



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-192		
Form Title:	Application for Advance Permission to Enter as a Nonimmigrant		
Component:	U.S. Citizenship and Immigration Services (USCIS)	Office:	Service Center Operations (SCOPS)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Form I-192, <u>Application for Advance Permission to Enter as a Nonimmigrant</u>		
OMB Control Number:	1615-0017	OMB Expiration Date:	June 30, 2018
Collection status:	Choose an item.	Date of last PTA (if applicable):	April 7, 2015

PROJECT OR PROGRAM MANAGER

Name:	Scott Whelan		
Office:	Service Center Operations HQ	Title:	Adjudication Officer
Phone:	(202) 272-0940	Email:	Scott.p.whelan@uscis.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Kerstin A. Jager		
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Office:	Regulatory Coordination Division	Title:	Adjudication Officer
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 Update

Form I-192, *Application for Advance Permission to Enter as a Nonimmigrant* will expire on October 31, 2017. USCIS is submitting the Form I-192 PTA because the form is expiring and will be extended with updates to include data elements previously collected on Form G-325A that are being added to Form I-192. These data elements are listed below:

- Other names used by the applicant, including alias, maiden name, and nicknames
- Gender
- 5 years of employment history
- Mother’s name; date of birth; city or town and country of birth; current city of residence; current country of residence
- Father’s name; date of birth; city or town and country of birth; current city of residence; current country of residence
- Marital status
- Information about current spouse; Full Name; A-Number (if any); Date of Birth; Place of Birth; Place of Marriage
- Information about prior marriages; Full Name; Date of Birth; Date of Marriage; Place of Marriage ; Date Marriage Legally Ended; Place Where Marriage Legally Ended

Form I-192, Application for Advance Permission to Enter as a Nonimmigrant

USCIS uses this form to address inadmissibility of individuals seeking T (Victims of Severe Forms of Trafficking in Persons) and U (Victims of Criminal Activity) status under 8 CFR 212.16, 8 CFR 212.17, and 8 CFR 214.14, to apply for permission to enter the



United States. The form determines whether the individual should be admitted to the United States temporarily despite the inadmissibility. For T and U applicants, if the waiver is approved, this will allow the T or U to enter the US, or, if the T or U applicant is already in the US, allows the applicant to stay in the US and receive T or U nonimmigrant status.

Additionally, U.S. Customs and Border Protection (CBP) uses this form to grant temporary permission under INA section 212(d)(3)(A)(ii) and 8 CFR 212.4 to certain inadmissible nonimmigrants who are not required to obtain a visa or are already in possession of the appropriate documents but who wish to enter the United States through a U.S. Port-of-Entry (POE).

Relevant Information Technology

Data from Form I-192 is stored in CLAIMS 3. Form I-192 applications are submitted to the USCIS Vermont Service Center (VSC) and Nebraska Service Center (NSC) and are receipted and adjudicated in CLAIMS 3.

For those seeking entry into the United States as nonimmigrants with CBP at the Port-of-Entry (POE), the applicant files the Form I-192 with CBP. The CBP Admissibility Review Office uses the Automated Targeting System - Targeting Framework (ATS-TF) to process this form.

The physical form and supplemental evidence is stored in the A-file.

- 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, 1184, 1255, and in the implementing regulations found in volume 8 of the Code of Federal Regulations (CFR).

2. Describe the IC/Form



<p>a. Does this form collect any Personally Identifiable Information” (PII¹)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>b. From which type(s) of individuals does this form collect information? (Check all that apply.)</p>	<p><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.</p>
<p>c. Who will complete and submit this form? (Check all that apply.)</p>	<p><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. <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.</p>
<p>d. How do individuals complete the form? Check all that apply.</p>	<p><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></p>

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.



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.*

The following information is collected from the applicant on Form I-192:

- Full name
 - Alien Number (A-Number) (if any)
 - USCIS Online Account number (if any)
 - Date of Birth
 - Place of Birth
 - Citizenship or Nationality
 - Physical Address including zip code and country
 - Addresses where resided during the past 5 years
 - Desired Port-of-Entry
 - Mode of transportation to the United States
 - Date of planned entry into the United States
 - Approximate length of stay
 - Purpose of stay in the United States
 - Reason for inadmissibility
 - Date and location of Previous application for advance permission to enter the United States
 - Reason for the request (including inadmissibility), for T and U nonimmigrant seekers, including whether he/she has previously been in the United States
 - Whether the applicant has previously sought an immigration benefit with the United States
- Government
- Whether the applicant has ever been refused admission into the United States; and
 - Whether the applicant has ever been arrested, fined, convicted or otherwise engaged in any criminal activity (including impaired driving)
 - Applicant's Statement, Declaration, Certification, and Signature
 - Daytime Telephone Number
 - Mobile Telephone Number
 - Email Address
 - Ethnicity
 - Race
 - Height
 - Weight
 - Eye Color



- Hair Color
- Other names used by the applicant, including alias, maiden name, and nicknames
- Gender
- 5 Years of Employment History
- Mother's name; date of birth; city or town and country of birth; current city of residence; current country of residence
- Father's name; date of birth; city or town and country of birth; current city of residence; current country of residence
- Marital status
- Information about current spouse; Full Name; A-Number (if any); Date of Birth; Place of Birth; Place of Marriage
- Information about prior marriages; Full Name; Date of Birth; Date of Marriage; Place of Marriage ; Date Marriage Legally Ended; Place Where Marriage Legally Ended

The following information is collected from the interpreter:

- Full Name
- Business or Organization Name
- Mailing Address
- Daytime Telephone Number
- Mobile Telephone Number
- Email Address
- Certification and Declaration
- Language Fluency
- Signature
- Date of Signature

The following information is collected from the preparer (if any) on Form I-192:

- Mailing Address
- Daytime Telephone Number
- Mobile Telephone Number
- Email Address (if any)
- Accreditation Statement
- Declaration and Certification
- Signature
- Date of Signature



The following information is collected from an attorney or accredited representative:

- Volag Number
- Attorney State Bar Number
- USCIS Online Account Number (if any)

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 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 |
| <input type="checkbox"/> Other. <i>Please list:</i> | |

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

8 U.S.C. §§ 1103

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.

