



## 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](mailto: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.

<b>Form Number:</b>	<b>ICE Form I-352</b>		
<b>Form Title:</b>	<b>Immigration Bond</b>		
Component:	Immigration and Customs Enforcement (ICE)	Office:	<b>Enforcement and Removal Operations (ERO)</b>

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

<b>Collection Title:</b>	<b>Immigration Bond</b>		
OMB Control Number:	OMB No. 1653-0022	OMB Expiration Date:	December 31, 2019
Collection status:	Revision	Date of last PTA (if applicable):	<b>September 19, 2017</b>

#### PROJECT OR PROGRAM MANAGER

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#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT



Name:	Scott Elmore		
Office:	ICE OCIO	Title:	ICE Forms Manager
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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.*

The data collected on Form I-352 "Immigration Bond" is being updated to allow ERO to accept Maintenance of Status and Departure (MS&D) bonds. Because non-immigrants required to post MS&D bonds do not have A-Numbers, the revised form will collect the visa number instead of the Alien Registration Number (A-Number) for MS&D bonds. No other personally identifiable information (PII) changes will be made to this form.

An immigration bond is posted as security for performance and fulfillment of the bonded alien's obligations to the Government. The data collected on Form I-352 "Immigration Bond" is used by ICE to ensure that the person or company posting the bond is aware of the duties and responsibilities associated with the bond. By completing this form, the bond obligor (either an individual or a surety company) provides a formal, written guarantee as security for the amount of the bond, thereby assuring DHS that all of the conditions of the bond will be fulfilled.

This form collects information about the bond obligor, the alien for whom the bond is furnished, DHS employees, and individuals who pledge bonds, notes, or cash. The complete list of data elements collected on this form can be found in the answer to Question 2e (below). Members of the public (i.e., bond obligors) complete and sign Form I-352 in person at a local ERO field office. Surety agents log into the electronic Bonds Online System (eBONDS) to complete and submit the I-352 to ERO.

- 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 information on this form. The Internal Revenue Code (26 U.S.C. 6109) and Executive Order 9397 authorize the collection of the Social Security number (SSN). 8 U.S.C. 1103 and 1360 authorize collection of the Alien Registration Number (A-number), or Visa Number.

2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<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 <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</li> <li><input checked="" type="checkbox"/> Non-U.S. Persons.</li> </ul> <input checked="" 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? (Check all that apply.)	<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 checked="" type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor.

<sup>1</sup> 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 checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> Names and signatures of individuals who pledge bonds, notes, or cash.
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> <a href="https://ebonds.ice.gov/ebonds/welcome.do">https://ebonds.ice.gov/ebonds/welcome.do</a>
<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><b>Information about the obligor:</b> Name, physical address, phone number, signature, power of attorney number, and Taxpayer Identification Number (TIN). If the obligor is a sole proprietor, the TIN might be an individual's SSN. For cash bonds, the obligor's SSN is collected to pay interest through the U.S. Treasury Department and to comply with Internal Revenue Service requirements to report interest payments.</p> <p><b>Information about the surety agent:</b> Name of Agent, physical address, telephone number, power of attorney number.</p> <p><b>Information about the surety company:</b> Company name, physical address, phone number, TIN. If the surety company is a sole proprietor, the TIN might be an individual's SSN.</p> <p><b>Information about the alien for whom the bond is posted:</b> Name, alien registration number (A-number) or Visa number, bond receipt number, current location, date and country of birth, nationality, date, port and means of arrival in the United States, address where alien is to reside, and telephone number at alien's residence.</p> <p><b>Information about DHS employee:</b> Field Office Director Name and signature.</p>	



