



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-17		
Form Title:	Petition For Approval of School for Attendance by Nonimmigrant Student		
Component:	Immigration and Customs Enforcement (ICE)	Office:	Student and Exchange Visitor Program (SEVP)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Petition For Approval of School for Attendance by Nonimmigrant Student		
OMB Control Number:	1653-0038	OMB Expiration Date:	March 31, 2018
Collection status:	Revision	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

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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.

DHS Form I-17, "Petition for Approval of School for Attendance by Nonimmigrant Student," OMB Control No. 1653-0038, is used by the Student and Exchange Visitor Program (SEVP) as part of the school certification process. SEVP certification allows institutions to issue Forms I-20, "Certificate of Eligibility for Nonimmigrant Student Status," to prospective international students after admitting them for a course of study. Prospective international students then use the Form I-20 to apply for a visa to enter the United States. SEVP certification also authorizes the institution to enroll these international students after they enter the United States on an F or M student visa. SEVP certification is the result of an adjudication process that includes a review of the Form I-17 application, submission of supporting documentation, payment of the application fee, site visits, research and federal adjudication.

Schools use the Student and Exchange Visitor Information System (SEVIS) to petition for initial SEVP certification to enroll nonimmigrant students by completing the Form I-17. Any updates to the Form I-17 or petitions for recertification (editing the Form I-17) are also completed via SEVIS.

Form I-17 is being reviewed and revised.

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.*

1. Approval of schools for enrollment of F and M nonimmigrant, 8 C.F.R Section 214.3 (2008)
2. Withdrawal of school approval, 8 C.F.R Section 214.4 (2008)

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 |
|---|--|

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.



<p>b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> Members of the public</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</p> <p style="padding-left: 20px;"><input type="checkbox"/> Non-U.S. Persons.</p> <p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input type="checkbox"/> Other federal employees or contractors.</p>
<p>c. Who will complete and submit this form? <i>(Check all that apply.)</i></p>	<p><input 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 checked="" 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 checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject.</p> <ol style="list-style-type: none"> 1. Individuals with signatory authority on behalf of the school; and 2. Primary Designated School Official for the school
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input type="checkbox"/> Paper.</p> <p><input 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:</i></p> <p>Only accessible via SEVIS</p>



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.*

Below are links that outline all the information collected under Form I-17 via SEVIS.

- <https://studyinthestates.dhs.gov/sevis-help-hub/school-records/school-certification>
- <https://studyinthestates.dhs.gov/sevis-help-hub/school-records/school-certification/initial-certification>
- <https://studyinthestates.dhs.gov/sevis-help-hub/school-records/school-certification/form-i-17-petition-update>

PII collected:

- Private School Owner Name (school owner is contacted as a last resort when unable to get response from the primary designated school official)
- Private School Owner Address
- School Official Name
- School Official Title
- School Official Address
- School Official Telephone Number
- School Official Email address
- School Official status – U.S. Citizen or Legal Permanent Resident (LPR)

See *Appendix B* for screenshots of the PII collected under Form I-17 via SEVIS.

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



g. List the specific authority to collect SSN or these other SPII elements.	
N/A	
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.	
N/A	
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>)?	<input type="checkbox"/> Yes. Please describe how notice is provided. Click here to enter text. <input checked="" type="checkbox"/> No. Notice may not be provided to all parties whose PII is collected via the form. However, the individual completing the form would have notice that his/her information is being collected.

3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input type="checkbox"/> Paper. Please describe. Click here to enter text. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. The information collected will be stored and maintained in the Student and Exchange Visitor Information System (SEVIS). <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.
b. If electronic, how does DHS input the responses into the IT system?	<input type="checkbox"/> Manually (data elements manually entered). Please describe. Click here to enter text. <input checked="" type="checkbox"/> Automatically. Please describe.



	The information collected occurs directly and automatically through the SEVIS interface.
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. <p>Although retrieval is primarily done on the school name or school code, it is possible that school owner name could be used to retrieve information related to retrieve multiple schools owned by a single individual. This would be done for investigative purposes.</p> <p>See <i>Appendix A</i> for a copy of the Privacy Statement.</p> <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> School name, school code, SEVIS ID for school
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	The SEVIS records retention schedule is in draft. Until the schedule is approved by NARA, SEVIS records are maintained permanently.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	See above.
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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.	

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.



For investigative purposes, information may be shared to such offices as ICE/HSI Counterterrorism and Criminal Exploitation Unit (CTCEU).

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

For investigative purposes, information may be shared to external agencies per SORN routine uses or other Privacy Act exemptions.

