



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: **Form I-485**

Form Title: ***Application to Register Permanent Residence or Adjust Status***

Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Field Operations Directorate(FOD)
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IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: *Form I-485, Application to Register Permanent Residence or Adjust Status*

OMB Control Number:	OMB No. 1615-0023	OMB Expiration Date:	June 30, 2019
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Collection status:	Revision	Date of last PTA (if applicable):	May 19, 2016
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PROJECT OR PROGRAM MANAGER

Name: David P. Johnson

Office:	Field Operations	Title:	Adjudications Officer
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Phone:	202-699-1514	Email:	david.p.johnson@uscis.dhs.gov
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name: Evadne Hagigal



Office:	Office of Policy & Strategy	Title:	Project Manager
Phone:	202-272-0993	Email:	Evadne.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.

2018 Revision

USCIS is updating Form I-485 to clarify reasons for the application and provide more detailed instructions. USCIS is standardizing the Biometric Services appointment language on forms that already request the collection of biometrics. The Form I-485 already included the Biometric service appointment language, but is now being revised. The Immigration Biometric and Background Check SORN is added as coverage.

Form I-485, Application to Register Permanent Residence or Adjust Status

The Immigration and Nationality Act (INA) permits a foreign national to obtain a green card (permanent residence) while in the United States if the individual was inspected and admitted or paroled into the United States, is able to meet all eligibility requirements for a green card in a particular category, and is not otherwise barred from adjustment. The common term for this process is “adjustment of status.”

The INA provides a foreign national two primary paths to permanent resident status.

1. Adjustment of status – the process by which an eligible individual already in the United States can get a green card without having to return to their home country to complete visa processing, or
2. Consular processing —the process for an individual outside the United States (or who is in the United States but is ineligible to adjust status) to obtain a visa abroad and enter the United States as a permanent resident. (This pathway is referred to as “consular processing.”)



Form I-485 is used by a person who is in the United States to apply to USCIS to adjust to permanent resident status or to register for permanent residence.

Relevant Information Technology

The Interim Case Management Solution (ICMS) and Computer Linked Application Information Management System (CLAIMS 3) are the IT systems associated with Form. I-485. The Form I-485 and all supplemental documents related to the form are stored in the 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 103, 245, and 264(f) of the Immigration and Nationality Act

2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII ¹)?	☒ Yes ☐ No
b. From which type(s) of individuals does this form collect information? (Check all that apply.)	☒ Members of the public ☐ U.S. citizens or lawful permanent residents ☒ Non-U.S. Persons. ☐ DHS Employees ☐ DHS Contractors ☐ Other federal employees or contractors.
c. Who will complete and submit this form? (Check all that apply.)	☒ The record subject of the form (e.g., the individual applicant).

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.



	☒ Legal Representative (preparer, attorney, etc.). ☐ Business entity. If a business entity, is the only information collected business contact information? ☐ Yes ☐ No ☐ Law enforcement. ☐ DHS employee or contractor. ☐ Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.
d. How do individuals complete the form? <i>Check all that apply.</i>	☒ Paper. ☒ Electronic. (ex: fillable PDF) ☐ Online web form. (available and submitted via the internet) <i>Provide link:</i>
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>	
Form I-485 collects information about the applicant, interpreter, and preparer. Information collected about the Applicant includes: • Full name • Alias(es) • Mailing Address • Date of Birth • Country of Birth • Country of Citizenship/Nationality • U.S. Social Security Number	



- A-Number
- USCIS Online Account Number
- Passport or Travel Document Number
- Passport or Travel Document Expiration Date
- Country that Issued Passport or Travel Document
- Place and Date of Late Arrival
- I-94 Number
- Immigration Status of Last Arrival
- Current USCIS Status
- Status Expiration Date
- Address History for Last Five Years
- Parents' Full Names
- Parents' Date of Birth
- Parents' Sex
- Parents' Place of Birth
- Parents' Current Town and Country of Residence
- Marital Status
- Spouse's Full Name
- Spouse's Date of Birth
- Date and Place of Marriage to Current Spouse
- Spouse's Place of Birth
- Marital History
- Children's Full Names
- Children's A-Numbers
- Children's Dates of Birth
- Children's Country(ies) of Birth
- Height
- Weight
- Ethnicity
- Race
- Eye Color
- Hair Color
- Employment History for Last Five Years
- Entry/Exit History
- Nonimmigrant Visa Number
- Present and Past Memberships or Affiliations



- Criminal History
- Disability(ies) and/or Impairment(s) Accommodations
- Phone Number
- Email Address
- Signature

Information collected about the Preparer includes:

- Full Name
- Business or Organization Name
- Address
- Email Address
- Phone Number
- Signature

Information collected about the Interpreter includes:

- Full Name
- Language Used
- Business or Organization Name
- Address
- Email Address
- Phone Number
- Signature

Information collected about Attorney or Accredited Representative include:

- Whether a G-28 was completed (yes/no)
- Volag Number
- Attorney State Bar Number(s)
- USCIS Online Account Number

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.*

- | | |
|---|--|
| ☒ Social Security number | ☐ DHS Electronic Data Interchange |
| ☒ Alien Number (A-Number) | Personal Identifier (EDIPI) |
| ☐ Tax Identification Number | ☐ Social Media Handle/ID |
| ☐ Visa Number | ☐ Known Traveler Number |



