



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:	ICE Form I-352		
Form Title:	Immigration Bond		
Component:	Immigration and Customs Enforcement (ICE)	Office:	Enforcement and Removal Operations

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Immigration Bond		
OMB Control Number:	OMB No. 1653-0022	OMB Expiration Date:	August 31, 2017
Collection status:	Revision	Date of last PTA (if applicable):	Not applicable

PROJECT OR PROGRAM MANAGER

Name:	Carl Albritton		
Office:	ERO	Title:	Management and Program Analyst
Phone:	(202) 732-5918	Email:	carl.a.albritton@ice.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Scott Elmore		
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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.

An immigration bond is posted as security for performance and fulfillment of the bonded alien’s obligations to the Government. The data collected on Form I-352 “Immigration Bond” is used by ICE to ensure that the person or company posting the bond is aware of the duties and responsibilities associated with the bond. By completing this form, the bond obligor (either an individual or a surety company) provides a formal, written guarantee as security for the amount of the bond, thereby assuring DHS that all of the conditions of the bond will be fulfilled.

This form collects information about the bond obligor, the alien for whom the bond is furnished, DHS employees, and individuals who pledge bonds, notes, or cash. The complete list of data elements collected on this form can be found in the answer to Question 2e (below). Members of the public (i.e., bond obligors) complete and sign Form I-352 in person at a local ERO field office. Surety agents log into the electronic Bonds Online System (eBONDS) to complete, and submit the I-352 to ERO.

- 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 Immigration and Nationality Act, as amended, (8 U.S.C. 1103, 1183, 1226, 1229c, and 1363) authorizes the collection of information on this form. The Internal Revenue Code (26 U.S.C. 6109) and Executive Order 9397 authorize the collection of the Social Security number (SSN). 8 U.S.C. 1103 and 1360 authorize collection of the Alien Registration Number (A-number).



2. Describe the IC/Form	
a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<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 <ul style="list-style-type: none"> <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons. <input checked="" 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? (Check all that apply.)	<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. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input checked="" type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Names and signatures of individuals who pledge bonds, notes, or cash.

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>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> https://ebonds.ice.gov/ebonds/welcome.do</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 obligor:</p> <p>Name, physical address, phone number, signature, power of attorney number, and Taxpayer Identification Number (TIN). If the obligor is a sole proprietor, the TIN might be an individual's SSN. For cash bonds, the obligor's SSN is collected to pay interest through the U.S. Treasury Department and to comply with Internal Revenue Service requirements to report interest payments.</p> <p>Information about the surety agent:</p> <p>Name of Agent, physical address, telephone number, power of attorney number.</p> <p>Information about the surety company:</p> <p>Company name, physical address, phone number, TIN. If the surety company is a sole proprietor, the TIN might be an individual's SSN.</p> <p>Information about the alien for whom the bond is posted:</p> <p>Name, alien registration number (A-number), bond receipt number, current location (i.e., where detained), date and country of birth, nationality, date, port and means of arrival in the United States, address where alien is to reside, and telephone number at alien's residence.</p> <p>Information about DHS employee:</p> <p>Field Office Director Name and signature.</p>	



<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>	
<p><input checked="" type="checkbox"/> Social Security number</p> <p><input checked="" type="checkbox"/> Alien Number (A-Number)</p> <p><input checked="" type="checkbox"/> Tax Identification Number</p> <p><input type="checkbox"/> Visa Number</p> <p><input type="checkbox"/> Passport Number</p> <p><input type="checkbox"/> Bank Account, Credit Card, or other financial account number</p> <p><input type="checkbox"/> Other. <i>Please list:</i></p>	<p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</p> <p><input type="checkbox"/> Social Media Handle/ID</p> <p><input type="checkbox"/> Known Traveler Number</p> <p><input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)</p> <p><input type="checkbox"/> Driver's License Number</p> <p><input type="checkbox"/> Biometrics</p>
<p>g. List the specific authority to collect SSN or these other SPII elements.</p> <p>The Internal Revenue Code (26 U.S.C. 6109) and Executive Order 9397 authorizes the collection of the SSN. 31 U.S.C. 7701(c)(1) authorizes the collection of the TIN. 8 U.S.C. 1103 and 1360 authorize collection of the Alien Registration Number (A-number).</p>	
<p>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.</p> <p>For cash bonds, the obligor's SSN is necessary to pay interest through the U.S. Treasury Department and to comply with Internal Revenue Service requirements to report interest payments. The obligor's, surety agent's, or surety company's SSN (in the case of a sole proprietor) or TIN will also be used for the purposes of collecting and reporting information on any delinquent accounts arising out of the individual's relationship with the Government. ICE must collect the A-number as a means to properly identify the alien for whom the bond is being posted.</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</i></p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided.</p> <p>Bond obligors and surety agents have notice of the collection because they are the individuals supplying the information on the form.</p>



