



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-333		
Form Title:	Obligor Change of Address		
Component:	Immigration and Customs Enforcement (ICE)	Office:	ERO

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Obligor Change of Address		
OMB Control Number:	1653-0042	OMB Expiration Date:	July 31, 2017
Collection status:	Extension	Date of last PTA (if applicable):	Not applicable

PROJECT OR PROGRAM MANAGER

Name:	Justin Gellert		
Office:	ERO	Title:	Detention and Deportation Officer
Phone:	202-732-5462	Email:	Justin.C.Gellert@ice.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Scott Elmore		
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Office:	OCIO	Title:	ICE Forms Manager
Phone:	202-732-2601	Email:	Scott.a.elmore@ice.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.

This form is submitted by bond obligors who need to inform ICE of a new mailing address. ICE needs to maintain current obligor address information so that it can communicate with the obligor, and make payments of interest and principal owed to the obligor.

As described below in Question 2e, this form includes bond obligor and alien information such as the name, physical address, and phone number. Obligor can submit this form in person, and upon presentation, a signed copy will be returned to the obligor indicating receipt of the address change. Obligor can also submit the form by mail to the appropriate ERO field office where the bond was posted.

- 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 Immigration and Nationality Act, as amended (8 U.S.C. 1103, 1183, 1226, 1229c, and 1363) authorizes the collection of this information to provide for the posting, maintenance, cancellation, and breach of an immigration surety bond, and/or associated financial management activities.

2. Describe the IC/Form



<p>a. Does this form collect any Personally Identifiable Information” (PII¹)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>b. From which type(s) of individuals does this form collect information? (Check all that apply.)</p>	<p><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 <input type="checkbox"/> Other federal employees or contractors.</p>
<p>c. Who will complete and submit this form? (Check all that apply.)</p>	<p><input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <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 type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. Please describe. Click here to enter text.</p>
<p>d. How do individuals complete the form? Check all that apply.</p>	<p><input checked="" type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i></p>

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.



e. What information will DHS collect on the form? *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.*

From the bond obligor: Name, physical address, telephone number. The obligor will also supply the name, physical address, and telephone number of the alien for whom the bond was posted. Finally, this form collects the Alien File (A-File) number and bond receipt number.

From DHS Employees: Name, job title, and signature of the official receiving the form.

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

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

8 U.S.C. 1103 and 1360 authorize collection of the A-number.

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.

ICE collects the A-number ("file number" on the form) to make sure that the form is placed into the appropriate alien's file.

- | | |
|---|--|
| i. Are individuals provided notice at the time of collection by | <input checked="" type="checkbox"/> Yes. Please describe how notice is provided.
The record subject him/herself fills out the form. |
| | <input type="checkbox"/> No. |



DHS (<i>Does the records subject have notice of the collection or is form filled out by third party</i>)?	
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3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input checked="" type="checkbox"/> Paper. Please describe. A copy will be placed into the A-File. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Electronic A-File <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Scanned forms are maintained both in EARM and the BMIS SharePoint site.
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. If the A-File is digitized, then a copy is sent to the National Records Center (NRC), who would then place the form within the digitized file. <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<input checked="" type="checkbox"/> By a unique identifier. ² Please describe. If information is retrieved by personal identifier, please submit a Privacy Notice with this PTA. Information is typically retrieved by either the name of the obligor or alien. <input type="checkbox"/> By a non-personal identifier. Please describe. Click here to enter text.

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.



d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	Form I-333 falls under Records Retention Schedule N1-566-08-11, which covers Alien Files. These files are kept permanently after transfer to the National Archives and Records Administration (NARA).
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	Not applicable. These are permanent records that are not destroyed.
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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	Jordan Holz
Date submitted to component Privacy Office:	August 3, 2017
Date submitted to DHS Privacy Office:	Click here to enter a date.
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>	
ICE Form I-333 "Obligor Change of Address" is covered under the DHS/ICE/PIA - 005 Bond Management Information System (BMIS) PIA. This PIA states that if obligors need to correct their address, there is a form that is issued by ERO for that purpose.	
This form has SORN coverage under the DHS/ICE 004 - Bond Management Information System (BMIS).	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1148670
Date approved by DHS Privacy Office:	August 22, 2017
PTA Expiration Date	August 22, 2020

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 approved this ICR/Form.
Date IC/Form Approved by PRIV:	August 22, 2017
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	e(3) statement update is required. Please change the Privacy Statement to the Privacy Notice
PTA:	New system PTA required. BMIS PTA expires 9/18/18
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/ICE/PIA-005 Bond Management Information System (BMIS) 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/ICE-004 Bond Management Information System (BMIS), February 15, 2011, 76 FR 8761 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>ICE Privacy is submitting this PTA because Form I-333 Obligor Change of Address is submitted by bond obligors who need to inform ICE of a new mailing address. ICE needs to maintain current obligor address information so that it can communicate with the obligor, and make payments of interest and principal owed to the obligor. This form includes bond obligor and alien information such as the name, physical address, and phone number.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because ICE Privacy collects information from members of the public including United States Citizens, Lawful Permanent Residents, individuals whose records are covered by the Judicial Redress Act, and ICE employees. PRIV agrees with ICE Privacy that the BMIS PIA covers ICE’s need to support the financial management of immigration bonds posted for the release of aliens in ICE custody.</p> <p>PRIV finds that a SORN is required because Form I-333 retrieves information by a unique identifier. PRIV agrees with ICE Privacy that the BMIS SORN provides coverage. DHS/ICE-004 covers the maintenance of records related to the administration and financial management operations of ICE's immigration bond program.</p> <p>PRIV finds that a Privacy Notice is required because Form I-333 collects PII directly from United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act.</p>	