



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-1041 and G-1041A		
Form Title:	Genealogy Index Search Request (G-1041) and Genealogy Records Request (G-1041A).		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Genealogy Program

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Form G-1041, Genealogy Index Search Request Form G-1041A, Genealogy Records Request		
OMB Control Number:	1615-0096	OMB Expiration Date:	May 31, 2019
Collection status:	Extension	Date of last PTA (if applicable):	June 3, 2015

PROJECT OR PROGRAM MANAGER

Name:	Donna R. Ring		
Office:	Genealogy Program	Title:	Section Chief
Phone:	816-350-5572	Email:	Donna.r.ring@uscis.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT



Name:	Evadne J. Hagigal		
Office:	Click here to enter text.	Title:	Management and Program Analyst
Phone:	(202) 272-0993	Email:	Evadne.J.Hagigal@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.

2019 Extension

USCIS is submitting this PTA to extend the use of Form G-1041 and G-1041A under the Paperwork Reduction Act. There has not been any change to the form. The current form approval is set to expire on May 31, 2019.

Form G-1041, Genealogy Index Search Request and Form G-1041A, Genealogy Records Request

The USCIS Genealogy Program provides access to historical immigration and naturalization records of deceased immigrants to family historians and other researchers through two fee-based services:

1. Index Search: Form G-1041, *Genealogy Index Search Request* is used to request a search of USCIS historical databases. Request for searches of these databases are used to determine whether any records pertaining to a subject exists, and, if such records exist, to collect record citations (i.e., USCIS file numbers). The fee for an index search is \$65.00
2. Record Copy Request: Form G-1041A, *Genealogy Records Request* is used to obtain copies of USCIS historical records. Researchers with valid record citations, gained through the index search (Form G-1041) or through independent research, may request microfilm and/or paper-based copies of genealogy records. The fee for a record copy request is \$65.00 per record requested.

This form can be filled out and submitted to USCIS by researchers seeking records of their ancestry for genealogical or family history purposes; historians or social



scientists seeking historical records of persons that can be identified by name, date of birth and place of birth; or by the researcher involved by their last name.

Relevant Information Technology

The MiDAS (Microfilm Digitization Application System)

Genealogy Case Management Tracking (CMT) Subsystem is used to track the customer requests, their status, the responsive records, and the response provided. If submitted thru the lockbox, the physical form is scanned into the CMT system then the paper copy is shredded and not retained.

The Genealogy Program utilizes MiDAS to search for historical files on the record subject as a result of a 1041. As it pertains to G-1041A, Genealogy Program uses RAILS to confirm file location and CIS (Central Index System) and ARCIS (Archives and Records Information System) to request files out of retirement. The historical files are stored at the Federal Records Center (FRC) and File Control Offices (FCOs).

- 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.*

8 U.S. Code 1356

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 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 type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <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> Subjects in the files being requested are deceased. Anyone can request their information. USCIS reviews and applies FOIA Privacy exemptions to 3 rd parties information that we do not have proof of death or consent for.
<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 type="checkbox"/> Online web form. (available and submitted via the internet) Provide link: https://genealogy.uscis.dhs.gov/
<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>Form G-1041</p>	



Information about the requester:

- Full name
- Address
- Contact information
- Signature

Information about the subject of the request:

- Full name
- Aliases
- Date of birth
- Country of birth
- Proof of death (if immigrant is less than 100 years of age)
- Date of entry into the United States (Optional)
- Address of residence in the United States (optional)

Form G-1041A

Information about the requester:

- Full name
- Address
- Contact information

Information about the subject of the request:

- Full name
- Aliases
- Date of birth
- Country of birth
- Type of file requested
- File number associated with the request
- A-number
- Visa file
- C-File
- Naturalization certificate number
- AR-2 files
- Date of entry into the United States

In addition, USCIS requires a filing fee to be submitted for both forms. Payment for the forms can be accomplished electronically through pay.gov, or a cashier's check or money order. Personal checks are not accepted and are returned to the requester. USCIS destroys the original paper-based payment but maintains a copy of it for payment confirmation purposes.



