



## 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.

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<b>Form Number:</b>	<b>I-352 SA, I-352 RA</b>		
<b>Form Title:</b>	<b>eBONDS Access Application and Agreement, eBONDS Rules of Behavior Agreement</b>		
Component:	Immigration and Customs Enforcement (ICE)	Office:	Click here to enter text.

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

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<b>Collection Title:</b>	<b>Electronic Bonds Online (eBONDS) Access</b>		
OMB Control Number:	1653-0046	OMB Expiration Date:	June 30, 2019
Collection status:	Extension	Date of last PTA (if applicable):	Click here to enter a date.

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#### PROJECT OR PROGRAM MANAGER

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Name:	Carl Albritton		
Office:	ERO	Title:	Management and Program Analyst
Phone:	(202) 732-5918	Email:	Management and Program Analyst

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## COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Scott Elmore		
Office:	OCIO	Title:	ICE Forms & PRA Coordinator
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.*

The data collected on the Electronic Bonds Online (eBONDS) Access Application and Agreement (I-352-SA), and eBONDS Rules of Behavior Agreement (I-352-RA) enable U.S. Immigration and Customs Enforcement (ICE) to determine whether to grant surety companies access privileges to eBONDS, an information system administered by ICE, and to maintain accurate records about the surety companies and their agents that have been granted access to eBONDS. Surety companies who access eBONDS are required to register with ICE and acknowledge in writing that they will only use eBONDS for those purposes related to surety bonds (e.g., posting surety bonds, retrieving bond-related notifications, responding to requests for information from ICE, etc.); create, manage, and terminate surety agent user accounts in accordance with ICE policy; notify ICE in the event that they suspect or experience a security breach that impacts eBONDS; and follow guidance issued by ICE on the proper handling of personal information.

The I-352-RA collects information about the surety president, and agent authorized as an attorney-in-fact. The complete list of data elements collected on this form can be found in the answer to Question 2e (below). Members of the public (surety president, and agent authorized as an attorney-in-fact) complete and sign I-352-RA. The surety president or agent authorized as an attorney-in fact submits the Form I-352-RA via regular mail, or regular mail, commercial courier, to: ICE/ERO/BMU, 500 12th Street, SW, Washington, DC 20536.

The I-352-SA collects information about the Surety company, surety president, surety agent, administrator(s) for the surety or agency, corporate secretary. The complete list



of data elements collected on this form can be found in the answer to Question 2e (below). Members of the public (Surety President, Surety Agent, Administrator(s) for the Surety or Agency, Corporate Secretary) complete and sign I-352-SA in the presence of a notary. Surety President, Surety Agent, Administrator(s) for the Surety or Agency, or Corporate Secretary submits the Form I-352-RA via regular mail, or regular mail, commercial courier, to: ICE/Enforcement and Removal Operations (ERO)/Bonds Management Unit (BMU), 500 12th Street, SW, Washington, DC 20536.

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.*

8 U.S.C. §§ 1103, 1183, 1226, 1229c, and 1363; and 31 U.S.C. § 7701

## 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? <i>(Check all that apply.)</i>	<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 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 checked="" type="checkbox"/> Business entity.

<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>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" 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><a href="#">Click here to enter text.</a></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><b><u>I-352-SA:</u></b></p> <p><b>Information about the Surety Company:</b></p> <p>Name, address, telephone, email address of surety point of contact, Employer Identification Number (EIN). The surety company has an option to check a box if Surety is authorized to post immigration bonds in all U.S. States &amp; Territories. If the box is not checked the surety company lists all the U.S. States and Territories in which the Surety is authorized to post immigration bonds.</p> <p><b>Information about the Agent(s) authorized as an agent to post immigration bonds on behalf of the Surety Company:</b></p>	



Name, address, telephone, email, agent or producer number (Surety Issued), Agent State License Number, Agency EIN. On addendum 2 of I-352SA, there is a box for the agent to check a box to add or deactivate eBONDS Access.

**Information about the Administrator(s) for the Surety or Agency:**

Name, Title, Surety, or Agency name, address, telephone, email, Surety or Agency EIN. On addendum 2 of I-352SA, there is a box for the Surety Administrator to check a box to add or deactivate eBONDS Access.

**Information about the Surety President:**

Name.

**Information about the Corporate Secretary:**

Name.

**Information about the Notary Public:**

Name.

**I-352-RA:**

**Information about the Surety Company:**

Name, EIN.

**Information about the Surety President:**

Name.

**Information about the Agent authorized as an attorney-in-fact:**

Name.



