



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-426

Form Title: Request for Certification of Military or Naval Service

Component: U.S. Citizenship and Immigration Services (USCIS) Office: Field Operations Directorate

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: Form N-426, Request for Certification of Military or Naval Service

OMB Control Number: 1615-0053 OMB Expiration Date: July 31, 2019

Collection status: Revision Date of last PTA (if applicable): December 1, 2016

PROJECT OR PROGRAM MANAGER

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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name: Kerstin Jager



Office:	Office of Policy and Strategy	Title:	Management and Program Analyst
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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 Revision

Form N-426, *Request for Certification of Military or Naval Service*, is set to expire on July 31, 2019. USCIS is revising the Form N-426 to collect additional data elements. Recent changes in DoD policy required changes to USCIS policy and procedures. These changes require amending Form N-426 to gather additional needed fields to ensure compliance with the policy changes. Since the last PTA adjudication, Form N-426 is now collecting the requestor’s country of citizenship, country of naturalization, province for place of enlistment, province for residence during enlistment, province for place of reenlistment, and province for residence during reenlistment. Form N-426 is also collecting additional information about the Certifying Official – branch of service, component, rank, and work telephone number.

Form N-426, *Request for Certification of Military or Naval Service*

Pursuant to Sections 328 and 329 of Immigration and Nationality Act (INA), USCIS must defer to the determination of the Department of Defense (DoD) holding the military service records when reviewing an applicant for naturalization’s affirmed honorable service in the United States Military.

Persons who are serving or have served under specified conditions in the Armed Forces of the United States are granted certain exemptions from the general requirements for naturalization. To establish eligibility, the law requires the departments with custody of



the service records to certify when the service member served and whether each separation from the service was under honorable conditions.

The purpose of Form N-426 is to maintain a uniform, streamlined mechanism for DoD to certify an applicant’s characterization of military or naval service. The applicant submits Form N-426 to the appropriate branch of the U.S. military service in which he or she is currently serving or had served for certification of military service. Proper completion of this form by the applicant and certifying official serve as an authenticated certification of military service.

Current or former members of the U.S. Armed Forces who are applying for naturalization under section 328 or 329 of the INA submits the following with Form N-426:

1. Form N-400, *Application for Naturalization*, and
2. Copy of Form DD Form 214, *Certificate of Release of Discharge from Active Duty*, or NGB Form 22, *National Guard Report of Separation and Records of Service*.

Relevant IT system

Receipt of Form N-426 is noted in CLAIMS 4. No data (other than the notation of receipt) from the Form N-426 is stored in CLAIMS 4. The form 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.*

Sections 328 and 329 of the INA and Title 8 of Code of Federal Regulations (8 CFR) Parts 328 and 329.

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	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents

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>collect information? (Check all that apply.)</p>	<p><input checked="" type="checkbox"/> Non-U.S. Persons.</p> <p><input checked="" type="checkbox"/> DHS Employees Please note that DoD enlists members of the United States Coast Guard. Though, these individuals serve under DoD when training and while deployed; they are DHS employees the majority of the time.</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input checked="" type="checkbox"/> Other federal employees or contractors.</p>
<p>c. Who will complete and submit this form? (Check all that apply.)</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.). A preparer may fill the Form N-426 out if they have also submitted a Form G-28 with the Form N-400.</p> <p><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</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input checked="" type="checkbox"/> DHS employee or contractor.</p> <p><input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Certain Service Members, civilian employees, or contractors of the Department of Defense may act as conduits and submit the form in response to a request for evidence (RFE) by USCIS on behalf of the Service Member and with the expressed permission and consent of the Service Member.</p> <p>Please note that DoD enlists members of the United States Coast Guard. Though, these</p>



	<p>individuals serve under DoD when training and while deployed; they are DHS employees the majority of the time. Some may be enlisted as Lawful Permanent Residents require naturalization.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <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>There are no new data elements being collected as a result of the 2018 revision of Form N-426. However, there were data elements that were not accounted for on the previous PTA adjudication. The list below contains a full inventory of PII collected by type of individual.</p>	
<p><u>Information about the Requestor:</u></p> <ul style="list-style-type: none"> • Alien Number • Military Service Number • Full name • Other names used • Social Security number • USCIS Online Account Number • Date of birth • Place of birth (country and city) • Country of citizenship • Country of nationality • Physical address • Information about place of enlistment (country, city, state, province) • Information about residence when requestor enlisted (country, city, state, province) • If applicant reenlisted • Information about place of reenlistment (country, city, state, province) 	



- Information about residence when requestor reenlisted (country, city, state, province)
- Periods of military service (branch of service, service start date, service end date, type of service)
- Daytime phone number
- Mobile phone number
- Email address
- Signature

Information about the Certifying Official:

- Full name
- Rank
- Title
- Branch of Service
- Component
- Work phone number
- Military email address
- Signature

The Certifying Official must indicate whether the requestor served honorably or is currently serving honorably for each period of military service the requester served. The Certifying Official must also indicate if the requestor separated and, if so, whether it was an honorable discharge, other discharge, or a discharge on account of alienage.

