



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-102		
Form Title:	Application for Replacement/Initial Nonimmigrant Arrival-Departure Document		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Service Center Operations (SCOP)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Form I-102, <i>Application for Replacement/Initial Nonimmigrant Arrival-Departure Document</i>		
OMB Control Number:	OMB No. 1615-0079	OMB Expiration Date:	October 31, 2017
Collection status:	Extension	Date of last PTA (if applicable):	July 11, 2013

PROJECT OR PROGRAM MANAGER

Name:	Rakhee Patel		
Office:	SAFE	Title:	Adjudications Officer
Phone:	202-272-8472	Email:	rakhee.d.patel@uscis.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kerstin Jager		
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Office:	Regulatory Coordination Division	Title:	Project Manager
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.

Form Extension

Form I-102, *Application for Replacement/Initial Nonimmigrant Arrival Departure Document* will expire on October 31, 2017. USCIS is submitting the Form I-102 PTA because the form is expiring, and will be extended with minor updates to include updating standard form language and USCIS online account number field.

The updated Form I-102 includes the USCIS Online Account Number field for collecting this information if USCIS previously issued this number to the alien. USCIS uses the USCIS Online Account Number to enhance customer service and the quality of our processes. Form I-102 will be added to USCIS ELIS and available for e-filing at a later date.

Form I-102, Application for Replacement/Initial Nonimmigrant Arrival-Departure

Form I-102, *Application for Replacement/Initial Nonimmigrant Arrival-Departure Document* is used to file to USCIS for the following circumstances :

1. To replace a lost or stolen Form I-94;
2. To replace a mutilated Form I-94; or
3. A Form I-94 was not issued when an alien entered the United States as nonimmigrant.

Relevant Information Technology

The Computer Linked Application Information System (CLAIMS 3) assists in processing Form I-102. The information in CLAIMS 3 is used for the adjudication and/or granting or denial of immigration benefits. CLAIMS 3 enables USCIS to efficiently process and adjudicate cases by tracking each case through all aspects of the immigration and citizenship process, from application submission to close-out. The physical form and



supplemental evidence is stored in the A-File and may be electronically scanned into EDMS.

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 information in this form is set forth in the Immigration and Nationality Act, 8 U.S.C. §§ 1103, 1201, 1303, 1304, 1305, and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).

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? <i>(Check all that apply.)</i>	<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.
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input checked="" 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.

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"/> DHS employee or contractor. <input type="checkbox"/> 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>	<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) <i>Provide link:</i> This form is not currently available for e-filing. The electronic fillable PDF version can be found here: https://www.uscis.gov/i-102
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>	

Information collected about the principal applicant include:

- Full Name
- U.S. Mailing Address
- U.S. Physical Address
- Date of Birth
- Country of Birth
- Country of Citizenship/Nationality
- A-Number
- USCIS Online Account Number
- Social Security Number (if applicable)
- Current Nonimmigrant status
- Date Nonimmigrant Status Expires
- Date of Last Entry into the United States
- Place of Last Entry into the United States
- I-94/I-94W/I-95 Arrival/Departure document number
- Passport Number
- Travel Document Number
- Country of Issuance for Passport or Travel Document
- Expiration Date for Passport or Travel Document
- Reason for application



- Processing information
- Class of Admission at Last Entry into the United States
- Place of Last Entry into the United States (City and State)
- Signature
- Daytime Phone Number
- Mobile Telephone Number
- Email Address date

Information collected about the interpreter includes:

- Full name
- Business or Organization Name
- Mailing address
- Day Telephone number
- Email Address
- Language fluency
- Signature
- Date of Signature
- **Information collected about the preparer includes:** Daytime Telephone Number
- Fax Number
- Email Address
- Accredited Representative
- Full Name
- Business or Organization Name
- Signature and Declaration
- Date of Signature
- Mailing Address

