



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:	I-765 and I-765WS		
Form Title:	<i>Application for Employment Authorization and Worksheet</i>		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Service Center Operations

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Form I-765, <i>Application for Employment Authorization</i> and Form I-765WS, <i>Worksheet</i>		
OMB Control Number:	1615-0040	OMB Expiration Date:	May 31, 2020
Collection status:	Revision	Date of last PTA (if applicable):	June 1, 2020

PROJECT OR PROGRAM MANAGER

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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Melanie Frank
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Office:	Office of Policy and Strategy	Title:	PRA Clearance Officer
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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.

2021 Revision

USCIS is submitting this updated PTA to document the electronic ingestion of the Form I-765 via myUSCIS Account Experience, a customer service tool that provides an online public-facing portal for USCIS customers to access information related to their applications, petitions, and service requests will now be available. The electronic ingestion of the Form I-765 will support the following eligibility categories which will be processed in USCIS Electronic Immigration System (USCIS ELIS):

- c(3)(A): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Pre-Completion OPT
- c(3)(B): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Post-Completion OPT
- c(3)(C): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)

Form I-765, Application for Employment Authorization

Aliens who are temporarily in the United States and eligible for employment authorization or authorized to be employed incident to their status may file a Form I-765, Application for Employment Authorization, to request an Employment Authorization Document (EAD).

I-765 Worksheet (WS)



An EAD based on a grant of deferred action requires a showing of economic necessity. To facilitate this economic necessity review, a separate worksheet (Form I-765WS) was created. There is a general presumption that Deferred Action for Childhood Arrivals (DACA) requestors will need to work given their undocumented circumstances and the fact that they are not generally anticipated to have independent means. Absent evidence of sufficient independent financial resources, the Form I-765WS is sufficient to establish economic need without any further economic analysis. Additionally, the agency decided that all deferred action I-765 applicants must complete the I-765WS after it was determined to create the I-765WS for DACA. The Form I-765WS includes a certification section so that individuals can sign the form.

Fee Rule

The Fee final rule adjusts certain immigration and naturalization benefit request fees charged by USCIS. It also makes changes related to setting, collecting, and administering fees. Fee schedule adjustments are necessary to recover the full operating costs associated with administering the nation's immigration benefits system, safeguarding its integrity, and efficiently and fairly adjudicating immigration benefit requests, while protecting Americans, securing the homeland, and honoring our country's values. This final rule also makes certain adjustments to fee waiver eligibility, filing requirements for nonimmigrant workers, premium processing service, and other administrative requirements. Form I-765/I-765WS and the instructions were previously revised as a result of the Fee Rule¹. The Fee Rule PTA was adjudicated on March 27, 2020.

Relevant IT systems

Individuals may submit the Form I-765 package by paper or electronically. Online filing for the Form I-765 is available via myUSCIS, a customer service tool that provides an online public-facing portal for USCIS customers to access information related to their applications, petitions, and service requests. Individuals may use their myUSCIS online account to electronically file Form I-765. Currently online filing will support the following eligibility categories that will be processed in USCIS ELIS:

- c(3)(A): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Pre-Completion OPT
- c(3)(B): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Post-Completion OPT
- c(3)(C): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics)

¹ USCIS conducted a comprehensive biennial fee review and determined that current fees do not recover full cost. This final rule adjusts certain immigration and naturalization benefit request fees charged by USCIS.



Once submitted, the Form I-765 is transferred to the respective IT system for case processing. USCIS uses the following systems to process Form I-765.

- Computer Linked Adjudication Information Management System (CLAIMS 3): For the majority of the populations of individuals who can file Form I-765, USCIS uses the CLAIMS 3 system to process requests for employment authorization.
- USCIS ELIS: For some populations of aliens who file Form I-765, USCIS uses the USCIS ELIS system to process requests for employment authorization.
- GLOBAL: Approved asylum applicants have an I-765 for employment authorization completed via a data exchange between GLOBAL and CLAIMS3. When an affirmative asylum application is approved by an asylum office, GLOBAL initiates the EAD production so that information is stored in GLOBAL and CLAIMS3. After a person has asylum status and needs an extension or replacement EAD, they file an I-765, which is entered into CLAIMS 3.

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.C. 1324a; 8 CFR 274a.12 and 274a.13

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information" (PII ²)?	<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 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 <input type="checkbox"/> Other federal employees or contractors.