The information collected within the form I-192 application is used to assist the DHS in enforcing the immigration laws of the United States by providing timely and accurate information about persons who are subject to those laws.

i. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of*

Yes. Please describe how notice is provided.
The form may be completed by the petitioner or by a third party preparer (attorney, representative, preparer, etc.). The instructions state what information is required to complete the form.



<i>the collection or is form filled out by third party)?</i>	<p>There is a Privacy Act Statement in the form instructions.</p> <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 checked="" type="checkbox"/> Paper. Please describe. All Forms I-192 will be stored and kept as part of the applicant's A-file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. The information is stored in CLAIMS 3 and ATS</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 responses into the IT system?</p>	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Data elements are entered manually by USCIS contractors and USCIS adjudication officers who adjudicate the petitions and applications.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</p>
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the</p>	<p><input checked="" type="checkbox"/> By a unique identifier.² Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p>

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.



<p>information retrieved?</p>	<p>A user may search by the A-number, receipt number for the individual petition, or by name and date of birth.</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>Form I-192: DAA-0566-2017-0008 A-File: N1-566-08-11 CLAIMS3: DAA-0566-2016-0009</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>I-192 covered by DAA-0566-2017-0008 which is currently pending at NARA. All Forms I-192, approved and denied applications are stored in the Alien file and retained in accordance with the A-File retention schedule.</p>
<p>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>	
<p><input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. For those seeking entry into the United States as nonimmigrants with CBP at the POE, the applicant files the Form I-192 with CBP. CBP uses ATS-TF to process this form.</p> <p><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. Click here to enter text.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	





**Homeland
Security**

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
www.dhs.gov/privacy

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 16, 2017
Date submitted to DHS Privacy Office:	June 16, 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. Click here to enter text.
<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>The USCIS Office of Privacy recommendation is to designate Form I-192 as a privacy sensitive form with coverage under the following:</p> <p>PIAs <i>USCIS</i></p> <ul style="list-style-type: none"> DHS/USCIS/PIA – 016 Computer Linked Application Information Management Systems (CLAIMS) and Associated System, which covers the storage of electronic forms in CLAIMS 3 <p><i>CBP</i></p> <ul style="list-style-type: none"> DHS/CBP/PIA-006(b) Automated Targeting System (ATS) Update, which covers the use of ATS by the ARO. <p>SORNS</p> <ul style="list-style-type: none"> DHS/USCIS/CBP/ICE-001 Alien File, Index, and National File Tracking System of Records, which covers the collection, use, and storage of the Form I-192 and supplemental documents in the A-File 	



USCIS

- DHS/USCIS-007 Benefits Information System, which covers the collection, use, and storage of data elements USCIS collects from applicants, preparers, interpreters, and attorney or accredited representative

CBP

- DHS/CBP-006 – Automated Targeting System, which covers the collection and use of information to determine admissibility for applicants



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1145402
Date approved by DHS Privacy Office:	June 27, 2017
PTA Expiration Date	June 27, 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 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:	New e(3) statement is required. A new Privacy Notice needs to be provided with the updated Form.
PTA:	New system PTA required. Click here to enter text.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/USCIS/PIA-016 Computer Linked Application Information Management Systems (CLAIMS) and Associated System; DHS/CBP/PIA-006 Automated Targeting System (ATS)</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/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; DHS/CBP-006 Automated Targeting System, May 22, 2012, 77 FR 30297</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS Privacy is submitting this PTA on behalf of USCIS and CBP because Form I-192 is expiring and will be extended with updates to include data elements previously collected on Form G-325A that are being added to Form I-192. USCIS uses this form to address inadmissibility of individuals seeking T (Victims of Severe Forms of Trafficking in Persons) and U (Victims of Criminal Activity) status under 8 CFR 212.16, 8 CFR 212.17, and 8 CFR 214.14, to apply for permission to enter the United States.</p> <p>Additionally, CBP uses this form to grant temporary permission under INA section 212(d)(3)(A)(ii) and 8 CFR 212.4 to certain inadmissible nonimmigrants who are not required to obtain a visa or are already in possession of the appropriate documents but who wish to enter the United States through a U.S. Port-of-Entry (POE).</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because Form I-192 collects PII from members of the public including non-US persons. PRIV agrees with USCIS Privacy that CLAIMS 3 PIA and ATS PIA provide coverage. DHS/USCIS/PIA-016 covers the storage of electronic forms in CLAIMS 3. DHS/CBP/PIA-006(b) covers the use of ATS by the ARO.</p> <p>PRIV finds that a SORN is required because the Form I-192 retrieves information by a unique identifier. SORN coverage is provided by the A-File SORN, BIS SORN, and ATS SORN. DHS/USCIS/ICE/CBP-001 covers the collection, use, and storage of the</p>	



Form I-192 and supplemental documents in the A-File. DHS/USCIS-007 covers the collection, use, and storage of data elements USCIS collects from applicants, preparers, interpreters, and attorney or accredited representative. DHS/CBP-006 covers the collection and use of information to determine admissibility for applicants.

PRIV finds that a Privacy Notice is required because Form I-192 collects PII from non-US persons that are stored in a system of record. A new Privacy Notice needs to be provided with the updated Form.