



## 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>	Form I-131A		
<b>Form Title:</b>	Form I-131A Application for Travel Document (Carrier Documentation)		
<b>Component:</b>	U.S. Citizenship and Immigration Services (USCIS)	<b>Office:</b>	International Operations

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

<b>Collection Title:</b>	Form I-131A Application for Travel Document (Carrier Documentation)		
<b>OMB Control Number:</b>	OMB No. 1615-0135	<b>OMB Expiration Date:</b>	August 31, 2018
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	March 23, 2015

### **PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	Jessica Leigh		
<b>Office:</b>	International Operations	<b>Title:</b>	Adjudications Officer
<b>Phone:</b>	202-272-8116	<b>Email:</b>	Jessica.k.leigh@uscis.dhs.gov

### **COMPONENT INFORMATION COLLECTION/FORMS CONTACT**

<b>Name:</b>	Evadne Hagigal
--------------	----------------



Office:	USCIS, Office of Policy and Strategy	Title:	Management and Program Analyst
Phone:	202-272-0993	Email:	Evadne.J.Hagigal@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.*

#### **2018 EXTENSION**

USCIS is submitting this PTA to coincide with the Form I-131A (OMB No. 1615-0020) Paperwork Reduction Act (PRA) extension. As part of this PTA package, there were no changes to the form information collection.

#### **Form I-131A , Application for Travel Document**

USCIS created Form I-131A to allow individuals to apply for Carrier Documentation (Transportation Letter or Boarding Foil) at a U.S. Embassy or U.S. Consulate. The form may be submitted by an individual to the nearest U.S. Embassy or U.S. Consulate. Depending on the location, this may involve filing the application with either USCIS or the Department of State.

Carrier Documentation may be issued to a lawful permanent resident or conditional permanent resident of the United States who is not in possession of a valid, unexpired Permanent Resident Card, Reentry Permit, or other evidence of lawful permanent resident status (e.g., the card has expired, or was lost, stolen, destroyed/mutilated), so that the individual may be allowed to board a vessel or aircraft, travel to the United States, and present themselves at a U.S. port-of-entry for inspection as a returning lawful permanent resident. Carrier Documentation is only used overseas and is not filed domestically. The creation of the Carrier Documentation created a mechanism for USCIS to collect a fee for this service. The fee is used to cover processing costs.

Issuance of Carrier Documentation does not remove the requirement to replace or renew a Permanent Resident Card. To apply for a replacement or renewal of a Permanent Resident Card, the individual must file Form I-90, Application to Replace Permanent Resident Card, with USCIS.



Issuance of Carrier Documentation is discretionary and may not be appealed. Carrier Documentation does not guarantee admission or other form of entry into the United States, and U.S. Customs and Boarder Protection (CBP) will carry out all required inspection procedures upon arrival at a U.S. port-of-entry. Furthermore, DHS may revoke or terminate Carrier Documentation at any time.

### Relevant Information Technology

USCIS uses CAMINO to process the I-131A, and the information is entered into CLAIMS 3. At the Department of State, the I-131A will be processed in the Non-Immigrant Visa Operating System in CCD.

- 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 information requested on this form, and the associated evidence, is collected pursuant to Sections 101; 211; 212(d)(5); 264; and 273 of the Immigration and Nationality Act, as amended, as well as 8 CFR 211.1(a) and (b); 8 CFR 212.5(f); 8 CFR 264.1(c); 8 CFR 273.3.

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 <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.

<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 checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b></p> <p>The form may be filled out by an interpreter or a preparer that is not the applicant.</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>Information about the applicant:</p> <ul style="list-style-type: none"> <li>• Full Name</li> <li>• A-Number</li> <li>• Current and Mailing Address</li> <li>• Date of birth</li> <li>• Social Security number</li> </ul>	



- USCIS Online Account Number (if any)
- Country of birth
- Country of citizenship or nationality
- Gender
- U.S. Departure Date
- Date of Intended Travel to the United States
- Reason for Application
- Phone number
- E-mail address
- Signature
- The application also requests information about whether the applicant has ever filed a Form I-407, Abandonment of Lawful Permanent Resident Status, or ever been issued Carrier Documentation.