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:	Michelle Escobar
Date submitted to component Privacy Office:	November 3, 2017
Date submitted to DHS Privacy Office:	December 8, 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. Third party is providing information related to school and its officials.
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 Privacy recommends that the PTA is sufficient at this time. The information collected by the Form I-17 is covered under DHS/ICE/PIA-001 Student and Exchange and Visitor Information System (SEVIS) PIA and the DHS/ICE-001 SEVIS SORN.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1154892
Date approved by DHS Privacy Office:	December 18, 2017
PTA Expiration Date	December 18, 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 commented on this ICR/Form.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	New e(3) statement is required. e(3) statement found in PIA Appendix is approved
PTA:	Updated system PTA required. SEVIS Information Sharing module PTA submitted and approved with this PTA.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/ICE/PIA-001 Student And Exchange Visitor Information System (SEVIS)</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list: DHS/ICE 001 Student and Exchange Visitor Information System, January 5, 2010, 75 FR 412</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>ICE Privacy is submitting this PTA because DHS Form I-17 is used by SEVP as part of the school certification process. SEVP certification is the result of an adjudication process that includes a review of the Form I-17 application, submission of supporting documentation, payment of the application fee, site visits, research and federal adjudication. Form I-17 collects Private School Owner name and address, school officials name, title, address, telephone number, and email address, and school official status – whether or not U.S. Citizen or LPR.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because the Form I-17 collects PII from members of the public. PRIV agrees with ICE Privacy that the SEVIS PIA provides coverage. DHS/ICE/PIA-001 discusses the privacy risks associated with submitting the Form I-17 for initial certification, recertification, and update petitions, as well as appeals.</p> <p>PRIV finds that a SORN is required because Form I-17 retrieves information by a unique identifier. PRIV agrees with ICE Privacy that DHS/ICE-001 SEVIS SORN covers the collection of SEVIS data.</p> <p>PRIV finds that an e(3) statement is required because it is DHS policy is to provide a Privacy Act Statement to all persons asked to provide personal information about themselves. PRIV approves the e(3) statement in the Appendix.</p>	



Appendix A – Privacy Statement

SEVIS – School Certification & Recertification

Form I-17: Petition for Approval of School for Attendance by Nonimmigrant Student

Privacy Statement

Authority: U.S. Immigration and Customs Enforcement (ICE) Student and Exchange Visitor Program (SEVP) is authorized to collect information by Section 641 of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996 (codified at 8 U.S.C. 1372), Public Law 104-208; Public Law 107-56, U.S.A. PATRIOT Act; Homeland Security Presidential Directive-2 (HSPD 2, Combating Terrorism Through Immigration Policies), as amended by HSPD-5, Management of Domestic Incidents, Compilation of HSPDs); 8 CFR 214.2(f); 8 CFR 214.2(m); 8 CFR 214.3; and 8 CFR 214.4.

Purpose: Your information collected through the ICE Student and Exchange Visitor Information System (SEVIS) is used to either nominate you as a designated school official (DSO), certify that you as a DSO are familiar with relevant regulations of admission and maintenance of status for F and M students and school certification, and affirm your compliance with these regulations, including the requirement to update and maintain school records and nonimmigrant student records in SEVIS. If you are a private school owner, your information is also collected for contact purposes by SEVP when the primary DSO is unavailable. SEVP uses your information to review and certify a school's certification or recertification in order to participate in the Student and Exchange Visitor Program.

Agency Disclosure of Information: Your information may be shared internally within the DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for audit, enforcement, investigatory, litigation, or other purposes permitted by law and policy. This disclosure is in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the DHS/ICE-001 Student and Exchange Visitor Information System (SEVIS) System of Records, which can be viewed at www.dhs.gov/privacy.

For private school owners who are not currently a United States Citizen or Lawful Permanent Resident, your information may be shared internally within the U.S. Department of Homeland Security (DHS), as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for audit, enforcement, investigatory, litigation, or other purposes permitted by law and policy.

Providing Information to DHS: The information you provide is voluntary. However, failure to provide the information requested may lead to a withdrawal of approval of your school's certification or a denial of your school's recertification of eligibility to participate in the Student and Exchange Visitor Program.



Appendix B – PII Collected

Private School Owner Information:

- **1.8 School Type** – Click the radio button that best describes your school:

1.8 School Type * ⏸ ⓘ

- Private, for profit
- Private, non-profit
- Public

- School type refers to the general nature of school ownership:
 - **Private, for profit** – Your school is privately owned and operated for profit.
 - **Private, non-profit** – Your school is privately owned and is classified as a non-profit organization.
 - **Public** – Your school is not privately owned.
- If your school is privately owned, SEVIS displays two additional fields to collect information about the owner.
- **Note:** Publicly owned schools will not see these additional fields.

1.8 School Type * ⏸ ⓘ

- Private, for profit
- Private, non-profit
- Public

1.9 Private School Owner * ⏸ ⓘ

1.10 Owner's Address *

Add Address

Screenshots and instructions to complete the Form I-17 via SEVIS are available at https://studyinthestates.dhs.gov/sevis-help-hub/school-records/school-certification/form-i-17-initial-certification#prepare_the_petition



School Official Information:

Add New Official

Click the **Add a New Official** button to add someone to the petition, who is not currently an active school official elsewhere. The *Add Official* modal opens.

Petition for School Certification (Form I-17)

Add Official

Required fields are marked with an asterisk (*)

Last Name * **First Name *** **Suffix**

The official is: * UNITED STATES CITIZEN LEGAL PERMANENT RESIDENT

Title *

Address *

Email Address *

Telephone Number *
() - ext.

Assign Role * Assign the official to a DSO role for at least one Campus. A new official cannot assigned to the PDSO role.

Add Official to Campus	
CAMPUS	DSO
The SEVIS School	<input type="checkbox"/>
The SEVIS School - Arlington	<input type="checkbox"/>