



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 **Office:** Student and Exchange Visitor Program (SEVP) (ICE)

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:** April 30, 2021

Collection status: Revision **Date of last PTA (if applicable):** December 18, 2017

PROJECT OR PROGRAM MANAGER

Name: Michael Hallanan

Office: SEVP Policy **Title:** Policy analyst

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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name: Scott Elmore



Office:	ICE OCIO	Title:	ICE Forms Manager
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.

This U.S. Department of Homeland Security (DHS) Form I-17, *Petition for Approval of School for Attendance by Nonimmigrant Student*, OMB Control No. 1653-0038, is being submitted for a three-year renewal. There are no changes to this information collection.

The Student and Exchange Visitor Program (SEVP) was established as part of the Homeland Security Investigations (HSI) National Security Investigations Division (NSID) within U.S. Immigration and Customs Enforcement (ICE). SEVP's School Certification Unit (SCU) oversees the certification of public and private schools that enroll foreign nationals (and their dependents) seeking entry into the United States as nonimmigrant students under F and M classes of admission.

Schools file the Form I-17 petition as part of the school certification and recertification processes using SEVP's Student and Exchange Visitor Information System (SEVIS) after creating a SEVIS account. The Form I-17 petition consists of three parts:

- The first part of the I-17 contains the information to evaluate for adjudication.
- The second part of the I-17 is the I-17A, the "Record of Designated School Officials." The I-17A lists the employees who will serve as Designated School Officials (DSO), one of whom must be identified as the Principal Designated School Official (PDSO).
- The third part of the I-17 is the I-17B, the "Record of School Campuses." The I-17B is one (1) page and has four (4) slots to record different campuses and locations. If more than four campuses are included, the school can print additional pages through SEVIS.

The president, owner, or head of school selects the PDSO and any other DSO listed on the Form I-17A. The PDSO is the point of contact for the school and is required to print out the Form I-17 and all supporting documentation, obtain necessary signatures, scan all



documents into PDF files and upload these documents via SEVIS. Any updates to the Form I-17 petition for certification or recertification are also completed via SEVIS.

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.*

1. 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;
2. The Omnibus Consolidated Appropriations Act of 1997, Pub. L. No. 104-208, 110 Stat 3009;
3. U.S.A. PATRIOT Act of 2001, Public Law 107-56;
4. Homeland Security Presidential Directive-2 (HSPD 2, Combating Terrorism Through Immigration Policies, as amended by HSPD-5, Management of Domestic Incidents, Compilation of HSPDs);
5. 8 C.F.R. § 214.2(f); 8 C.F.R. § 214.2(m);
6. Approval of schools for enrollment of F and M nonimmigrants, 8 C.F.R Section 214.3;
7. Denial of certification, denial of recertification, or withdrawal of SEVP certification, 8 C.F.R Section 214.4

2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information” (PII¹)?

- Yes
 No

b. From which type(s) of individuals does this form collect information? *(Check all that apply.)*

- Members of the public
 U.S. citizens or lawful permanent residents
 Non-U.S. Persons.
 DHS Employees
 DHS Contractors
 Other federal employees or contractors.

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>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>1. Individuals with the authority to complete and submit a Form I-17 petition on behalf of the school that are identified as:</p> <p>a. a School owner (e.g., president, private owner); or</p> <p>b. a Primary Designated School Official for the school (pending SEVP approval).</p> <p><input checked="" type="checkbox"/> Legal Representative (preparer, attorney, etc.). Individuals authorized to prepare a Form I-17 petition on behalf of the school, which only includes contact information for purposes of the initial certification process.</p> <p><input type="checkbox"/> Business entity.</p> <p>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/> Yes</p> <p><input 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. Individuals authorized to prepare a Form I-17 petition on behalf of the school for the initial certification process may complete and submit information related to DSO nominees once signed by the DSO.</p>
<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) <i>Provide link: Only accessible via SEVIS.</i> https://egov.ice.gov/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.*

PII collected:

- Private School Owner Name (or president of board of trustees)
- Private School Owner Address
- School Official Name (PDSOs and/or DSOs)
- School Official Title
- School Official Address (i.e., school address)
- School Official Telephone Number
- School Official Email address
- School Official status – U.S. Citizen or Lawful 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 Personal Identifier (EDIPI) |
| <input 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 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, 8 U.S.C. § 1360, and 8 C.F.R. Part 214.3(l)(1)(i) authorize collection of the Alien Registration Number (A-number).

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.

Per SEVP Fact Sheet: *Designated School Official (DSO) Submissions* (effective May 21, 2018; <https://www.ice.gov/doclib/sevis/pdf/factSheetDsoSubmissions.pdf>), section 4.1 "For a Principal Designated School Official (PDSO) or DSO submission, submit one of the following as proof of U.S. citizenship or LPR:



- U.S. passport or passport card.
- U.S. birth certificate or birth certificate card.
- Alien registration card.
- Naturalization/citizenship certificate.”

Submission of the Alien registration number is an alternative for verification that the applicant is a U.S. citizen or LPR, as required by 8 C.F.R. Part 214.3(l)(1)(i).