Information collected about the representative and accredited representative includes:

- Attorney State License Number
- Attorney or Accredited Representative USCIS Online Account Number (if any)

Information collected about the form preparer includes:

- Full Name
- Business or Organization Name
- Mailing Address
- Phone Number
- Fax Number
- Email Address
- Signature

Information collected about the interpreter includes:

- Full Name
- Business or Organization Name
- Mailing Address
- Phone Number
- Email Address



<ul style="list-style-type: none"> <li>• Signature</li> </ul>	
<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 checked="" type="checkbox"/> Social Security number <input checked="" 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 checked="" type="checkbox"/> Other. <i>Please list:</i> <ul style="list-style-type: none"> <li>• USCIS Online Account Number (if any)</li> <li>• Attorney State License Number</li> <li>• Attorney or Accredited Representative USCIS ELIS Account Number (if any)</li> </ul>	<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 <ul style="list-style-type: none"> <li>•</li> </ul>
<p>g. List the <b>specific authority</b> to collect SSN or these other SPII elements.</p>	
<p>The primary legal authority supporting the collection of information derives from 8 U.S.C. Section 1101; and 8 U.S.C. Section 1103 charges the DHS Secretary with the duty of administering and enforcing all laws relating to the immigration and naturalization of aliens.</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>The A-number and SSN information collected within the Form I-131A application is used to assist USCIS in enforcing the immigration laws of the United States by providing timely and accurate information about persons who are subject to those laws. USCIS personnel conduct background security checks on applicants for the purpose of determining whether the applicant has established eligibility for the benefit requested. The A-number and SSN are 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>	





<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. USCIS provides a Privacy Notice on the form instruction. Additionally, the form must be certified and signed by the applicant even if they use an attorney/preparer to fill out the form.</p> <p><input type="checkbox"/> No.</p>
--	---

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. The forms are currently held in an overseas T-file and then interfiled with the A-file; however, IO and IVCS are rolling out an I-131A Document Repository which will house all adjudicated forms electronically.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.</p> <p>If yes, please list: While the form does not actually connect to any systems, the information from the form is input into CLAIMS 3, CCD and/or CAMINO.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. The forms are currently held in an overseas T-file and then interfiled with the A-file; however, IO and IVCS are rolling out an I-131A Document Repository which will house all adjudicated forms electronically.</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.</p>





	<p>While the form does not actually connect to any systems, the information from the form is input manually into CLAIMS 3, CCD and/or CAMINO.</p> <p><input type="checkbox"/>Automatically. Please describe.  <a href="#">Click here to enter text.</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.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.      The information submitted on the form is retrieved by the USCIS Online Account Number and/or the applicant’s A-number.</p> <p><input type="checkbox"/>By a non-personal identifier. <i>Please describe.</i>  <a href="#">Click here to enter text.</a></p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>DAA-0566-2016-0022 covers adjudicative decision of Form I-131A. Destroyed 2 year(s) to 6 year(s) after the date of the adjudicative decision.</p> <p>N1-566-12-06 covers CAMINO records. Data is destroyed 25 years after the individual’s latest case completion date.</p> <p>DAA-0566-2016-0009 covers CLAIMS 3 records. Data is destroyed 50 years after the last completed action.</p> <p>N1-566-08-11 covers A-File records as permanent value.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>A-files and the I-131A Document Repository are retained permanently. After 25 years of existence, CAMINO will be checked to purge any records that have no completed action.</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.