<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply.</i></p>	
<p><input type="checkbox"/> Social Security number</p> <p><input checked="" type="checkbox"/> Alien Number (A-Number)</p> <p><input type="checkbox"/> Tax Identification Number</p> <p><input type="checkbox"/> Visa Number</p> <p><input type="checkbox"/> Passport Number</p> <p><input type="checkbox"/> Bank Account, Credit Card, or other financial account number</p> <p>X Other. <i>Please list following file numbers: Visa, Registry Number, AR-2 and A file as well as C file. USCIS does not keep or track SSN.</i></p>	<p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</p> <p><input type="checkbox"/> Social Media Handle/ID</p> <p><input type="checkbox"/> Known Traveler Number</p> <p><input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)</p> <p><input type="checkbox"/> Driver's License Number</p> <p><input type="checkbox"/> Biometrics</p>
<p>g. List the specific authority to collect SSN or these other SPII elements.</p> <p>8 U.S. Code 1356</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 needs the identifying information to locate information on the subject of record for Index Searches or for Record Requests in our Index Searching database MiDAS.</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>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Click here to enter text.</p> <p><input type="checkbox"/> No.</p>

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



<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. When the request is submitted on line, CMT/MiDAS as well as FIPS – Genealogy Processing system and FOIA record processing system.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. We scan the paper request into the case entered into CMT/MiDAS system when submitted on paper then the paper is shredded.</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. For paper requests mailed to the lockbox, we manually enter the information into CMT to create a case and keep a copy of the request with the case and shred the paper copy.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. When a requestor submits the request on line, a case is automatically created and they enter the information into the form lines.</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. The requests are searched by last name (requester and subject of the request) or case number created for the specific request.</p> <p><input checked="" 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.



	The non-personal identifier will be the case/control number created for each request.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	Information contained in the DISR module of MiDAS is retained and disposed of in accordance with the schedule approved by the National Archives and Records Administration (“NARA”) the week of March 13, 2006 (N1-566-06).
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	We follow the records retention schedule and work with the product owner of CMT/MiDAS, Lynda Spencer.
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 type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.	
<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.	
<input checked="" 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.



**Homeland
Security**

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



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Maisonobe G. Fokwa Kengne
Date submitted to component Privacy Office:	December 21, 2018
Date submitted to DHS Privacy Office:	January 28, 2019
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>The USCIS Office of Privacy recommends to designate Form G-1041/1041A privacy sensitive with coverage under the following compliance documentations:</p> <p>PIA: DHS/USCIS-017(a) Microfilm Digitization Application System (MiDAS), which covers the processing of information in MiDAS.</p> <p>SORN: DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, which covers the collection and use of information maintained in A-files.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jamie Huang
PCTS Workflow Number:	1173842
Date approved by DHS Privacy Office:	January 30, 2019
PTA Expiration Date	January 30, 2022

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. Existing Privacy Notice is sufficient
PTA:	No system PTA required. Click here to enter text.



PIA:	<p>System covered by existing PIA If covered by existing PIA, please list: DHS/USCIS-017(a) Microfilm Digitization Application System (MiDAS) 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 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 extend the use of Forms G-1041 and G-1041A under the Paperwork Reduction Act. The current forms are set to expire on May 31, 2019. Form G-1041 is the Genealogy Index Search Request, and Form G-1041A is the Genealogy Records Request document. The USCIS Genealogy Program provides access to historical immigration and naturalization records of deceased immigrants to family historians and other researchers.</p> <p>The DHS Privacy Office finds that is a privacy sensitive form and a PIA is required because both forms collect PII from members of the public regarding historical immigrant records for genealogical and research purposes. PRIV agrees with USCIS Privacy that the DHS/USCIS-017(a) Microfilm Digitization Application System (MiDAS) covers members of the public requesting immigration records for research purposes.</p> <p>PRIV finds that a SORN is required for the forms because information is retrieved by a unique identifier in MiDAS. PRIV agrees with USCIS Privacy that DHS/USCIS/ICE/CBP-001 covers the collection and use of information maintained in A-files.</p> <p>PRIV also finds that a PAS is required to be included with this form informing individuals how their information will be used and shared, noting that information listed in Form G-1041 and G-1041A is retrievable by the requestor’s name and other identifiers.</p>	