



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-600 | | |
| Form Title: | Application for Certificate of Citizenship | | |
| Component: | U.S. Citizenship and Immigration Services (USCIS) | Office: | External Affairs Directorate |

IF COVERED BY THE PAPERWORK REDUCTION ACT:

| | | | |
|----------------------------|---|--|-------------------|
| Collection Title: | Form N-600, <i>Application for Certificate of Citizenship</i> | | |
| OMB Control Number: | 1615-0057 | OMB Expiration Date: | December 31, 2018 |
| Collection status: | Revision | Date of last PTA (if applicable): | August 17, 2016 |

PROJECT OR PROGRAM MANAGER

| | | | |
|----------------|-----------------------|---------------|--|
| Name: | Lorra Wilkinson | | |
| Office: | Office of Citizenship | Title: | Adjudications Officer |
| Phone: | (206) 450-8859 | Email: | Lorra.M.Wilkinson@uscis.dhs.gov |

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

| | | | |
|--------------|---------------|--|--|
| Name: | Kerstin Jager | | |
|--------------|---------------|--|--|



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

USCIS submitting the Form N-600 PTA Update because USCIS plans to support the electronic filing of Form N-600 in myUSCIS. This form is also undergoing the Paperwork Reduction Act process. USCIS is updating the Form N-600 to provide clarifying language in the instructions to align with the Immigration and Nationality Act (INA) and Title 8 of the Code of Federal Regulations. No revisions were made to the information collection; however, this PTA Update is accounting for the collection of identifying information that was not captured in the previously adjudicated PTA.

Form N-600, Application for Certificate of Citizenship

Under Section 103 of the INA, USCIS is tasked with determining US citizenship of those residing in the United States upon application.

Form N-600 is the form completed and submitted to obtain evidence of U.S. citizenship demonstrating that the applicant derived citizenship. USCIS uses the information collected on Form N-600 to determine if a Certificate of Citizenship can be issued to the applicant. Citizenship law has changed over the years and different laws apply to determine whether the applicant automatically became a U.S. citizen at birth, or after birth but before they turned 18 years of age.

Form N-600 is used by respondents who are requesting a Certificate of Citizenship because they were born outside the United States to a U.S. citizen parent. This form is



also used by applicants requesting a Certificate of Citizenship because they automatically became a citizen of the United States after birth, but before they turn 18 years of age. Form N-600 can also be filed by a parent or legal guardian on behalf of a minor child.

The form collects information that is necessary to determine eligibility for a Certificate of Citizenship, which is further detailed in section 2.e. The information on Form N-600 is supported with evidence submitted by the applicant. Adjudication of the application depends on meeting the eligibility requirements of the applicable section of the INA. The application is approved or denied based on information supplied on the form and submitted evidentiary attachments.

The qualifying conditions for citizenship are outlined in the relevant INA sections below:

Via the INA Section 320 (most often):

(a) A child born outside of the United States automatically becomes a citizen of the United States when all of the following conditions have been fulfilled:

- (1) At least one parent of the child is a citizen of the United States, whether by birth or naturalization.
- (2) The child is under the age of eighteen years.
- (3) The child is residing in the United States in the legal and physical custody of the citizen parent pursuant to a lawful admission for permanent residence.

(b) Subsection (a) shall apply to a child adopted by a United States citizen parent if the child satisfies the requirements applicable to adopted children under section 101(b)(1).

Via INA Section 301: The following shall be nationals and citizens of the United States at birth:

- (a) a person born in the United States, and subject to the jurisdiction thereof;
- (b) a person born in the United States to a member of an Indian, Eskimo, Aleutian, or other aboriginal tribe: Provided, That the granting of citizenship under this subsection shall not in any manner impair or otherwise affect the right of such person to tribal or other property;
- (c) a person born outside of the United States and its outlying possessions of parents both of whom are citizens of the United States and one of whom has had a residence in the United States or one of its outlying possessions, prior to the birth of such person;
- (d) a person born outside of the United States and its outlying possessions of parents one of whom is a citizen of the United States who has been physically present in the United States or one of its outlying possessions for a continuous period of one year prior to the



birth of such person, and the other of whom is a national, but not a citizen of the United States;

(e) a person born in an outlying possession of the United States of parents one of whom is a citizen of the United States who has been physically present in the United States or one of its outlying possessions for a continuous period of one year at any time prior to the birth of such person;

(f) a person of unknown parentage found in the United States while under the age of five years, until shown, prior to his attaining the age of twenty-one years, not to have been born in the United States;