² 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>c. Who will complete and submit this form? (<i>Check all that apply.</i>)</p>	<p><input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant).</p> <p><input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.).</p> <p><input type="checkbox"/> Business entity.</p> <p style="padding-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="padding-left: 80px;"><input type="checkbox"/> Yes</p> <p style="padding-left: 80px;"><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i></p> <p>Click here to enter text.</p>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link: myUSCIS Online Account</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>Form I-765, <i>Application for Employment Authorization</i> collects information from the applicant and preparer.</p> <p><i>Information about the applicant includes:</i></p> <ul style="list-style-type: none"> • First Name • Middle Name • Last Name • U.S Addresses (Physical and Mailing/Safe Mailing Address) • Telephone Number(s) • E-mail address • Alias(es) 	



- Country of Citizenship/Nationality
- Place and date of Birth
- Gender
- Marital Status
- Social Security number (SSN), if any
- SSA Enumeration Beyond Entry questions:
 - Do you want SSA to issue you a Social Security card? (Yes/No)
 - SSA Consent for Disclosure (Yes/No)
 - Father's Name (Family Name, Given Name)
 - Mother's Name (Family Name, Given Name)
- USCIS Online Account Number (if any)
- Alien Number (if any)
- I-94 Number
- Passport Number
- Travel Document Number
- Country of Issuance for Passport or Travel Document
- Expiration Date for Passport or Travel Document
- Date of Last Arrival into the United States
- Place of Last Arrival into the United States
- Immigration Status of Last Arrival
- Current Immigration Status
- Student Exchange Visitor Information System (SEVIS) Number (if any)
- Eligibility Category
- If (c)(3)(C), Degree
- If (c)(3)(C), Employer's Name as listed in E-Verify
- If (c)(3)(C), Employee's E-Verify Company ID or Client ID
- If (c)(26), receipt number of H-1B spouse's most recent Form I-129
- If (c)(8), yes/no arrest and/or conviction question
- If (c)(35) or (c)(36), receipt number of your Form I-140 or your spouse's/parent's Form I-140
 - If (c)(35) or (c)(36), yes/no arrest and/or conviction question
 - If (c)(9), Immigrant Category
- Statement and Certification
- Signature
- Date of Signature

Interpreter information includes:



- Full Name
- Business or Organization Name (if any)
- Mailing Address
- Daytime Telephone Number
- Mobile Telephone Number
- Email Address (if any)
- Certification
- Signature
- Date of Signature

Preparer (including Accredited Representative and Attorney) information includes:

- Full Name
- Business or Organization Name (if any)
- Mailing Address
- Daytime Telephone Number
- Mobile Telephone Number (if any)
- Email Address (if any)
- Statement and Certification
- Signature
- Date of Signature

Form I-765 Worksheet collects the following information:

- Current Annual Income
- Current Annual Expenses
- Current Value of Assess
- Additional Information

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 checked="" type="checkbox"/> Passport Number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |



<input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input checked="" type="checkbox"/> Other. <i>Please list: USCIS Online Account Number and SEVIS Number</i>		<input type="checkbox"/> Driver's License Number <input checked="" 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)), states, "Alien's social security account number. – Notwithstanding any other provision of law, the Attorney General is authorized to require any alien to provide the alien's social security account number for purposes of inclusion in any record of the alien maintained by the Attorney General or the Service."</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 the applicant's SSN on Form I-765, Application for an Employment Authorization Document, in accordance with the Paperwork Reduction Act and the Immigration and Nationality Act. The collection of the applicant's SSN is very important in the context of an Application for Employment Authorization Document (EAD) for a number of reasons. First, the EAD evidences that an individual is authorized for employment, and in the United States the SSN is the primary number associated with employment records, tax collection, and lawful employment.</p> <p>The USCIS E-Verify program uses the SSN to interface immigration records and Social Security Administration databases. Without SSNs, we lose the integrity of this interface. The SSN provided on the application for an EAD can be used to determine whether an applicant has worked previously in the U.S. and if that employment was lawful.</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. USCIS provides a Privacy Notice to the individual on the form instructions prior to collecting any information. <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>	<p><input checked="" type="checkbox"/> Paper. Please describe. The form will be stored in the receipt file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Computer Linked Adjudication Information Management System (CLAIMS 3): For the majority of the populations of individuals who complete Form I-765, it will be entered into CLAIMS 3.</p> <p>USCIS Electronic Immigration System (USCIS ELIS): For some populations of individuals who complete Form I-765, it will be entered into USCIS ELIS.</p> <p>GLOBAL: Approved asylum applicants have an I-765 for employment authorization completed via a data exchange between GLOBAL and CLAIMS3. When an affirmative asylum application is approved by an asylum office, GLOBAL initiates the EAD production so that information is stored in GLOBAL and CLAIMS3. After a person has asylum status and needs an extension or replacement EAD, they file an I-765, which is entered into CLAIMS 3.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Form I-765 may also be scanned using the Enterprise Document Management System (EDMS).</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 those I-765s direct filed at a Service Center, data entry clerks manually enter data from the form into CLAIMS 3.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe.</p>