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>	
<input type="checkbox"/> Social Security number <input type="checkbox"/> Alien Number (A-Number) <input type="checkbox"/> Tax Identification Number <input 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> EIN	<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
g. List the <b>specific authority</b> 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 <b>why</b> 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 checked="" type="checkbox"/> Yes. Please describe how notice is provided. Surety companies 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:  <b>PIAs</b> <ul style="list-style-type: none"> <li>• DHS/ICE/PIA – 008 eBONDS Online System, and subsequent updates</li> <li>• DHS/ICE/PIA-005 Bond Management Information System, and subsequent updates</li> </ul>



	<ul style="list-style-type: none"> <li>• DHS/ICE-PIA-015 Enforcement Integrated Database (Updates (b) and (d) specifically discuss form I-352)</li> </ul> <p><b>SORNs</b></p> <ul style="list-style-type: none"> <li>• DHS/ICE-004 Bond Management Information System (BMIS) SORN</li> <li>• DHS/ICE 011 – CARIER SORN</li> </ul> <p><input type="checkbox"/>No.</p>
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3. How will DHS store the IC/form responses?	
<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/>Paper. Please describe. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Data from the forms are stored electronically in the ENFORCE Allen Removal Module (EARM), BMIS Web, eBONDS, and the eBONDS Document Repository System.</p> <p><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. If electronic, how does DHS input the</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Same data elements noted in Question No. 2(e)</p>





<p>responses into the IT system?</p>	<p><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 eBONDS and the second is with BMIS Web.</p>
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><input checked="" type="checkbox"/> By a unique identifier.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. It would depend on why the information is being retrieved/needed. It could be done by account #, name, surety company name, or address.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>I-352RA-I-352SA forms fall under Records Retention Schedule N1-567-11-02, which covers eBONDS.</p> <p>Under this schedule, the Master file is destroyed/deleted once the surety company is no longer U.S. Department of Treasury certified and all associated bonds have been deleted from the database.</p> <p>Approved bonds are maintained in the BMIS-Web system, and are destroyed/deleted no earlier than 48 hours and no later than 2 weeks after migration.</p> <p>For bonds that are not approved, the system automatically deleted these applications 2 weeks from the date when the record was initially created.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with</p>	<p>The ERO Bond Management Unit (BMU) takes mandatory ICE Records Training and follows ICE</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.



the retention schedule?	Records Guidance ensuring that the I-352RA-I-352SA 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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. <a href="#">Click here to enter text.</a>  <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. ICE makes available via eBONDS the appropriate bond-related documents to surety agents for those aliens for whom they have posted a surety bond.  <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.**



## PRIVACY THRESHOLD REVIEW

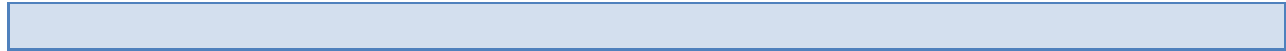
(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	<b>Kevin Mullinix</b>
Date submitted to component Privacy Office:	<b>May 6, 2019</b>
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>	
<p><b>This Electronic Bonds Online (eBONDS) Access Application and Agreement (I-352-SA), and eBONDS Rules of Behavior Agreement (I-352-RA) PTA is being submitted for review. Because this form collects information from the surety agent, or company on behalf of the bonded alien, and notary public, a Privacy Act notice is required. ICE Form 352, Immigration Bond, has coverage under the following PIAs and SORNs:</b></p> <p><b>PIAs</b></p> <ul style="list-style-type: none"> <li>• <b>DHS/ICE/PIA – 008 eBONDS Online System, and subsequent updates</b></li> <li>• <b>DHS/ICE/PIA-005 Bond Management Information System, and subsequent updates</b></li> <li>• <b>DHS/ICE-PIA-015 Enforcement Integrated Database (Updates (b) and (d) specifically discuss form I-352)</b></li> </ul> <p><b>SORNs</b></p> <ul style="list-style-type: none"> <li>• <b>DHS/ICE-004 Bond Management Information System (BMIS) SORN</b></li> <li>• <b>DHS/ICE 011 – CARIER SORN</b></li> </ul>	



**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 ADJUDICATION

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

DHS Privacy Office Reviewer:	<b>Hannah Burgess</b>
PCTS Workflow Number:	<b>1180579</b>
Date approved by DHS Privacy Office:	May 10, 2019
PTA Expiration Date	May 10, 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:	<b>Privacy Act Statement Required</b>
PTA:	<b>System PTA Required</b> Click here to enter text.



PIA:	<p><b>System covered by existing PIA</b></p> <p>If covered by existing PIA, please list: DHS/ICE/PIA-005 Bond Management Information System Web Version (BMIS Web) 2.2; DHS/ICE/PIA-008 eBonds Online System; DHS/ICE/PIA-015 Enforcement Integrated Database</p> <p>If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
SORN:	<p><b>System covered by existing SORN</b></p> <p>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</p> <p>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 Privacy is submitting this PTA for the data collected on the Electronic Bonds Online (eBonds) Access Application and Agreement (I-352-SA), and eBonds Rules of Behavior Agreement (I-352-RA) that enable ICE to determine whether to grant surety companies access privileges to eBonds. The forms collect PII, and information is retrieved by account #, name, surety company name, or address.</p> <p>DHS Privacy Office finds this is privacy sensitive. The collection of PII, by Form I-352RA and I-352SA, is covered by DHS/ICE/PIA-005, DHS/ICE/PIA-008, and DHS/ICE/PIA-015(b) and (d).</p> <p>SORN coverage is also required, and is provided by DHS/ICE-004 BMIS and DHS/ICE-011 CARIER.</p> <p>This form requires a privacy notice, which should be updated to include all applicable SORNs.</p>	