<p>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>)?</p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Notice is provided at the time of collection. Schools officials and owners that complete the form are aware of the requirements and are provided notice at the time of collection. PDSO and/or DSO nominees are required to sign the Form I-17 petition before submission and thus, are aware that his or her information is being shared to to certify them as part of the school certification and recertification process before submission of the Form I-17.</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 type="checkbox"/> Paper. Please describe. N/A</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. SEVIS</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. SEVIS allows the school to scan signed documents and other supporting documentation into SEVP’s Student and Exchange Visitor Program Automated Management System (SEVPAMS).</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. Schools manually enter this information directly into SEVIS.</p> <p><input type="checkbox"/> Automatically. N/A</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.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Although retrieval is primarily done on the school name, the name of a private school owner may identify the name of an individual, such as the president of a board of trustees. <input checked="" type="checkbox"/> By a non-personal identifier. SEVIS allows authorized users to search information maintained on this form using a number of non-identifiers, such as school name, district, pending application, or school code. Additionally, the school name is linked or linkable to an individual (name of public school official or sole proprietor), and may be used to retrieve information related to a single individual for compliance and/or investigative purposes.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records in SEVIS are currently unscheduled and will be retained indefinitely until a records schedule is approved by the National Archives and Records Administration (NARA).</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>See above.</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 investigative purposes, information may be shared to such offices as ICE/HSI Counterterrorism and Criminal Exploitation Unit (CTCEU).</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. ICE shares information with external agencies and entities in accordance with SORN routine uses (e.g., investigative and program compliance purposes) and the Privacy Act</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.



Act of 1974. ICE continually shares information with the Department of Justice, Federal Bureau of Investigation via a SEVIS interface.

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:	Kevin Mullinix, Nicole LaCicero
Date submitted to component Privacy Office:	December 14, 2020
Date submitted to DHS Privacy Office:	January 5, 2021
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.
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 DHS Form I-17, <i>Petition for Approval of School for Attendance by Nonimmigrant Student</i> , has PIA coverage under DHS/ICE/PIA-001 SEVP and SORN coverage under DHS/ICE-001 SEVIS, and the publication of the forthcoming DHS/ICE-001 SEVP SORN.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Sean McGuinness
Approved by:	Riley Dean
PRIVCATS Workflow Number:	0015861
Date approved by DHS Privacy Office:	January 8, 2021
PTA Expiration Date	January 8, 2024

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.
Privacy Act Statement:	Choose an item. Privacy Act Statement found in Appendix approved along with this PTA
PTA:	No system PTA required. Click here to enter text.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/ICE/PIA-001 Student and Exchange Visitor Program. If a PIA update is required, please list: Click here to enter text.
SORN:	System covered by existing SORN



If covered by existing SORN, please list: DHS/ICE 001 Student and Exchange Visitor Information System, January 5, 2010, 75 FR 412 and forthcoming SEVP SORN.
If a SORN update is required, please list: [Click here to enter text.](#)

DHS Privacy Office Comments:

Please describe rationale for privacy compliance determination above.

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.

The DHS Privacy Office (PRIV) finds that Form I-17 is privacy sensitive as it collects PII from members of the public requiring PIA/SORN coverage.

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.

PRIV finds that a SORN is required because Form I-17 retrieves information by a personal identifier. PRIV agrees with ICE Privacy that DHS/ICE-001 SEVIS SORN covers the collection of SEVIS data. The forthcoming SEVP SORN will provide additional coverage.

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.



Appendix A – Privacy Act Statement

SEVIS – School Certification & Recertification

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

Privacy Act 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); the Omnibus Consolidated Appropriations Act of 1997, Pub. L. No. 104-208, 110 Stat 3009; USA PATRIOT Act of 2001, Pub. L. No. 107-56, 115 Stat 284; 8 U.S.C. § 1732; 8 U.S.C. § 1761, 8 U.S.C. § 1762; 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 C.F.R. § 214.2(f); 8 C.F.R. § 214.2(m); 8 C.F.R. § 214.3; and 8 C.F.R. § 214.4.

Purpose: The primary purpose for soliciting this information is for the adjudication of public and private schools seeking to enroll foreign nationals in a vocational or academic program and is required for participation in the Student and Exchange Visitor Program (SEVP). ICE SEVP uses the Student and Exchange Visitor Information System (SEVIS) to collect and maintain information as part of the school certification and recertification process to certify schools, Designated School Officials (DSO) and Principal DSOs (PDSO) nominated by schools, and to affirm knowledge of and compliance with federal immigration rules and regulations related to the admission and maintenance of status for F and M nonimmigrants, including requirements to maintain updated school and nonimmigrant student records in SEVIS.

Routine Uses: The information will be used by and disclosed to DHS personnel for agency purposes and with external parties in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b). Additionally, information may be shared with external parties, including federal, state, local, tribal, territorial, and foreign government and law enforcement entities and other parties for audit, enforcement, investigatory, litigation purposes, and pursuant to its published Privacy Act system of records notice. The DHS/ICE-001 SEVIS System of Records Notice (SORNs) and subsequent SORNs can be viewed at <https://www.dhs.gov/system-records-notice-sorn>.

Disclosure: The information collected is voluntary. However, where failure to provide the information requested may result in the denial of the initial school certification or school recertification process and the institution's and/or school official's eligibility to participate in the Student and Exchange Visitor Program.