(g) a person born outside the geographical limits of the United States and its outlying possessions of parents one of whom is an alien, and the other a citizen of the United States who, prior to the birth of such person, was physically present in the United States or its outlying possessions for a period or periods totaling not less than five years, at least two of which were after attaining the age of fourteen years: Provided, That any periods of honorable service in the Armed Forces of the United States, or periods of employment with the United States Government or with an international organization as that term is defined in section 1 of the International Organizations Immunities Act (59 Stat. 669; 22 U.S.C. 288) by such citizen parent, or any periods during which such citizen parent is physically present abroad as the dependent unmarried son or daughter and a member of the household of a person (A) honorably serving with the Armed Forces of the United States, or (B) employed by the United States Government or an international organization as defined in section 1 of the International Organizations Immunities Act, may be included in order to satisfy the physical-presence requirement of this paragraph. This proviso shall be applicable to persons born on or after December 24, 1952, to the same extent as if it had become effective in its present form on that date; and

(h) a person born before noon (Eastern Standard Time) May 24, 1934, outside the limits and jurisdiction of the United States of an alien father and a mother who is a citizen of the United States who, prior to the birth of such person, had resided in the United States.

Via INA Section 309: Children Born Out of Wedlock

(a) The provisions of paragraphs (c), (d), (e), and (g) of section 301, and of paragraph (2) of section 308, shall apply as of the date of birth to a person born out of wedlock if-

(1) a blood relationship between the person and the father is established by clear and convincing evidence,

(2) the father had the nationality of the United States at the time of the person's birth,



(3) the father (unless deceased) has agreed in writing to provide financial support for the person until the person reaches the age of 18 years, and

(4) while the person is under the age of 18 years-

(A) the person is legitimated under the law of the person's residence or domicile,

(B) the father acknowledges paternity of the person in writing under oath, or

(C) the paternity of the person is established by adjudication of a competent court.

(b) Except as otherwise provided in section 405, the provisions of section 301(g) shall apply to a child born out of wedlock on or after January 13, 1941, and before December 24, 1952, as of the date of birth, if the paternity of such child is established at any time while such child is under the age of twenty-one years by legitimation.

(c) Notwithstanding the provision of subsection (a) of this section, a person born, after December 23, 1952, outside the United States and out of wedlock shall be held to have acquired at birth the nationality status of his mother, if the mother had the nationality of the United States at the time of such person's birth, and if the mother had previously been physically present in the United States or one of its outlying possessions for a continuous period of one year.

Or via repealed INA Section 321:

Section 321 of the former Act, states, in pertinent part, that:

(a) A child born outside of the United States of alien parents, or of an alien parent and a citizen parent who has subsequently lost citizenship of the United States, becomes a citizen of the United States upon fulfillment of the following conditions

(1) The naturalization of both parents; or

(2) The naturalization of the surviving parent if one of the parents is deceased; or

(3) The naturalization of the parent having legal custody of the child when there has

been a legal separation of the parents or the naturalization of the mother if the child was born out of wedlock and the paternity of the child has not been established by legitimation, and if

(4) Such naturalization takes place while said child is under the age of 18 years; and

(5) Such child is residing in the United States pursuant to a lawful admission for permanent residence at the time of the naturalization of the parent last naturalized under clause (2) or (3) of this subsection, or thereafter begins to reside permanently in the United States while under the age of 18 years.



Relevant IT systems

Individuals may use their myUSCIS online account to electronically file Form N-600. Once submitted, the Form N-600 is transferred to USCIS Electronic Immigration System (USCIS ELIS) for case processing.

Previously, the N-600 was processed and stored in CLAIMS 4. At the end of this calendar year, USCIS will begin processing the Form N-600 in USCIS ELIS. Form N-600s previously ingested into CLAIMS 4 will continue being processed in CLAIMS 4 until the form is approved/denied. All newly filed Form N-600s will solely be processed in USCIS ELIS. USCIS anticipates that USCIS ELIS will become the primary system for storing data from newly filed N-600s starting at the end of the calendar year. Form N-600 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.*

The authority to collect, store, and use the information requested on this form, and the associated evidence, is set forth in Sections 332, 341, 301, 309, 320 and repealed 321 of the Immigration and Nationality Act (INA) and Title 8 of Code of Federal Regulations (8 CFR) Parts 341, 301, 309, 320 and repealed 321.

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 <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons. <input checked="" type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors |

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 federal employees or contractors. |
| <p>c. Who will complete and submit this form? (<i>Check all that apply.</i>)</p> | <input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.). A preparer may complete the form on behalf of the applicant. <input type="checkbox"/> Business entity. <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 <input type="checkbox"/> No</p> <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> This could include a legal custodian/guardian who is not quite a legal representative, but who has no objection to the child naturalizing. An interpreter may also complete the form on behalf of the applicant. |
| <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) Provide link: https://www.uscis.gov/n-600 |
| <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-600. However, there were data elements that were not accounted for on the previous</p> | |



PTA adjudication. The list below contains a full inventory of PII collected by type of individual.