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 |
| <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 type="checkbox"/> Passport Number | <input type="checkbox"/> Trusted Traveler Number (Global |
| <input type="checkbox"/> Bank Account, Credit Card, or other | Entry, Pre-Check, etc.) |
| financial account number | <input type="checkbox"/> Driver's License Number |
| <input checked="" type="checkbox"/> Other. <i>Please list:</i> Military Service | <input type="checkbox"/> Biometrics |
| Number, USCIS Online Account Number | |

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



INA 264(f) (8 U.S.C. 1304(f)) provides the Secretary of Homeland Security with the specific authority to collect SSNs of those applying for immigration benefits. USCIS collects the SSN to facilitate the adjudication of the application. The SSN is used to establish and corroborate the requestor's identity.

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.

DoD does not utilize A-Numbers when maintaining records of alien service members. USCIS must have a standardized approach for verifying an applicant's Characterization of Service. Without the information provided in the Form N-426, the service member would have little to no ability to demonstrate eligibility to naturalize pursuant to honorable United States military service. Information collected will be used to verify the requestor's Characterization of Service as required under Sections 328 and 329 of the INA. Form N-426, and the information collected by it, allows the applicant a straightforward approach to demonstrating eligibility for naturalization.

i. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of the collection or is form filled out by third party*)?

- Yes. Please describe how notice is provided.
Individuals completing the form are notified via a Privacy Notice in the instructions for the Form N-426.
- No.

3. How will DHS store the IC/form responses?

a. How will DHS store the original, completed IC/forms?

- Paper. Please describe.
Form N-426 will be stored in the individual's A-File.
- Electronic. Please describe the IT system that will store the data from the form.
[Click here to enter text.](#)
- Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.
[Click here to enter text.](#)



<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. Click here to enter text.</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.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Information can be retrieved by name, date of birth, A-Number, Receipt number, or combination of the above data elements.</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-426: DAA-0566-2016-0017 covers the adjudicative decision of Form N-426. Records are retained for 100 year(s) after the requestor’s date of birth.</p> <p>A-File: N1-566-08-11 covers A-File records as permanent value.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>The system owner is responsible for ensuring the records are deleted in accordance with a retention schedule.</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.</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.



Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe. At times, the Form N-426 may be shared with our law enforcement partners within DoD via appropriate channels and “need to know” standards.

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:	Amanda Hoffmaster
Date submitted to component Privacy Office:	May 14, 2018
Date submitted to DHS Privacy Office:	May 31, 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 type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. The Privacy Notice is in draft and will be reviewed and approved by USCIS' OCC.
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 Office of Privacy recommends designating Form N-426 as a privacy sensitive form with coverage under the following:

PIA

- DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) (and subsequent updates), which covers the processing of N-400 Applications for Naturalization and supplemental documents such as the N-426.

SORN

- DHS-USCIS-001 Alien File, Index, and National File Tracking System, which covers the physical and electronic immigration files, including A-Files and Receipt Files.
- DHS/USCIS-007 Benefits Information System, which covers the collection, use, and storage of data elements USCIS collects about benefit requestors, beneficiaries, legal representatives, interpreters, and preparers.



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Hannah Burgess
PCTS Workflow Number:	1164078
Date approved by DHS Privacy Office:	June 25, 2018
PTA Expiration Date	June 25, 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 If covered by existing PIA, please list: DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<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 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 as part of the PRA renewal process to discuss Form N-426, Request for Certification of Military or Naval Service. This form is used to provide a uniform method for the Department of Defense to certify an individual's characterization of their military or naval service. USCIS is required to defer to the determination of the Department of Defense when reviewing an applicant for naturalization's affirmed service in the U.S. military.</p> <p>An applicant submits the form to the appropriate branch of the military service in which he or she served or is serving. The form contains PII and SPII about the applicant, which is used to verify the applicant's service. The form also collects work contact information about a military certifying official.</p> <p>The DHS Privacy Office agrees that this form is privacy sensitive, requiring PIA coverage. Coverage is provided by DHS/USCIS/PIA-015 CLAIMS 4, which covers the processing of naturalization documents and associated supplemental documents. Receipt of Form N-426 is noted in CLAIMS 4. SORN coverage is also required, as information is retrieved by personal identifier. Coverage is provided by DHS/USCIS-001 Alien File, Index and National File Tracking System, which covers the physical and electronic Alien File, in which Form N-426 is stored. Coverage is also provided by DHS/USCIS-007 Benefits Information System, which covers data elements about benefit requestors, beneficiaries, preparers, and interpreters.</p>	