



PRIVACY THRESHOLD ANALYSIS (PTA)

This form serves as the official determination by the DHS Privacy Office to identify the privacy compliance requirements for all Departmental uses of personally identifiable information (PII).

A Privacy Threshold Analysis (PTA) serves as the document used to identify information technology (IT) systems, information collections/forms, technologies, rulemakings, programs, information sharing arrangements, or pilot projects that involve PII and other activities that otherwise impact the privacy of individuals as determined by the Chief Privacy Officer, pursuant to Section 222 of the Homeland Security Act, and to assess whether there is a need for additional Privacy Compliance Documentation. A PTA includes a general description of the IT system, information collection, form, technology, rulemaking, program, pilot project, information sharing arrangement, or other Department activity and describes what PII is collected (and from whom) and how that information is used and managed.

Please complete the attached Privacy Threshold Analysis and submit it to your component Privacy Office. After review by your component Privacy Officer the PTA is sent to the Department's Senior Director for Privacy Compliance for action. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 202-343-1717

PIA@hq.dhs.gov

Upon receipt from your component Privacy Office, the DHS Privacy Office will review this form and assess whether any privacy compliance documentation is required. If compliance documentation is required – such as Privacy Impact Assessment (PIA), System of Records Notice (SORN), Privacy Act Statement, or Computer Matching Agreement (CMA) – the DHS Privacy Office or component Privacy Office will send you a copy of the relevant compliance template to complete and return.



Privacy Threshold Analysis (PTA)

Specialized Template for Information Collections (IC) and Forms

The Forms-PTA is a specialized template for Information Collections and Forms. This specialized PTA must accompany all Information Collections submitted as part of the Paperwork Reduction Act process (any instrument for collection (form, survey, questionnaire, etc.) from ten or more members of the public). Components may use this PTA to assess internal, component-specific forms as well.

Form Number: N-565

Form Title:	Application for Replacement Naturalization Citizenship Document		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Service Center Operations

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: N-565, *Application for Replacement Naturalization Citizenship Document*

OMB Control Number:	1615-0091	OMB Expiration Date:	June 30, 2019
Collection status:	Extension	Date of last PTA (if applicable):	May 8, 2018

PROJECT OR PROGRAM MANAGER

Name:	William Ward		
Office:	Service Center Operations	Title:	Adjudication Officer
Phone:	202-272-1712	Email:	William.ward2@uscis.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name: Kerstin A. 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.

2018 Update:

USCIS is updating Form N-565 to include following updates:

- Include the collection of biometric processing information: Ethnicity, race, height, weight, eye color, and hair color.
- Clarify reasons for the application and provide more detailed instructions. For example, USCIS is standardizing the Biometric Services appointment language on forms to notify individuals that biometric information may be required.
- The Immigration Biometric and Background Check SORN is added as coverage.

N-565. Application for Replacement Naturalization Citizenship Document

Section 343(a) of the Immigration and Nationality Act (INA) provides that if any certificate of naturalization or citizenship issued to any citizen or any declaration of intention furnished to any declarant is lost, mutilated, or destroyed, the citizen or declarant may make application to the Secretary of Homeland Security for a new certificate or declaration.

Form N-565 is used to apply to U.S. Citizenship and Immigration Services (USCIS) for a replacement of one of the following:

1. Certificate of Naturalization;
2. Certificate of Citizenship;
3. Declaration of Intention;
4. Repatriation Certificate; or



5. To apply for a special certificate of naturalization to be recognized as a U.S. citizen by a foreign country.

The form is provided by USCIS to determine the applicant’s eligibility for a replacement document. An applicant may file for a replacement if he or she was issued one of the documents described above and it was lost, mutilated, or destroyed, or if the applicant’s name was changed by a marriage or by court order after the document was issued and now seeks a document in the new name. If the applicant is a naturalized citizen who desires to obtain recognition as a citizen of the United States by a foreign country, he or she may apply for a special certificate for that purpose.

Relevant IT System

Individuals may use myUSCIS online account to electronically file N-565. Once submitted, the N-565 is transferred to USCIS ELIS for case processing.

Previously, the N-565 was processed and stored in CLAIMS 3. Beginning May 2018, USCIS will begin processing the Form N-565 in the USCIS Electronic Immigration System (USCIS ELIS). Form N-565’s previously ingested into CLAIMS 3 will continue being processed in CLAIMS 3 until the form is approved/denied. All newly filed Form N-565’s will solely be processed in USCIS ELIS. USCIS anticipates that USCIS ELIS will become the primary system for storing data from newly filed N-565s starting in FY 18 Q4. Form N-565 and its supplemental evidence is stored in the applicant’s 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.*

INA Sec. 343. [8 U.S.C. 1454]

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 |
|---|--|

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.



<p>b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> Members of the public</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</p> <p style="padding-left: 20px;"><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 type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> 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 checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i> https://www.uscis.gov/n-565</p>



e. What information will DHS collect on the form? *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.*

From the Applicant, this form collects:

- Full Legal Name
- Alias(es)
- Gender
- Height
- Marital Status
- Date of Birth
- Country of Birth
- Certificate Number
- Alien Registration Number (A-Number)
- Mailing Address
- Telephone Numbers
- Email Address
- Signature
- Ethnicity
- Height
- Weight
- Race
- Eye Color
- Hair Color

This form collects the following processing information:

- Basis for application
- USCIS Office of Name Of Court that issued last certificate
- Date Last Certificate was issued

From an Interpreter, this form collects:

- First and Last Name
- Business or Organization Name
- Mailing Address
- Telephone Numbers
- Email Address
- Signature



From a Preparer, this form collects:

- First and Last Name
- Business or Organization Name
- Mailing Address
- Telephone Numbers
- Email Address
- 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.