<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply.</i></p>	
<input type="checkbox"/> Social Security number <input checked="" type="checkbox"/> Alien Number (A-Number) <input checked="" type="checkbox"/> Tax Identification Number <input checked="" type="checkbox"/> Visa Number <input type="checkbox"/> Passport Number <input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input type="checkbox"/> Other. <i>Please list:</i>	<input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) <input type="checkbox"/> Social Media Handle/ID <input type="checkbox"/> Known Traveler Number <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics
<p>g. List the <b>specific authority</b> to collect SSN or these other SPII elements.</p> <p>The Internal Revenue Code (26 U.S.C. 6109) and Executive Order 9397 authorizes the collection of the SSN. 31 U.S.C. 7701(c)(1) authorizes the collection of the TIN. 8 U.S.C. 1103 and 1360 authorize collection of the Alien Registration Number (A-number) or Visa Number.</p>	
<p>h. How will this information be used? What is the purpose of the collection? Describe <b>why</b> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.</p> <p>For cash bonds, the obligor's SSN is necessary to pay interest through the U.S. Treasury Department and to comply with Internal Revenue Service requirements to report interest payments. The obligor's, surety agent's, or surety company's SSN (in the case of a sole proprietor) or TIN will also be used for the purposes of collecting and reporting information on any delinquent accounts arising out of the individual's relationship with the Government.</p> <p>ICE must collect the A-number as a means to properly identify the alien for whom the bond is being posted. ICE will not have A-Numbers for nonimmigrants who post MS&amp;D</p>	



bonds. Therefore, ICE will be collecting the visa number from aliens who will be required to post MS&D bonds.

i. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of the collection or is form filled out by third party*)?

Yes. Please describe how notice is provided.

[Click here to enter text.](#)

No.

Bond obligors and surety agents have notice of the collection because they are the individuals supplying the information on the form.

Additionally, notice is provided by the privacy notice that is on the form, and by the following ICE privacy compliance documentation:

#### ICE PIAs

- DHS/ICE/PIA-005(a) Bond Management Information System 2009
- DHS/ICE/PIA-005 Bond Management Information System 2008
- DHS/ICE-PIA-015(b) Enforcement Integrated Database (EID) ENFORCE Alien Removal Module (EARM 3.0)
- DHS/ICE/PIA-008 eBonds Online System

#### ICE SORNs

- DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records (A-FILE SORN)
- DHS/ICE-004 Bond Management Information System of Records Notice (SORN)



	<ul style="list-style-type: none"> <li>DHS / ICE 011 – Criminal Arrest Records and Immigration Enforcement Records (CARIER)</li> </ul>
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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. Forms are stored electronically in the ENFORCE Allen Removal Module (EARM), Bond Management Information System – Web (BMIS Web), eBONDS, and the eBONDS SharePoint document repository. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Forms are not scanned
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Same data elements noted in Question No. 2(e) <input checked="" type="checkbox"/> Automatically. Please describe. Two system-to-system interfaces provide data to EID in support of the electronic processing of immigration bonds. The first is an interface with ICE’s Electronic Bond Online System (eBONDS) and the second is with ICE’s Bond Management Information System/Web Version (BMIS Web).
c. How would a user search the information submitted on the	<input checked="" type="checkbox"/> By a unique identifier. <sup>2</sup> Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.

<sup>2</sup> 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.





forms, <i>i.e.</i> , how is the information retrieved?	A-number, or Visa Number; Name, and bond receipt number <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> <a href="#">Click here to enter text.</a>
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	Form I-352 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?	The ERO Bond Management Unit (BMU) takes mandatory ICE Records Training and follows ICE Records Guidance ensuring that I-352 forms are disposed of in accordance with the applicable retention schedules.
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><input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. This information will be used by and disclosed to U.S. Citizenship and Immigration Services and U.S. Customs and Border Protection or to other DHS personnel and contractors who need the information to support the enforcement of immigration laws and the provision of immigration benefits.</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. DHS may share this information with the U.S. Treasury Department to report interest paid to an obligor, and to facilitate payments to or collection of monies owed by an obligor. DHS may also share this information with the U.S. Justice Department and other Federal and State agencies for collection, enforcement, investigatory, or litigation purposes, or as otherwise authorized pursuant to the relevant System of Records Notice (SORN).</p> <p>For MS&amp;D bonds, DHS may share information about the posting of a bond on behalf of a non-immigrant with the Department of State so that the Department of State can complete issuance of a visa to the non-immigrant.</p>	