	Data stored in CLAIMS 3 will follow the approved retention schedule for CLAIMS 3.
<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 type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.</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. The I-131A application is filed overseas with either USCIS or with the Department of State where USCIS is not co-located. The information from the form is input into CLAIMS 3, CCD and/or CAMINO. Ultimately, the USCIS adjudicated forms will be held in an electronic repository that is maintained by IVCS.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	



**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:	Jenny Hoots
Date submitted to component Privacy Office:	April 9, 2018
Date submitted to DHS Privacy Office:	April 10, 2018
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>
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>	
Form I-131A allows individuals to apply for a Carrier Evidence Document, which only allows them to board a commercial carrier for travel back to the United States. The USCIS Office of Privacy recommendation is to designate Form I-131A as privacy sensitive with coverage under:	
<p><i>Privacy Impact Assessment</i></p> <ul style="list-style-type: none"> <li>• DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO)</li> <li>• DHS/USCIS/PIA-016(a) CLAIMS 3 PIA and Associated Systems</li> <li>• DOS Consular Consolidated Database (CCD) PIA</li> </ul> <p><i>System of Records Notice</i></p> <ul style="list-style-type: none"> <li>• DHS-USCIS-001 – A-File SORN</li> <li>• DHS-USCIS-007 - Benefits Information System SORN</li> <li>• STATE-05-Overseas Citizens Services Records SORN</li> </ul>	



## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	<b>Kameron Cox</b>
PCTS Workflow Number:	<b>1161455</b>
Date approved by DHS Privacy Office:	April 19, 2018
PTA Expiration Date	April 19, 2019

### 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 approved this ICR/Form.
Date IC/Form Approved by PRIV:	April 16, 2018
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	<b>Current Privacy Act Statement is adequate</b>
PTA:	<b>Current CLAIMS 3 PTA and CAMINO PTA are adequate</b>
PIA:	<b>PIA Appendix update required</b>



	<p>If a PIA update is required, please list: Update to DHS/USCIS/PIA-016a Computer Linked Application Information Management System (CLAIMS 3) and Associated Systems Update to DHS/USCIS/PIA-051 Case and Activity Management for International Operations (CAMINO)</p>
<p>SORN:</p>	<p><b>System covered by existing SORN</b> If covered by existing SORN, please list: DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, September 18, 2017, 82 FR 43556; DHS/USCIS-007 Benefits Information System, October 19, 2016 81 FR 72069</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>USCIS is submitting this PTA to renew compliance documentation for Form I-131A, <i>Application for Travel Document (Carrier Documentation)</i>. Carrier Documentation may be issued to a LPR or conditional permanent resident whose immigration documentation has expired, was lost, stolen, or destroyed. Form I-131A allows the individual to board a vessel or aircraft, travel to the United States, and present themselves at a port of entry. There have been no changes to the form since the last PTA adjudication.</p> <p>The DHS Privacy Office (PRIV) agrees with USCIS that Form I-131A is a privacy sensitive information collection, requiring PIA coverage, because it collects PII from members of the public. PRIV finds that an update to the appendix of DHS/USCIS/PIA-016(a) CLAIMS 3 and DHS/USCIS/PIA-051 CAMINO are necessary to provide transparency that the form is processed in their respective systems.</p> <p>PRIV concludes that SORN coverage is necessary because Form I-131A information is later retrieved by a unique identifier. PRIV finds that the DHS/USCIS/ICE/CBP-001 A-File SORN covers the collection of information on the form for the administration of the immigration system. DHS/USCIS-007 BIS SORN covers the adjudicative data collected by USCIS that may not appear in the A-File.</p> <p>This Form contemplates information sharing with the Department of State. PRIV finds that such sharing is compatible under routine use O of the A-File SORN and routine use I of the BIS SORN to assist with the processing of immigration benefits.</p> <p>PRIV finds that a Privacy Act Statement is required because Form I-131A collects information from US Persons and non US Persons that is then entered into a system of records. PRIV concludes that the current Privacy Act Statement provides the public adequate notice.</p> <p>This PTA will expire in one year due to its reliance upon two PIA appendix updates.</p>	



**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)