



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-28; G-28I		
Form Title:	Notice of Entry of Appearance as Attorney or Representative; Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Office of Chief Counsel

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Form G-28, Notice of Entry of Appearance as Attorney or Representative Form G-28I, Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States		
OMB Control Number:	1615-0105	OMB Expiration Date:	March 31, 2018
Collection status:	Revision	Date of last PTA (if applicable):	March 19, 2014

PROJECT OR PROGRAM MANAGER

Name:	Catherine M. O'Connell		
Office:	Office of Chief Counsel	Title:	Disciplinary Counsel



Phone: 313-926-4212 Email: Catherine.OConnell@uscis.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kerstin Jager		
Office:	Regulatory Coordination Division	Title:	Adjudication Officer
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.

Form Revision

USCIS is submitting the Form G-28/28I PTA to formally document the revision of the Form G-28, *Notice of Entry of Appearance as Attorney or Accredited Representative*, and Form G-28I, *Notice of Entry of Appearance as Attorney in Matters Outside the Geographic Confines of the United States*, which includes, standard form language such as, USCIS Online Account Number, Receipt Number, Contact Information of Attorney or Accredited Representative, and Contact Information of Applicant

Overview

Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative

DHS has designated Form G-28 as the document on which attorneys and accredited representatives provide information to establish their eligibility to appear for and act on behalf of an applicant, petitioner, or respondent in immigration matters. An attorney or accredited representative appearing before DHS must file Form G-28 in each case. USCIS, CBP, and/or ICE will only recognize Form G-28 for the appearance of an attorney or accredited representative once the applicant, petitioner, requestor, or respondent has completed, signed, and filed Form G-28.



A beneficiary of a petition is not a recognized party in a proceeding before USCIS under 8 CFR 103.2(a)(3). USCIS, CBP, and/or ICE will recognize Form G-28 until the conclusion of the matter for which it is entered. An applicant, petitioner, requestor, or respondent must file a new Form G-28 with the Administrative Appeals Office when filing an appeal to that office on Form I-290B, Notice of Appeal or Motion.

Form G-28I, Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States

An attorney admitted to the practice of law in a country other than the United States who seeks to appear before DHS in a matter outside the geographical confines of the United States must file Form G-28I in each case. Form G-28I must be properly completed and signed by the applicant, petitioner, or respondent to authorize representation for the appearance to be recognized by USCIS, CBP, and ICE. Under 8 CFR 103.2(a)(3), a beneficiary of a petition is not a recognized party in a proceeding before USCIS. Form G-28I will be recognized by USCIS, CBP, or ICE until the conclusion of the matter for which it was entered.

Relevant Information Technology

G-28/G-28I is processed along with a principal form or any other form on which the alien is being represented. This form is placed in the A-file of the individual who is represented. It is also placed in the receipt 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.*

The G-28 is based on DHS having the authority to discipline attorneys who represent clients in immigration matters before DHS. The authority for that is the Secretary of Homeland Security's (Secretary) authorities under the Homeland Security Act of 2002, Public Law 107-296, section 102, 116 Stat. 2135, 6 U.S.C. 112, and the Immigration and Nationality Act of 1952, as amended (INA or Act), section 103(a), 8 U.S.C. 1103(a), to administer and enforce the immigration and naturalization laws and to discharge other related DHS functions. Under such authorities, DHS regulates immigration practitioners appearing or seeking to appear before U.S. Citizenship and Immigration Services (USCIS), U.S. Immigration and Customs Enforcement (ICE), and U.S. Customs and Border Protection (CBP).



8 CFR 103.2 and 292.1 allow persons entitled to representation to be represented in matters before U.S. Citizenship and Immigration Services (USCIS), U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection, Department of Homeland Security (DHS). Representatives must file an appearance on the appropriate form in each case. 8 CFR 292.4.

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? (Check all that apply.)	<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? (Check all that apply.)	<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 checked="" type="checkbox"/> Business entity. <ul style="list-style-type: none"> If a business entity, is the only information collected business contact information? <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor.