<p><i>filled out by third party)?</i></p>	<p>Additionally, notice is provided by the privacy notice that is on the form, and by the following ICE privacy compliance documentation:</p> <p>ICE PIAs</p> <ul style="list-style-type: none"> • DHS/ICE/PIA-005(a) Bond Management Information System 2009 • DHS/ICE/PIA-005 Bond Management Information System 2008 • DHS/ICE-PIA-015(b) Enforcement Integrated Database (EID) ENFORCE Alien Removal Module (EARM 3.0) • DHS/ICE/PIA-008 eBonds Online System <p>ICE SORNs</p> <ul style="list-style-type: none"> • DHS/ICE-004 Bond Management Information System of Records Notice (SORN) • DHS / ICE 011 – Criminal Arrest Records and Immigration Enforcement Records (CARIER) <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.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.</p> <p>Forms are stored electronically in the ENFORCE Alien Removal Module (EARM), Bond Management Information System – Web (BMIS Web), eBONDS, and the eBONDS SharePoint document repository.</p>



	<input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Forms are not scanned
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Same data elements noted in Question No. 2(e) <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 Electronic Bond Online System (eBONDS) and the second is with ICE’s Bond Management Information System/Web Version (BMIS Web).
<p>c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</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. A-number, Name, and bond receipt number <input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Not applicable.
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Form I-352 falls under Records Retention Schedule N1-566-08-11, which covers Alien Files. These files are kept permanently after transfer to 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>The ERO Bond Management Unit (BMU) takes mandatory ICE Records Training and follows ICE Records Guidance ensuring that I-352 forms are disposed of in accordance with the applicable retention schedules.</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.



f. Is any of this information shared outside of the original program/office? *If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?*

Yes, information is shared with other DHS components or offices. Please describe.
This information will be used by and disclosed to U.S. Citizenship and Immigration Services and U.S. Customs and Border Protection or to other DHS personnel and contractors who need the information to support the enforcement of immigration laws and the provision of immigration benefits.

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

DHS may share this information with the U.S. Treasury Department to report interest paid to an obligor, and to facilitate payments to or collection of monies owed by an obligor. DHS may also share this information with the U.S. Justice Department and other Federal and State agencies for collection, enforcement, investigatory, or litigation purposes, or as otherwise authorized pursuant to the relevant System of Records Notice (SORN).

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
Date submitted to component Privacy Office:	September 11, 2017
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>This ICE Form 352, Immigration Bond PTA is being submitted for review. Because this form collects information from the surety agent, or company on behalf of the bonded alien, a Privacy Act notice is required. ICE Form 352, Immigration Bond, has coverage under the following PIAs and SORNs:</p> <ul style="list-style-type: none"> • DHS/ICE/PIA-005(a) Bond Management Information System 2009 • DHS/ICE/PIA-005 Bond Management Information System 2008 • DHS/ICE-PIA-015(b) EID EARM 3.0 • DHS/ICE/PIA-008 eBonds Online System • DHS/ICE-004 Bond Management Information SORN • DHS/ICE 011 – CARIER SORN 	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1149856
Date approved by DHS Privacy Office:	September 19, 2017
PTA Expiration Date	September 19, 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 commented on 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:	e(3) statement update is required. Privacy Act Statement needs to be updated to a Privacy Notice
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/ICE/PIA-005 Bond Management Information System (BMIS) and subsequent updates; DHS/ICE/PIA-015(b) Enforcement Integrated Database (EID) ENFORCE Alien Removal Module (EARM 3.0); DHS/ICE/PIA-008 eBonds Online System</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/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: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>ICE Privacy is submitting this PTA because the data collected on Form I-352 “Immigration Bond” is used by ICE to ensure that the person or company posting the bond is aware of the duties and responsibilities associated with the bond. By completing this form, the bond obligor (either an individual or a surety company) provides a formal, written guarantee as security for the amount of the bond, thereby assuring DHS that all of the conditions of the bond will be fulfilled. This form collects information about the bond obligor, the alien for whom the bond is furnished, DHS employees, and individuals who pledge bonds, notes, or cash. Surety agents log into the electronic Bonds Online System (eBONDS) to complete, and submit the I-352 to ERO.</p> <p>PRIV finds that is a privacy sensitive system and a PIA is required because Form I-352 Immigration Bond collects PII from members of the public as well as DHS employees. PRIV agrees with ICE Privacy that Bond Management Information System (BMIS) PIAs, EID EARM PIA, and eBonds Online System PIA provide coverage. DHS/ICE/PIA-005 and subsequent updates discuss the lifecycle of immigration bonds. DHS/ICE/PIA-015(b) covers the interfaces that provide data to EID in support of the electronic processing of immigration bonds. DHS/ICE/PIA-008 covers the electronic Form I-352.</p> <p>PRIV finds that a SORN is required because Form I-352 retrieves information by unique identifier. PRIV agrees with ICE Privacy that the CARIER SORN and BMIS</p>	



SORN provide coverage. DHS/ICE-011 covers records collected to support the grant or denial of parole, and tracking of individuals who seek or receive parole into the United States. DHS/ICE-004 covers records related to the administration and financial management operations of ICE's immigration bond program.

PRIV finds that a Privacy Notice is required because members of the public who are potential non-us persons may complete this form. The Privacy Act Statement attached to the Form submitted with this PTA must be updated to include the name change from Privacy Act Statement to Privacy Notice and to add Routine Uses pursuant to the CARIER SORN. Please resubmit the form for approval once the update is made.