Information about the Applicant:

- Eligibility basis for filing N-600 (biological child of U.S. citizen parent or adopted child of U.S. citizen parent)
- Alien Number
- Full name
- Name exactly as it appears on Permanent Resident Card
- Other names used
- Social Security number
- USCIS Online Account Number
- Date of birth
- Country of birth
- Country of prior citizenship or nationality
- Gender
- Mailing address
- Physical address
- Current marital status
- Service in U.S. Armed Forces as a member or veteran
- Information about admission into the United States and current immigration status (port-of-entry city/town, state, date of entry, name used at time of entry, passport number, travel document number, country of issuance for passport or travel document, date of issuance for passport or travel document, current immigration status in the U.S., date and USCIS Office of lawful permanent resident status through adjustment)
- Previous application for certificate of citizenship or U.S. passport
- Permanent resident status abandonment
- Information on adoption (city/town, state, and country of adoption, date of adoption, date legal custody began, date physical custody began)
- Information on re-adoption in the U.S. (city/town, state, and country of adoption, date of adoption, date legal custody began, date physical custody began)
- Marital status of parents at the time of applicant's birth
- Marital status of parents after applicant's birth
- Residence in the U.S. in the legal and physical custody of U.S. citizen parents



- History of absences from the U.S. (date left the U.S., date of return to the U.S., city/town and state of entry upon return to the U.S.)
- Ethnicity
- Race
- Height
- Weight
- Eye color
- Hair color
- Daytime phone number
- Mobile phone number
- Email address
- Signature

Information about Applicant's U.S. citizen biological parents (or adoptive parents):

- Full name
- Date of birth
- Country of birth
- Country of citizenship or nationality
- Physical address
- Information about U.S. citizenship or naturalization status (certificate of citizenship number, A-Number, place of naturalization, city/town, state of naturalization, certificate of naturalization number, date of naturalization)
- Loss of U.S. citizenship
- Marital history (Number of times parent has been married and current marital status)
- Information about Parent's current spouse (full name, date of birth, country of birth, country of citizenship or nationality, physical address, date of marriage, city/town, state, and country of marriage, immigration status, if spouse is also biological or adopted parent)
- Dates of physical presence in the U.S.
- Information about service in U.S. Armed Forces (dates of service and type of discharge)

Information about the Interpreter:

- Full name
- Organization name



- Mailing address
- Daytime phone number
- Mobile phone number
- Email address
- Certification of fluency
- Signature

Information about the Preparer:

- Full name
- Business name
- Mailing address
- Daytime phone number
- Mobile phone number
- Email address
- Signature
- G-28 ID number

Information about the Immigration Services Officer:

- Full name
- Title
- Signature
- Recommendation

Information about the District Director or Field Office Director:

- Concurrence determination
- 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 checked="" type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) |
| <input checked="" type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number |
| <input checked="" type="checkbox"/> Visa Number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input checked="" type="checkbox"/> Passport Number | |



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|---|---|
| <input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input checked="" type="checkbox"/> Other. <i>Please list:</i> USCIS Online Account Number <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics | |
| <p>g. List the specific authority to collect SSN or these other SPII elements.</p> <p>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 applicant's identity.</p> | |
| <p>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.</p> <p>USCIS collects this SPII to identify the applicant and the person(s) transmitting citizenship. The required information assists the Immigration Services Officer in verifying identities, validating immigration history, and determining the applicant's eligibility for the benefit sought. It would be virtually impossible otherwise to demonstrate that the parent or grandparent could transmit U.S. citizenship.</p> | |
| <p>i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?</p> | <input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Individuals completing the form are notified via a Privacy Notice in the instructions for the Form N-600. <input type="checkbox"/> No. |

| 3. How will DHS store the IC/form responses? | |
|--|--|
| <p>a. How will DHS store the original, completed IC/forms?</p> | <input checked="" type="checkbox"/> Paper. Please describe. It will be stored in the applicant's A-File. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Form N-600 data will be stored in both CLAIMS 4 and USCIS ELIS. No new forms will be processed using |



