order to adjudicate the Form I-910.

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.

This data collection is necessary to determine whether a physician meets the statutory and regulatory requirements for civil surgeon designation. All documents are reviewed



to determine whether the physician has a currently valid medical license or and whether the physician has had any action taken against him or her by the medical licensing authority of the state.

<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. Yes, an acknowledgement of receipt notice is provided by the Lockbox as well as an acceptance or rejection letter from NBC is provided. Furthermore, USCIS provides a Privacy Notice to the individual on the form instructions prior to collecting any information.</p> <p><input type="checkbox"/> No.</p>
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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.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. NPWR</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. National Benefits Center Processing Workflow Repository (NPWR)</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. Data input by contractors and signature page is scanned in.</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.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Receipt numbers are generated with a “CSD” prefix and uploaded into National File Tracking System (NFTS), and a unique CS Identification Number (CSID) is generated for each civil surgeon applicant.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> <a href="#">Click here to enter text.</a></p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Paper files are stored for 35 years at Harrisonburg (HBG) in accordance with DAA-0566-2014-0001</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Harrisonburg personnel are responsible for ensuring the records are disposed of once the 35 year records retention schedule has been met</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. USCIS does not routinely share information with other DHS components to designate physicians as civil surgeons. However, in the event USCIS suspects a physician of fraud, USCIS will forward the case to ICE for potential criminal investigation.</p> <p><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. USCIS does not routinely share information with external components. However, USCIS may share this information with the Department of Health and Human Services (HHS) during the course of the civil surgeon application process as required by law</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.





and pursuant to Routine Use Q in the DHS/USCIS-007 Benefits Information System SORN.

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>January 5, 2018</b>
Date submitted to DHS Privacy Office:	January 10, 2018
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>
<p>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>	
<p>The USCIS Office of Privacy recommendation is to designate Form I-910 as a privacy sensitive form with coverage under the following:</p> <p>PIAs</p> <ul style="list-style-type: none"> <li>• Civil Surgeon Designation PIA, which covers the information collected through the Form I-910, used, and maintained by the respective IT systems</li> <li>• myUSCIS PIA, which covers the Find a Civil Surgeon locator.</li> </ul> <p>SORNs</p> <ul style="list-style-type: none"> <li>• DHS/USCIS-007 BIS SORN, which USCIS updated to cover the collection, use, and maintenance of civil surgeon data</li> </ul> <p>USCIS has converted the previous Privacy Act Statement to a Privacy Notice.</p>	



## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Kameron Cox</b>
PCTS Workflow Number:	<b>1156149</b>
Date approved by DHS Privacy Office:	January 10, 2018
PTA Expiration Date	January 10, 2021

### 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 approved this ICR/Form.
Date IC/Form Approved by PRIV:	January 10, 2018
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	<b>New e(3) statement is required.</b> Privacy Notice is sufficient
PTA:	<b>NPWR PTA is adequate</b>
PIA:	<b>System covered by existing PIA</b>



	If covered by existing PIA, please list: DHS/USCIS/PIA-064 myUSCIS DHS/USCIS/PIA-067 Civil Surgeon Designation
SORN:	<b>System covered by existing SORN</b> 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 to update Form I-910, <i>Application for Civil Service Designation</i>, to include the A-number, Employment Authorization Documentation, and other substantive information to the form. Form I-910 is used by physicians to be selected as a civil surgeon that can then conduct medical examinations on applicants for immigration benefits. The physician has to demonstrate that he or she is a licensed physician with no less than 4 years of professional experience.</p> <p>The DHS Privacy Office (PRIV) agrees with USCIS Privacy that Form I-910 is a privacy sensitive information collection requiring PIA coverage because it collects PII from members of the public. PRIV finds that DHS/USCIS/PIA-067 Civil Surgeon Designation assesses the risks surrounding the collection, use, and adjudication of the physician’s information for purposes of accrediting the physician as a civil surgeon. DHS/USCIS/PIA-064 myUSCIS covers the use of physician office location information for use on the online “find a doctor” application.</p> <p>Form I-910 requires SORN coverage because it collects information that is retrieved by a unique identifier. PRIV concludes that DHS/USCIS-007 covers the collection of physician information for the purposes of assisting in the processing of immigration benefits.</p> <p>PRIV further finds that Form I-910 requires a privacy notice because it may collect PII from non-US persons that would then be entered into a system of records.</p>	