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"/> 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 checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link: https://myaccount.uscis.dhs.gov/</i> (At this link, representatives can set up a USCIS Online Account, which provides access to forms that are available for e-filing. A Form G-28 can be submitted electronically along with any primary form that is available for e-filing.)
<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><u>Form G-28, Notice of Entry of Appearance as Attorney or Representative</u></p> <p>Information Collected About the Attorney or Accredited Representative</p> <ul style="list-style-type: none"> • Last name • First name • Middle name • Name of Law Firm • Law Firm Address • Daytime Telephone Number • Mobile Telephone Number • Email address (if any) • USCIS Online account number (if any) • Attorney bar number (if any) • States of admission • Eligibility information for Attorney or Accredited Representative • Licensing Authority • Name of Recognized Organization • Date of Accreditation 	



- Name of Law Student or Law Graduate working under the direct supervision
- Appearance related to previous immigration matters
- U.S. Citizenship and Immigration Services (USCIS) form numbers
- U.S. Immigration and Customs Enforcement (ICE) and specific matter in which appearance is entered
- U.S. Customs and Border Protection (CBP) and specific matter in which appearance is entered
- Appearance as attorney or accredited representative at the request of
- Signature of Attorney or Accredited Representative
- Signature of Law Student or Law Graduate
- Date of Signature

Information Collected About the Applicant, Petitioner, Requestor, or Respondent

- Last name
- First name
- Middle name
- Mailing address
- Name of company or organization (if applicable)
- USCIS Online account number (if any)
- A-Number (if any)
- Receipt number (if any)
- Daytime Telephone Number
- Mobile Telephone Number (if any)
- Email Address
- Mailing Address of Applicant, Petitioner, Requestor, or Respondent
- Consent to Representation and Release of Information
- Signature of Applicant, Petitioner, Requestor, or Respondent
- Request to receive original notices/and or secure identity documents directly or sent to the attorney of record or accredited representative
- Date of Signature

Form G-28I, Notice of Entry of Appearance as Attorney in Matters Outside the Geographical Confines of the United States

Information About Attorney

- USCIS Online Account number (if any)



- Last Name
- First Name
- Middle Name
- Name of Law Firm (if Applicable)
- Attorney Address
- Daytime Telephone Number
- Mobile Telephone Number (if any)
- Email Address (if any)
- Eligibility Information for Attorney
- Licensing Authority
- Bar Number (if applicable)
- Notice of Appearance as Attorney Admitted to Practice Outside the United States
- U.S. Citizenship and Immigration Services and form numbers
- U.S. Immigration and Customs Enforcement (ICE) and specific matter in which appearance is entered
- U.S. Customs and Border Patrol (CBP) and specific matter in which appearance is entered
- Appearance as Attorney at the request of the applicant, petitioner, or respondent (ICE, CBP)
- Signature of Attorney
- Date of Signature

Information About Applicant, Petitioner, or Respondent

- Last Name
- First Name
- Middle Name
- Name of Company or Organization (if applicable)
- USCIS Online Account Number (if any)
- Alien Registration Number (if any)
- Receipt Number (if any)
- Daytime Telephone Number
- Email Address (if any)
- Mailing Address of Applicant, Petitioner, or Respondent
- Consent to Representation and Release of Information



- Request to receive original notices and/or secure identity documents directly or sent to the attorney of record
- Request for DHS to send any original notice containing Forms I-94, Arrival-Departure Record, to U.S. mailing address
- Signature of Applicant, Petitioner or Respondent
- Date of Signature

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 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 type="checkbox"/> Other. <i>Please list:</i> | |

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

8 CFR 103.2 and 292.1 allow persons entitled to representation to be represented in matters before U.S. Citizenship and Immigration Services (USCIS), U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection, Department of Homeland Security (DHS). Representatives must file an appearance on the appropriate form in each case. For USCIS to accurately identify the person on whose behalf the appearance is being entered, USCIS collects the person's Alien Registration Number, along with other personally identifiable information. Collecting the A-Number along with other PII ensures that the representative entering an appearance is provided with information only pertaining to the person being represented, and not with information related to a different person.

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 data collected on Forms G-28 and G-28I is used by DHS to determine eligibility of the individual to appear as a representative. The information collected via these forms, which allows a person to represent someone else in front of USCIS, is not available anywhere else and is unique to these forms. If the representative is eligible, the form is filed with the case and the information is entered into DHS systems for whatever type of application or petition it may be.

<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. There is a Privacy Notice in the corresponding form instructions.</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. G-28/G-28I is processed along with a principal form or any other form on which the applicant, petitioner, or respondent is being represented. This form is placed in the A-file of the individual who is represented. It is also placed in the receipt file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. G-28 information can be provided in connection with a USCIS form that is available for electronic filing. Information for an e-filed G-28 is stored in the USCIS Electronic Immigration System (ELIS). (The G-28I cannot be e-filed.) G-28 data can also be stored electronically in CLAIMS 3, CLAIMS 4, and RAPS/APSS.</p>