☒ Passport Number ☐ Bank Account, Credit Card, or other financial account number ☐ Other. <i>Please list:</i>	☐ Trusted Traveler Number (Global Entry, Pre-Check, etc.) ☐ Driver's License Number ☐ Biometrics
g. List the specific authority to collect SSN or these other SPII elements. Sections 103, 245, and 264(f) of the Immigration and Nationality Act	
h. How will this information be used? What is the purpose of the collection? Describe why this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program. The social security number may be used to verify the applicant. The SSN is used when investigating potential fraud or criminal issues in various records and systems, as it is a unique identifier, just as are fingerprints. For young men between the ages of 17 and 9 months up to their 26th birthday, USCIS sends that information (name, DOB, SSN) along to the Selective Service (SS) for their registration. Without the SSN, the SS cannot provide on-line evidence of registration. If a young man only lists a name, DOB, and address but no SSN on his I-485, then the only way to later get proof of Selective Service registration is by manual inquiry, and the individual must remember the address that was listed on his I-485 or the SS will be unable to pull that information from their records.	
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>)?	☒ Yes. Please describe how notice is provided. A Privacy Notice is included in the corresponding form instruction. ☐ No.

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

a. How will DHS store the original, completed IC/forms?	☒ Paper. Please describe. Alien File ☒ Electronic. Please describe the IT system that will store the data from the form. CLAIMS 3 and ICMS
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	☒ Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. EDMS
b. If electronic, how does DHS input the responses into the IT system?	☒ Manually (data elements manually entered). Please describe. Some information is submitted manually by employees with Lockbox. The Lockbox uses both, with the first step being an automatic scan to capture recognizable information. Then, for fields that we have designated for additional verification, Lockbox contract staff are manually reviewing, verifying, and correcting, if needed. ☒ Automatically. Please describe. Initial Automatic scan to capture recognizable information.
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	☒ 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. Records may be retrieved a personal identifier or a combination of personal identifiers such as name and date of birth and A number ☐ By a non-personal identifier. <i>Please describe.</i> Click here to enter text.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	DAA-0566-2016-0018 covers Form I-485. DAA-0566-2016-0009 covers CLAIMS 3 records. Data is destroyed 50 years after the last completed action. ICMS is a non-record system. ICMS is a non-record system.

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.



	N1-566-08-11 covers A-Files records which were deemed permanent. USCIS transfers A-Files 100 years after the individual's date of birth.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	The system owner is responsible for ensuring the records are deleted in accordance with the approved records retention schedule.
f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i>	
☐ Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.	
☐ 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.	
☒ No. Information on this form is not shared outside of the collecting office.	



Please include a copy of the referenced form and Privacy Act Statement (if applicable) with this PTA upon submission.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Nina Robinson
Date submitted to component Privacy Office:	November 2, 2018
Date submitted to DHS Privacy Office:	November 2, 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>)	☒ Yes. Please include it with this PTA submission. ☐ No. Please describe why not. Click here to enter text.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
The Office of Privacy recommendation is to designate Form I-485 as privacy sensitive with coverage under DHS/PIA/USCIS-016(a) CLAIMS 3 and Associated Systems, DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefits Information System, and DHS/USCIS-018 Immigration Biometric and Background Check (IBBC) System of Records.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Hannah Burgess
PCTS Workflow Number:	1171122
Date approved by DHS Privacy Office:	November 14, 2018
PTA Expiration Date	November 14, 2021

DESIGNATION

Privacy Sensitive IC or Form:	Yes If "no" PTA adjudication is complete.
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ DHS Policy for Computer-Readable Extracts Containing SPII applies. ☒ Privacy Act Statement required. ☒ Privacy Impact Assessment (PIA) required. ☒ System of Records Notice (SORN) required. ☐ Specialized training required. ☐ 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:	System covered by existing PIA If covered by existing PIA, please list: DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems If a PIA update is required, please list: Click here to enter text.
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556; DHS/USCIS-007 Benefits Information System October 19, 2016 81 FR 72069; DHS/USCIS-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.
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
USCIS is submitting this PTA to discuss updates to the instructions and standardize language on Form I-485. Form I-485 is used by a person who is in the United States to apply to USCIS to adjust to permanent resident status or to register for permanent residence. The form already included biometric service appointment language, but it is being revised and standardized. The DHS Privacy Office agrees with USCIS Privacy that Form I-485 is a privacy sensitive information collection that requires PIA coverage because it collects PII from members of the public. PRIV finds that DHS/USCIS/016(a) CLAIMS 3 provides adequate coverage as it assesses the risks surrounding CLAIMS 3, which is the central database where the I-485 is collected, stored, used, and maintained. SORN coverage is necessary for Form I-485 because it collects information that is retrieved by a unique identifier. DHS/USCIS/ICE/CBP-001 A-File SORN covers the information collected on the Form I-485 because information collected by the form is maintained in the individual's A-File as they pass through the immigration process. DHS/USCIS-007 Benefits Information System (BIS) SORN supports the electronic processing of immigration benefits in CLAIMS 3 that may not be stored in the A-File. DHS/USCIS-018 Immigration Biometric and Background Check has also been added as additional coverage.	