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| | <p>CLAIMS 4 and forms filed prior to the end of this calendar year will continue being processed in CLAIMS 4. 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.</p> <p>The form is filed through the Lockbox and is scanned as part of the intake process. The form is then stored in USCIS ELIS (starting at the end of the calendar year).</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>When adjudicating a form in CLAIMS 4, the Immigration Services Officer may make changes, corrections, and updates to the case. He or she can also add information the applicant inadvertently omitted. Immigration Services Assistants have authority to update address information when needed.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.</p> <p>As USCIS moves toward storing new N-600 data in ELIS, these forms will be ingested at the Lockbox, 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.</p> <p>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></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.



| | |
|--|---|
| <p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p> | <p>Form N-600: DAA-0566-2016-0016 covers the adjudicative decision of Form N-600. Data is transferred to the National Archives 100 years after the individual’s date of birth.</p> <p>CLAIMS 4: DAA-0566-2017-0017 covers CLAIMS 4 records. Data is destroyed 50 years after the last completed action.</p> <p>USCIS ELIS: Pending NARA approval.</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 or transferred in accordance with the approved records 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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Data from Form N-600 is entered in USCIS systems. When the information is loaded into CLAIMS 4, it can be accessed by other USCIS offices, as well as other DHS components. Such access allows USCIS, ICE, and CBP to verify non-immigrant status in the performance of their duties.</p> <p>While the information can be accessed by other DHS components via CLAIMS 4, the form itself is not routinely shared with other DHS components. It is shared when a valid “need to know” exists.</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 type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p> | |



**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: | Amanda Hoffmaster |
| Date submitted to component Privacy Office: | April 10, 2018 |
| Date submitted to DHS Privacy Office: | June 18, 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 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> | |
| USCIS Office of Privacy recommends designating Form N-600 as a privacy sensitive form with coverage under the following: | |
| PIA <ul style="list-style-type: none"> • DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4) (and subsequent updates), which covers the processing and adjudication of Form N-600. • DHS/USCIS/PIA-056 USCIS ELIS which covers the processing and adjudication of most electronically filed Form N-600s • DHS/USCIS/PIA-071 myUSCIS Account Experience, which covers the completion and online submission of certain USCIS forms. | |
| USCIS Office of Privacy will update the ELIS and myUSCIS Account Experience Appendices and send them to PRIV for publication prior to the deployment date. | |
| 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: | 1164871 |
| Date approved by DHS Privacy Office: | July 13, 2018 |
| PTA Expiration Date | July 13, 2019 |

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. Privacy Notice required |
| PTA: | Choose an item. Click here to enter text. |



| | |
|---|--|
| PIA: | <p>PIA Appendix update required</p> <p>If covered by existing PIA, please list: DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4)</p> <p>If a PIA update is required, please list: DHS/USCIS/PIA-056 USCIS ELIS; DHS/USCIS/PIA-071 myUSCIS Account Experience</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</p> <p>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 submitting this PTA to discuss Form N-600, <i>Application for Certificate of Citizenship</i>, because USCIS plans to support the electronic filing of Form N-600 in myUSCIS. Form N-600 is used by respondents who are requesting a Certificate of Citizenship because they were born outside the United States to a U.S. citizen parent. This form is also used by applicants requesting a Certificate of Citizenship because they automatically became a citizen of the United States after birth, but before they turn 18 years of age. Form N-600 can also be filed by a parent or legal guardian on behalf of a minor child.</p> <p>USCIS uses the information collected on Form N-600 to determine if a Certificate of Citizenship can be issued to the applicant. The collected PII and SPII assists the Immigration Services Officer in verifying identities, validating immigration history, and determining the applicant’s eligibility for the benefit sought. The information on Form N-600 is supported with evidence submitted by the applicant.</p> <p>Individuals may use their myUSCIS online account to electronically file Form N-600. Once submitted, the Form N-600 is transferred to USCIS Electronic Immigration System (USCIS ELIS) for case processing. Form N-600s previously ingested into CLAIMS 4 will continue being processed in CLAIMS 4 until the form is approved/denied. All newly filed Form N-600s will solely be processed in USCIS ELIS.</p> <p>The DHS Privacy Office agrees that this is a privacy sensitive form, requiring PIA coverage. Coverage is provided by DHS/USCIS/PIA-015 Computer Linked Application Information Management System (CLAIMS 4), which covers information collected for the processing and adjudication of in-process Form N-600s. Coverage is also provided by DHS/USCIS/PIA-056 USCIS ELIS, which covers the processing and adjudication of the Form N-600s that will be filed (mostly electronically), and by DHS/USCIS/PIA-071 myUSCIS Account Experience, which covers the online submission of N-600. However, an appendix update is required for both of the latter PIAs to account for this form.</p> | |



Homeland Security

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SORN coverage is also required, and is provided by DHS/USCIS-001 A-File, which covers immigration files, and DHS/USCIS-007 Benefits Information System, which covers non-A-file content.