	<p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> <p>Scanned G-28 and G-28I forms may be stored in the Electronic Data Management System (EDMS) when they are part of an A-file that has been digitized.</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.</p> <p>Information from Form G-28 is manually keyed into CLAIMS 3, CLAIMS 4, ELIS and RAPS/APSS.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.</p> <p>Form G-28 data provided by the respondent is automatically entered into USCIS ELIS when the form is submitted via e-filing.</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.</p> <p>Depending on the system being searched, a user may search by A-Number, Name, and/or USCIS Online Account Number,</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>Click here to enter text.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>A-File: N1-566-08-11 CLAIMS 3: DAA-0566-2016-0013; DAA-0566-2016-0009 CLAIMS 4: DAA-0566-2017-0017 RAPS/APSS: N1-563-04-06/ N1-563-04-07 ELIS: N1-566-12-05; N1-566-11-02 EDMS: N1-566-08-17</p>
<p>e. How do you ensure that records are disposed of or deleted</p>	<p>All Form G-28 and G-28I are retained and disposed of/deleted according to the retention schedules listed above.</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.



in accordance with 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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Information is shared with operational programs across DHS to inform them of representation. Information may be shared with Fraud Detection and National Security Directorate or Homeland Security Investigations for the purposes of conducting investigations or, in attorney discipline cases, preliminary inquiries. <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. Information may be shared with state bar associations, attorney disciplinary authorities and local law-enforcement agencies that are investigating practitioners, persons, or entities who may be committing improper or fraudulent acts. <input 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:	Nina Robinson
Date submitted to component Privacy Office:	August 17, 2017
Date submitted to DHS Privacy Office:	September 13, 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>The USCIS Office of Privacy recommendation is to designate Form G-28/28I as privacy sensitive with coverage under the following privacy compliance documentation:</p> <p>PIA</p> <ul style="list-style-type: none"> • DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) Update, which covers the electronic storage and processing of G-28 only • DHS/USCIS/PIA-016 Computer Linked Application Information Management (CLAIMS 3) and Associated Systems, which covers data elements from the Form G-28 entered into CLAIMS 3 • Forthcoming myUSCIS PIA, which covers the Form G-28 submission and processing via the USCIS Online account • DHS/USCIS/PIA-056 ELIS, which covers the storage of information from Form G-28 entered into ELIS when the form is submitted via e-filing • DHS/USCIS/PIA-027(c)- USCIS Asylum Division, which covers the electronic storage and processing of the G-28 in RAPS/APSS 	



- DHS/USCIS/PIA-003(b)- Integrated Digitization Document Management Program (IDDMP), which covers the digitization and storage of G-28 and G-28I forms stored in the Electronic Data Management System (EDMS)
- DHS/USCIS/PIA-007(b) Domestically Filed Intercountry Adoptions and Petitions, which covers attorney and representative information used to process intercountry adoptions
- DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO), which covers the processing of the Form G-28 along with the Form I-290B
- DHS/USCIS/PIA-013(a) Fraud Detection and National Security Data System (FDNS-DS), which covers the information from the Form G-28 that may be shared with FDNS during the adjudicative and administrative investigation process

SORN

- DHS/USCIS/ICE/CBP-001- Alien File, Index, and National File Tracking System of Records, which covers the collection, use, and storage of the form stored in the A-file and Receipt file
- DHS/USCIS-007 Benefits Information System of Records, which covers the collection, use, and storage of data elements USCIS collects from the attorney or accredited representative, applicant, petitioner, requestor, or respondent
- DHS/USCIS- 010 Asylum Information and Pre-Screening System of Records, which covers the collection, use and storage of data elements collected from attorneys and accredited representatives stored in CLAIMS 3 and RAPS/APSS
- DHS/USCIS-005 Inter-Country Adoptions Security , which covers the collection, use, and storage of data elements (biographical information) collected from attorneys and representatives that facilitate the adoption process so that USCIS can track and verify those entities that are authorized to participate in the adoption process
- DHS/USCIS-017 Refugee Case Processing and Security Screening Information, which covers the collection, use and storage of data elements (biographical information) collected from attorneys and representatives who complete applications on behalf of refugee applicants
- DHS/USCIS-006 Fraud Detection and National Security Records, which covers the collection, use, and storage of the representative and preparer information maintained in the G-28



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Kameron Cox
PCTS Workflow Number:	1150078
Date approved by DHS Privacy Office:	September 20, 2017
PTA Expiration Date	September 20, 2020

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:	September 19, 2017
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	New e(3) statement is required. New Privacy Notice is Required
PTA:	No system PTA required. Click here to enter text.
PIA:	PIA update is required. If covered by existing PIA, please list:



	<p>DHS/USCIS/PIA-013(a) Fraud Detection and National Security Data System (FDNS-DS); DHS/USCIS/PIA-015(b) Computer Linked Application Information Management System (CLAIMS 4) Update; DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems; DHS/USCIS/PIA-056 USCIS Electronic Immigration System; DHS/USCIS/PIA-027(c) USCIS Asylum Division; DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program; DHS/USCIS/PIA-007(b) Domestically Filed Intercountry Adoptions Applications and Petitions; DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO); DHS/USCIS/PIA-061 Benefit Request Intake Process</p> <p>If a PIA update is required, please list: Forthcoming myUSCIS PIA</p>
<p>SORN:</p>	<p>System covered by existing SORN 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/USCIS-010 Asylum Information and Pre-Screening System of Records, November 30, 2015, 80 FR 74781; DHS/USCIS-005 Inter-Country Adoptions Security, November 8, 2016, 81 FR 78614; DHS/USCIS-017 Refugee Case Processing and Security Screening Information System of Records, October 19, 2016, 81 FR 72075; DHS/USCIS-006 Fraud Detection and National Security Records (FDNS) August 8, 2012, 77 FR 47411</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS is submitting this PTA to formally document the revision of the Form G-28 and G-28I that includes the addition of the USCIS online account number, receipt number, contact information of attorney or accredited representative, and contact information of applicant.</p> <p>The DHS Privacy Office (PRIV) finds that Forms G-28 and G-28I are a privacy sensitive information collection and a PIA is required because the forms collects PII from members of the public. PRIV agrees with USCIS about coverage under the following PIAs:</p> <p>DHS/USCIS/PIA-061 Benefit Request Intake Process, which covers the collection and use of all benefit request forms, to include Form G-28 and G-28I. DHS/USCIS/PIA-015 CLAIMS 4</p>	



covers the electronic storage and processing of Form G-28, DHS/USCIS/PIA-016 CLAIMS 3 covers data from Form G-28 entered into CLAIMS 3, and DHS/USCIS/PIA-027(c) USCIS Asylum Division covers the electronic storage and processing of data from Form G-28 within RAPS/APSS. DHS/USCIS/PIA-007(b) Domestically Filed Inter-country Adoptions and Petitions, and DHS/USCIS/PIA-051 CAMINO assess the privacy risks of processing Form G-28 information as part of the adjudicative process. DHS/USCIS/PIA-056 ELIS covers the storage of information from Form G-28 entered into ELIS when the form is submitted via e-filing on USCIS online. DHS/USCIS/PIA-003(b) IDDMP covers the digitization and storage of G-28 and G-28I forms stored in the Electronic Data Management System (EDMS). DHS/USCIS/PIA-013(a) FDNS covers the sharing of attorney information for cases involving fraud or national security concerns on the part of the applicant or the attorney.

Finally, an update is required for the myUSCIS PIA to cover the Form G-28 submission and processing via the USCIS Online account. As the online submission process for myUSCIS is the same as USCIS ELIS, the ELIS PIA is able to provide interim coverage.

PRIV finds that a SORN is required because information collected on Forms G-28 and G-28I can be retrieved by a unique identifier. The forms are covered by DHS/USCIS/ICE/CBP-001- A-File, which covers the collection, use, and storage of the form stored in the A-file and Receipt file; DHS/USCIS-007 BIS, which covers the collection, use, and storage of the form and data elements USCIS collects in processes outside of the A-File except for Refugee and Asylum applications. DHS/USCIS-005 Inter-Country Adoptions Security provides additional coverage for data collected from attorneys and representatives as part of the adoption process. DHS/USCIS-010 Asylum and DHS/USCIS-017 Refugee Case Processing cover the collection, use and storage of data elements collected from attorneys and accredited representatives stored in CLAIMS 3 and RAPS/APSS. DHS/USCIS-006 FDNS SORN covers the collection, use, and storage of form G-28 information for purposes of aiding investigations into fraud, attorney discipline, and national security.

This program contemplates sharing attorney and representative PII with local law enforcement state bar associations in cases of suspected fraud or misconduct. This sharing is permitted under Routine Use G of the A-File, BIS, Adoption, Asylum, Refugee, and FDNS SORNs. This sharing is compatible with the purpose of the SORNs because it facilitates the administration, and ensures the integrity, of the legal immigration system.

PRIV recommends that when USCIS makes updates to the A-File SORN, BIS SORN, Asylum SORN, and Refugee SORN it include the myUSCIS account # for attorneys/representatives as a data element in their respective categories of records and retrieval of records.

PRIV finds that a Privacy Notice is required because Forms G-28 and G-28I collect PII from individuals, including non-US persons, which will be entered into a system of records. PRIV



concludes that the Privacy Notice USCIS submitted concurrently with this PTA provides adequate notice.

This PTA will expire in one year.