INA Sec. 343. [8 U.S.C. 1454]

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.

Alien numbers, also called alien registration numbers, or A-numbers are identification numbers issued to noncitizens by USCIS. The information collected in association with the Alien Number is for tracking and record keeping purposes. The purpose of this will allow internal employees the ability to track and work the application. This collection is needed due to the sheer number of N-565s that are received and ingested into USCIS systems.



<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. The accompanying instructions for Form I-565 includes a Privacy Notice notifying the individual of the authority, purpose, routine uses, and disclosure of information Please note that the N-565 can also be filled out by a third party agency, after a properly executed G-28 is filed.</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. Form N-565 is stored in the applicant's A-file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. N-565 data will be stored in both CLAIMS 3 and USCIS ELIS. No new forms will be processed using CLAIMS 3 and forms filed prior to May 2018 will continue being processed in CLAIMS 3. All new forms will solely be processed in USCIS ELIS.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. When Form N-565 is ingested at Lockbox, USCIS will store a scanned version of the N-565 in the Electronic Immigration System (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.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. As USCIS moves toward storing new N-565 data in ELIS, these forms will be ingested at the Lockbox instead of a Service Center, and the data will be sent automatically from Lockbox into USCIS ELIS..</p>



<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><input checked="" type="checkbox"/> By a unique identifier.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Alien Registration Number (A-Number), Receipt Number, and/or Name and Date of Birth are the unique identifiers used to retrieve information from CLAIMS3 and ELIS.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Form N-565: DAA-0566-2016-0016, Citizenship and Naturalization Forms; published 9/9/2016</p> <p>CLAIMS 3: DAA-0566-2016-0009</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Local Records follows the Records Policy Manual (RPM) as well as retention schedules as required and set forth by Immigration Records and Identity Management (IRIS) Directorate.</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. Click here to enter text.</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. Click here to enter text.</p> <p><input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</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.



**Homeland
Security**

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
www.dhs.gov/privacy



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:	Maisonobe G. Fokwa Kengne
Date submitted to component Privacy Office:	September 25, 2018
Date submitted to DHS Privacy Office:	November 16, 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. Click here to enter text.
<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 N-565 as a privacy sensitive form with coverage under the following:</p> <p><u>PIAs</u></p> <ul style="list-style-type: none"> DHS/USCIS/PDHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, which covers the forms ingested into CLAIMS 3 for processing and adjudication prior to May 2018 DHS/USCIS/PIA-056 USCIS ELIS which covers the processing and adjudication of electronically filed Form N-565, as well as paper forms received after May 2018 DHS/USCIS/PIA-071 MyUSCIS Account Experience, which covers the completion and online submission of certain USCIS forms. <p>USCIS Office of Privacy is concurrently submitting the USCIS ELIS and myUSCIS Account Experience PIA Appendices to account for these new forms.</p> <p><u>SORN</u></p>	



- DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records, which covers the collection, use, and storage of the Form N-565 and supplemental documents in the A-File
- DHS/USCIS-007 Benefits Information System, which covers the collection, use and storage of data elements USCIS collects from benefit requestors, preparers, and interpreters
- DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records, which covers the collection, use, and maintenance of biometric information



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Hannah Burgess
PCTS Workflow Number:	1171840
Date approved by DHS Privacy Office:	November 19, 2018
PTA Expiration Date	November 19, 2021

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:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	Choose an item. Click here to enter text.
PTA:	Choose an item. Click here to enter text.



PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list: DHS/USCIS/PDHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems; DHS/USCIS/PIA-056 USCIS ELIS; DHS/USCIS/PIA-071 MyUSCIS Account Experience If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>System covered by existing SORN</p> <p>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-018 Immigration Biometric and Background Check (IBBC) System of Records, July 31, 2018, 83 FR 36950 If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS is submitting this PTA to discuss updates to Form N-565, Application for Replacement Naturalization Citizenship Document. USCIS is standardizing the biometric services appointment language on forms to notify individuals biometric information may be required, and is including the collection of biometric processing information (such as height, weight, eye color) on this form.</p> <p>The DHS Privacy Office agrees that this is a privacy sensitive collection, requiring PIA coverage. Coverage for the forms ingested into CLAIMS 3 for processing and adjudication prior to May 2018 continues to be provided by DHS/USCIS/PDHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3). Coverage for the processing and adjudication of the electronically filed forms, as well as paper forms received after May 2018, is provided by DHS/USCIS/PIA-056 USCIS ELIS, and coverage for the online completion and submission of the forms is provided by DHS/USCIS/PIA-071 MyUSCIS Account Experience.</p> <p>SORN coverage is also required, and is provided by DHS/USCIS-001 Alien File and DHS/USCIS-007 Benefits Information System. DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records has been added as additional coverage.</p>	