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:	<b>Kevin Mullinix</b>
Date submitted to component Privacy Office:	<b>August 12, 2019</b>
Date submitted to DHS Privacy Office:	August 14, 2019
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. <a href="#">Click here to enter text.</a>
<p>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>	
<p>This updated ICE Form 352, Immigration Bond PTA is being submitted for review. Because this form collects information from the surety agent, or company on behalf of the bonded alien, a Privacy Act notice is required. ICE Form 352, Immigration Bond, has coverage under the following PIAs and SORNs:</p> <ul style="list-style-type: none"> <li>• DHS/ICE/PIA-005(a) Bond Management Information System 2009</li> <li>• DHS/ICE/PIA-005 Bond Management Information System 2008</li> <li>• DHS/ICE-PIA-015(b) EID EARM 3.0</li> <li>• DHS/ICE/PIA-008 eBonds Online System</li> <li>• DHS/ICE-004 Bond Management Information SORN</li> <li>• DHS/ICE 011 – CARRIER SORN</li> <li>• DHS/USCIS/ICE/CBP-001 - Alien File, Index, and National File Tracking System of Records (A-FILE SORN)</li> </ul>	



## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	<b>Hannah Burgess</b>
PCTS Workflow Number:	<b>1184356</b>
Date approved by DHS Privacy Office:	August 23, 2019
PTA Expiration Date	August 23, 2022

### DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If “no” PTA adjudication is complete.</b>
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:	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. Statement submitted and approved
PTA:	Choose an item. Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: DHS/ICE/PIA-005 Bond Management Information System and update; DHS/ICE-PIA-015(b) EID EARM 3.0; DHS/ICE/PIA-008 eBonds Online System If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
<p>SORN:</p>	<p><b>System covered by existing SORN</b> If covered by existing SORN, please list: DHS/ICE-004 Bond Management Information System (BMIS) February 15, 2011 76 FR 8761; DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER) System of Records October 19, 2016, 81 FR 72080 If a SORN update is required, please list: <a href="#">Click here to enter text.</a></p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>ICE is submitting this updated PTA to discuss Form I-352, Immigration Bond, to document that the form will now allow ERO to accept Maintenance of Status and Departure (MS&amp;D) bonds. Because non-immigrants required to post these bonds do not have A-Numbers, the revised form now collects visa numbers as an alternative identifier. No other PII changes were made to the form.</p> <p>By completing Form I-352, the bond obligor (either an individual or a surety company) provides a formal, written guarantee as security for the amount of the bond, thereby assuring DHS that all of the conditions of the bond will be fulfilled. In addition to A-Number and visa number, the form collects information about the bond obligor, the alien for whom the bond is furnished, DHS employees, and individuals who pledge bonds, notes, or cash. Forms are stored electronically in EARM, BMIS Web, eBONDS, and the eBONDS SharePoint document repository.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because Form I-352 Immigration Bond collects PII from members of the public. PRIV agrees with ICE Privacy that coverage is provided by DHS/ICE/PIA-005 Bond Management Information System and the subsequent update, which discuss the lifecycle of immigration bonds. Coverage is also provided by DHS/ICE-PIA-015(b) EID EARM 3.0, which discusses the interfaces that provide data to EID in support of the electronic processing of immigration bonds and DHS/ICE/PIA-008 eBonds Online System, which covers the electronic Form I-352.</p> <p>PRIV finds that a SORN is required because Form I-352 retrieves information by unique identifier. PRIV agrees with ICE Privacy that coverage is provided by DHS/ICE-004 Bond Management Information SORN, which covers records related to the administration and financial management operations of ICE's immigration bond program. Coverage is also provided by DHS/ICE-011 CARIER SORN, which covers records collected to support the grant or denial of parole, and tracking of individuals who seek or receive parole into the United States, and DHS/USCIS/ICE/CBP-001 Alien File, which covers information collected as part of an individual's A-File.</p>	