



## 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>I-212</b>		
<b>Form Title:</b>	<b>Application for Permission to Reapply for Admission into the United States After Deportation or Removal</b>		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office:</b>	Service Center Operations (SCOPS)

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

<b>Collection Title:</b>	<b>Click here to enter text.</b>		
<b>OMB Control Number:</b>	1615-0018	<b>OMB Expiration Date:</b>	June 30, 2017
<b>Collection status:</b>	Revision	<b>Date of last PTA (if applicable):</b>	Click here to enter a date.

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Angela Lyons		
<b>Office:</b>	SCOPS	<b>Title:</b>	Adjudications Officer
<b>Phone:</b>	202.272.1585	<b>Email:</b>	angela.r.lyons@uscis.dhs.gov

v

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT



Name:	Heather Young		
Office:	Office of Policy and Strategy	Title:	Project Manager
Phone:	202.272.1556	Email:	heather.l.young@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.*

The Form I-212, Application for Permission to Reapply for Admission into the United States After Deportation or Removal (OMB No. 1615-0018) expires March 31, 2017 and is scheduled to undergo an Information Collection Revision. The form and instructions are scheduled for non-substantive plain language updates to include Standard Language required by Office of Management and Budget (OMB). USCIS continues to use the USCIS ELIS Account Number to verify whether the applicant has an existing USCIS ELIS account.

An alien who is inadmissible under section 212(a)(9)(A) or (C) of the Immigration and Nationality Act (INA) files Form I-212 to obtain "consent to reapply for admission" that is required before the alien can lawfully return to the United States. "Consent to reapply" is also called "permission to reapply."

#### Relevant Information Technology

USCIS processes completed Form I- 212 in ICMS at the field offices and through CLAIMS 3 at the service centers. The application is stored in the A-file.

Form I-212 will also be processed by the USCIS Electronic Immigration System (USCIS ELIS).

Changes made to the document since the last adjudication are:

Added:

- 1) Family Members as a Category of Individuals under 2E
  - o Family Full Name, Relationship, Date of Birth, Physical Address



## 2) Add Cell Phone Number for Interpreter and Form Preparer

Removed:

- 1) Facsimile from Form Preparer

- 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.*

### *I-212, Application for Permission to Reapply for Admission Into the United States After Deportation or Removal*

An alien who is inadmissible under section 212(a)(9)(A) or (C) of the Immigration and Nationality Act (INA) files Form I-212 to obtain "consent to reapply for admission" that is required before the alien can lawfully return to the United States. "Consent to reapply" is also called "permission to reapply."

## 2) Describe the IC/Form

- |  |   |
|--|---|
| a. Does this form collect any Personally Identifiable Information" (PII <sup>1</sup> )?          | <input checked="" type="checkbox"/> Yes<br><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<br><input type="checkbox"/> U.S. citizens or lawful permanent residents<br><input type="checkbox"/> Non-U.S. Persons.<br><input type="checkbox"/> DHS Employees<br><input type="checkbox"/> DHS Contractors<br><input type="checkbox"/> Other federal employees or contractors. |

<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.



<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 <b>that is NOT the record subject.</b> <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 type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</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>For the Applicant, the I-212 is collects full name, A-number, date and country of birth, nationality/citizenship, details regarding the applicant’s removal, inadmissibility, departures and re-entry, alias names and dates of birth, separate physical and mailing address, USCIS ELIS account number, SSN, DOS Consular Case number, location and date of visa interview, gender, race, height, weight, eye color, hair color, phone number, cell number and email address, information about any I-601 being filed (date, receipt, office), and signature.</p> <p>Family members, family full name, relationship, date of birth, physical address</p> <p>For Interpreters, the I-212 asks for full name, organization name, mailing address, phone number, cell phone, and signature.</p>	



For Preparers, the I-212 asks for full name, organization, mailing address, phone, cell phone, email address, and signature.

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 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"/> Biometrics (signature)                           |
| <input type="checkbox"/> Other. <i>Please list:</i>                                   |  |

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

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.

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.

USCIS collects the SSN to facilitate and expedite the adjudication of the applicant's request for a Form I-212 waiver. The SSN is requested in order to expedite the adjudication of the waiver application by verifying true identity of the applicant, validating the related immigration history and ensuring security by assisting to accurately match criminal information to applicants.

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-212 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>i. <b>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)?</b></p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. A Privacy Act Statement is provided on the form.</p> <p><input type="checkbox"/> No.</p>
--	--

3) How will DHS store the IC/form responses?	
<p>a. <b>How will DHS store the original, completed IC/forms?</b></p>	<p><input checked="" type="checkbox"/> Paper. Please describe. Document is stored in A-file</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.</p>
<p>b. <b>If electronic, how does DHS input the responses into the IT system?</b></p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. The information is submitted manually by employees with Lockbox.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</p>
<p>c. <b>How would a user search the information submitted on the forms, i.e., how is the</b></p>	<p><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.</p>

<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.