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



<input checked="" type="checkbox"/> Other. <i>Please list:</i> Travel Document 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.</p> <p>The authority to collect other SPII elements in this form is set forth in the Immigration and Nationality Act, 8 U.S.C. §§ 1103, 1201, 1303, 1304, 1305, and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).</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 SSN to facilitate and expedite the adjudication of the applicant's request for a Form I-102 replacement arrival departure record. The SSN information is used to establish and corroborate the applicant's identity.</p> <p>The SSN information collected within the Form I-102 application is also used to assist DHS in enforcing the immigration laws of the United States by providing timely and accurate information about persons who are subject to those laws. USCIS personnel conduct background security checks on applicants for the purpose of determining whether the applicant has established eligibility for the benefit requested. Because the I-102 is typically a non-interview, paper-based adjudication, the SSN is especially useful and provides significant information to verify an applicant's identity and his/her claim to eligibility, providing a critical tool for more accurate and appropriate adjudication determinations for USCIS and the applicant.</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. Form I-102 instructions contain a USCIS Privacy Act Statement</p> <p><input type="checkbox"/> No.</p>



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. Form I-102 is stored in an A-File <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. CLAIMS 3 <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Electronic Database Management System
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Information from forms typed into CLAIMS 3. <input type="checkbox"/> Automatically. Please describe. N/A
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 <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. A-number, Receipt Number, Name and Date of Birth <input type="checkbox"/> 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>	Form I-102: N1-85-90-04 A-File: N1-566-08-11 CLAIMS3: DAA-0566-2016-0009
e. How do you ensure that records are disposed of or deleted in accordance with	Program office following the records retention schedule for filing and destruction of records.

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 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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.	
<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. N/A	
<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:	Nina Robinson
Date submitted to component Privacy Office:	May 1, 2017
Date submitted to DHS Privacy Office:	May 17, 2017
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.
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 USCIS Office of Privacy recommendation is to designate Form I-102 as privacy sensitive with coverage under the following privacy compliance documentation :	
PIA	
<ul style="list-style-type: none"> DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program, which covers the digitization and storage of forms in the Enterprise Document Management System DHS/USCIS/PIA-016 Computer Lined Application Information Management System (CLAIMS 3) and Associated Systems, which covers the processing and adjudication of Form I-102. 	
SORN	
<ul style="list-style-type: none"> DHS/USCIS-001 Alien File, Index, and National File Tracking System of Records which covers the collection, use, and storage of the Form I-102 in the A-file DHS/USCIS-007 Benefits Information system, which covers the collection, use and storage of data elements USCIS collects from the applicants, preparers, and interpreters 	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1143055
Date approved by DHS Privacy Office:	May 17, 2017
PTA Expiration Date	May 17, 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:	May 17, 2017
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	New e(3) statement is required. A new Privacy Notice is required
PTA:	New system PTA required.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/USCIS/PIA-003(b) Integrated Digitization Document Management Program; DHS/USCIS/PIA-016(a) Computer Lined Application Information Management System (CLAIMS 3) and Associated Systems



	If a PIA update is required, please list: Click here to enter text.
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, November 21, 2013, 78 FR 69864; 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:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS Privacy is submitting this PTA because the Form I-102 PTA is expiring, and will be extended with minor updates to include updating standard form language and USCIS online account number field. The updated Form I-102 includes the USCIS Online Account Number field for collecting this information if USCIS previously issued this number to the alien. USCIS uses the USCIS Online Account Number to enhance customer service and the quality of our processes. Form I-102 will be added to USCIS ELIS and available for e-filing at a later date.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because Form I-102 collects PII from non US persons. PRIV agrees with USCIS Privacy recommendation that the IDDMP PIA and CLAIMS 3 PIA provide coverage. DHS/USCIS/PIA-003(b) covers the digitization and storage of forms in the Enterprise Document Management System. DHS/USCIS/PIA-016(a) covers the processing and adjudication of Form I-102.</p> <p>PRIV finds that is a SORN is required because Form I-102 retrieves information by a unique identifier. PRIV agrees with USCIS Privacy that the A-File SORN and BIS SORN provides coverage. DHS/USCIS/ICE/CBP-001 covers the collection, use, and storage of the Form I-102 in the A-File. DHS/USCIS-007 covers the collection, use and storage of data elements USCIS collects from the applicants, preparers, and interpreters.</p> <p>PRIV finds that a Privacy Notice is required to inform the individual about the authority to collect the information requested, purposes for collecting it, routine uses, and consequences of providing or declining to provide the information to USCIS.</p> <p>Please submit a new Form I-102 PTA prior to it being added to USCIS ELIS.</p>	