	<p>For those I-765s filed through a Lockbox, the form, fee and support documents are scanned and the data is populated using Optical Character Reader technology. The data is then verified and corrected, if needed, by keying clerks via OnBase (JPMorgan data collection system). The data (scanned and keyed) is sent USCIS (scanned is stored in EDMS, keyed is stored in CLAIMS 3 or ELIS depending on form type).</p> <p>Individuals may use their myUSCIS online account to electronically file Form I-765. The information is transferred to ELIS for processing.</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.³ <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Receipt number, USCIS Online Account Number, SSN, A-Number, Name, Date of Birth, or a combination of the 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 I-765: Destroy 7 years from the expiration of the authorized employment period. [DAA-0566-2016-0005-0001]</p> <p>CLAIMS 3: CLAIMS 3 deletes and destroys records 50 years from the date of the last completed action [DAA-0566-2016-0009 and DAA-0566-2016-0013]</p> <p>USCIS/EDMS: Records are retained permanently. [EDMS: N1-566-08-17]</p>

³ 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>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 the 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. The information from the form may be shared to other ICE and CBP via system access.</p> <p><input checked="" 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. USCIS will share Form I-765 information with SSA to produce a Social Security number for the applicant, if consent is provided.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	



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:	Shannon DiMartino
Date submitted to component Privacy Office:	December 9, 2020
Date submitted to DHS Privacy Office:	February 11, 2021
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.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
<p>USCIS is submitting this updated PTA to document the electronic ingestion of the Form I-765/I-765WS via myUSCIS Account Experience. Currently online filing will support the following eligibility categories that will be processed in USCIS ELIS:</p> <ul style="list-style-type: none"> • c(3)(A): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Pre-Completion OPT • c(3)(B): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - Post-Completion OPT • c(3)(C): F-1 Student Seeking Optional Practical Training (OPT) in a Position Directly Related to Major Area of Study - 24-Month Extension for STEM Students (Students With a Degree in Science, Technology, Engineering, or Mathematics) <p>The USCIS Office of Privacy recommendation is to designate as privacy sensitive, requiring PIA and SORN coverage. Coverage can be found under the following:</p> <p><u>PIAs</u></p> <ul style="list-style-type: none"> • DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems, which covers the collection of information collected on the I-765 and stored in CLAIMS 3 	



- DHS/USCIS/PIA-056 USCIS ELIS, which covers the filing of the Form I-765 using USCIS ELIS
- DHS/USCIS/PIA-061 Benefit Request Intake Process, which covers the benefit intake and processing of the Form I-765
- DHS/USCIS/PIA-071 myUSCIS Account Experience, which covers the completion and online submission of certain USCIS forms.

SORNs

- DHS/USCIS/ICE/CBP-001-Alien File, Index, and National File Tracking System of Records, which covers the use, collection, and storage of applicant information in the A-File.
- DHS/USCIS-007 Benefits Information System, which covers the use, collection, and storage of benefit requester and representative information



PRIVACY THRESHOLD ADJUDICATION (TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Jennifer Kimmons
Date approved by DHS Privacy Office:	Max Binstock
Date approved by DHS Privacy Office:	February 12, 2021
PTA Expiration Date	February 12, 2024

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:	DHS PRIV has not received this ICR/Form.
Date IC/Form Approved by PRIV:	Click here to enter a date.
Privacy Act Statement:	e(3) statement update is required. SORNs listed in the Privacy Notice need citations
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; DHS/USCIS/PIA-056 USCIS ELIS; DHS/USCIS/PIA-061 Benefit Request Intake Process; and DHS/USCIS/PIA-071 myUSCIS Account Experience
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 10, 2019, 84 FR 54622
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCIS is submitting this updated PTA to discuss an update to the Form I-765 and I-765WS which will now be electronically ingested via myUSCIS Account Experience, a customer service tool that provides an online public-facing portal for USCIS customers to access information related to their applications, petitions, and service requests will now be available. The electronic ingestion of the Form I-765 will support additional F-1 eligibility categories which will be processed in USCIS Electronic Immigration System (USCIS ELIS).</p> <p>The DHS Privacy Office (PRIV) finds that this form is a privacy sensitive information collection requiring PIA coverage because PII is collected from members of the public. PRIV agrees with USCIS Privacy that PIA coverage is provided by DHS/USCIS-016(a) CLAIMS 3 & DHS/USCIS/PIA-056 ELIS, which cover the storage and processing of forms I-765 and I-765WS data elements in their systems. PIA coverage is also provided by DHS/USCIS/PIA-061 Benefit Request Intake Process, which covers the benefit intake and processing of the Form I-765 and DHS/USCIS/PIA-071 myUSCIS Account Experience, which covers the completion and online submission of this USCIS form.</p> <p>PRIV finds that SORN coverage is required because information is retrieved by unique identifier. Coverage is provided by DHS/USCIS/ICE/CBP-001 Alien File, which covers the collection, use, and maintenance of PII to facilitate administration of benefits and enforcement of provisions under the INA and related immigration statutes. Coverage is also provided by DHS/USCIS-007 BIS SORN, which covers the use of PII in intake, processing, and decisional data that may not interact with the A-file.</p> <p>A Privacy Notice was also submitted with this PTA. The Privacy Notice should be updated to include the proper citations for the A-FILE SORN and BIS SORN.</p>	