<b>information retrieved?</b>	Records retrieved by name, A number, date and country of Birth and Graphical User Interface (GUI) system.  <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.
d. <b>What is the records retention schedule(s)?</b> <i>Include the records schedule number.</i>	Five years. The record schedule number is N1-85-96-01.
e. <b>How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</b>	The system owner is responsible for ensuring the records are deleted in accordance with the approved records 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. Click here to enter text. <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.	
<p>Form I-212 applications filed overseas are accessible to Department of State consular officers.</p> <input 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.**





**Homeland  
Security**

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov)  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)



## PRIVACY THRESHOLD REVIEW

### (TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	<b>Kim Mott</b>
Date submitted to component Privacy Office:	<b>November 22, 2016</b>
Date submitted to DHS Privacy Office:	February 6, 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 type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. USCIS Office of Privacy developed a Privacy Act Statement and is seeking program and OCC approval.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
<p>The Form I-212, Application for Permission to Reapply for Admission into the United States After Deportation or Removal (OMB No. 1615-0018) expires March 31, 2017 and is scheduled to undergo an Information Collection Revision. The form and instructions are scheduled for non-substantive plain language updates to include Standard Language required by Office of Management and Budget (OMB). USCIS continues to use the USCIS ELIS Account Number to verify whether the applicant has an existing USCIS ELIS account.</p> <p>I-212, Application for Permission to Reapply for Admission Into the United States After Deportation or Removal</p> <p>An alien who is inadmissible under section 212(a)(9)(A) or (C) of the Immigration and Nationality Act (INA) files Form I-212 to obtain "consent to reapply for admission" that is required before the alien can lawfully return to the United States. "Consent to reapply" is also called "permission to reapply."</p> <p>Relevant Information Technology</p> <p>USCIS processes completed Form I- 212 in ICMS at the field offices and through CLAIMS 3 at the service centers. The application is stored in the A-file.</p>	



Form I-212 will also be processed by the USCIS Electronic Immigration System (USCIS ELIS).

The Office of Privacy recommends this is a privacy sensitive form and is covered under existing PIA and SORNs.

#### PIA

- DHS/USCIS/PIA – 016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems since it's processed in CLAIMS 3.
- DHS/USCIS/PIA – 056 USCIS Electronic Immigration System (USCIS ELIS). USCIS ELIS is an electronic case management system that allows USCIS to process certain immigration benefit requests.
- Forthcoming CAP Tracker PIA since this is one of the forms for this system.

#### SORN

- DHS/USCIS - 007 Benefits Information System, October 19, 2016 (81 FR 72069) which collects, uses, and maintains the Benefit Information System records to administer immigrant or nonimmigrant benefit requests.
- DHS/USCIS/ICE/CBP – 001 Alien File, Index, and National File Tracking System of Records, November 1, 2013 (78 FR 69864) since this is where the application is stored.



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

DHS Privacy Office Reviewer:	<b>Max Binstock</b>
PCTS Workflow Number:	<b>1138293</b>
Date approved by DHS Privacy Office:	February 9, 2017
PTA Expiration Date	February 9, 2018

### 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:	DHS PRIV has not received 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:	<b>New e(3) statement is required.</b> Click here to enter text.
PTA:	<b>New system PTA required.</b> Click here to enter text.
PIA:	<b>PIA Appendix update required</b> If covered by existing PIA, please list: DHS/USCIS/PIA-016(a) Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems;



	If a PIA update is required, please list: DHS/USCIS/PIA-056 USCIS ELIS; Forthcoming CAP Tracker PIA
SORN:	<p><b>System covered by existing SORN</b></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: <a href="#">Click here to enter text.</a></p>
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p><b>USCIS Privacy is submitting this PTA because Form I-212, expires March 31, 2017 and is scheduled to undergo an Information Collection Revision. The form and instructions are scheduled for non-substantive plain language updates to include Standard Language required by OMB.</b></p> <p><b>PRIV finds that is a privacy sensitive system and a PIA is required because Form I-212 collects PII from members of the public. PRIV agrees with USCIS Privacy recommendation that the CLAIMS 3 PIA provides coverage. Form I-212 is processed in CLAIMS 3. PRIV finds that an Appendix update is required to the USCIS ELIS PIA to include the processing of Form I-212. PRIV also agrees with USCIS Privacy that the forthcoming CAP Tracker PIA must include discussion of Form I-212. In its current draft, there are no references to the form.</b></p> <p><b>PRIV finds that a SORN is required because Form I-212 retrieves information by a unique identifier. PRIV agrees with USCIS Privacy that the A-File SORN and BIS SORN provide adequate coverage. DHS/USCIS/ICE/CBP-001 covers the paper and electronic copy A-File and/or Receipt File, supplemental forms, supplemental evidence, and identity history summaries (formally known as RAP sheets), but does not include all case processing and decisional data. DHS/USCIS-007 covers USCIS' collection, use, maintenance, dissemination, and storage of benefit request information, including case processing and decisional data not included in the A-file.</b></p> <p><b>PRIV finds that a PAS is also required on Form I-212.</b></p> <p><b>This PTA will expire in one year.</b></p>	