The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
703-235-0780, pia@dhs.gov
www.dhs.gov/privacy

Privacy Threshold Analysis
Version date: June 10th, 2009
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PRIVACY THRESHOLD ANALYSIS (PTA)

**This form is used to determine whether
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards
Director of Privacy Compliance
The Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, www.dhs.gov/privacy, on DHSOnline and directly from the DHS Privacy Office via email: pia@dhs.gov, phone: 703-235-0780.

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PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.
Upon receipt, the DHS Privacy Office will review this form
and may request additional information.

SUMMARY INFORMATION

DATE submitted for review:

NAME of Project: Continued Dumping and Subsidy Offset Act of 2000 (CDSOA) database

Name of Component: Customs and Border Protection

Name of Project Manager: James Mich

Email for Project Manager: JAMES.E.MICH@dhs.gov

Phone number for Project Manager: 202-344-2372

TYPE of Project:

☐ **Information Technology and/or System***

☐ **A Notice of Proposed Rule Making or a Final Rule.**

☒   **Other: The CDSOA database has been created to collect "certification" information as required under 19 C.F.R §159.63(b) and to process the distribution of funds collected under 19 USC § 1675c.**

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* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•"Information Technology" means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•"Information System" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.

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SPECIFIC QUESTIONS

1. **Describe the project and its purpose:**

   The Continued Dumping and Subsidy Offset Act of 2000 (CDSOA) database is maintained for the purpose of distributing duties assessed pursuant to a countervailing duty order, an antidumping duty order, or a finding under the Antidumping Act of 1921, on an annual basis to affected domestic producers for qualifying expenditures. This database comprises information submitted by claimants under the CDSOA. The purpose of the database is to index and track the information submitted by claimants, compute the amount of distribution, and to generate statements and required public notifications.

2. **Status of Project:**

   ☐ This is a new development effort.

   ☒ This is an existing project.

   > Date first developed:
   >
   > Date last updated:
   >
   > The fields "Start Date of Qualifying Expenditures" and "End Date of Qualifying Expenditures" have been added as collected data elements.

3. **Could the project relate in any way to an individual?[1]**

   ☐ No. Please skip ahead to the next question.

   ☒ Yes. Please provide a general description, below.

   The system collects names, contact information, and identification numbers such as Social Security Numbers's or Employee Identification Numbers, from Claimants to funds collected under the CDSOA.

4. **Do you collect, process, or retain information on: (Please check all that apply)**

   ☐ DHS Employees

   ☐ Contractors working on behalf of DHS

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[1] Projects can relate to individuals in a number of ways. For example, a project may include a camera for the purpose of watching a physical location. Individuals may walk past the camera and images of those individuals may be recorded. Projects could also relate to individuals in more subtle ways. For example, a project that is focused on detecting radioactivity levels may be sensitive enough to detect whether an individual received chemotherapy.

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☒ The Public

☐ The System does not contain any such information.

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5. **Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)**

   ☐ No.

   ☒ Yes. Why does the program collect SSNs? Provide the function of the SSN and the

   legal authority to do so:

   SSN''s are collected to identify claimants pursuant to the authority granted under 19 C.F.R § 159.63(b).

6. **What information about individuals could be collected, generated or retained?**

   The name of the domestic producer and any name qualifier, if applicable (for example, any other name under which the domestic producer does business or is also known); The mailing address of the domestic producer (if a post office box, the physical street address must also appear) including, if applicable, a specific room number or department; The Internal Revenue Service (IRS) number (with suffix) of the domestic producer, employer identification number, or social security number, as applicable; The specific business organization of the domestic producer (corporation, partnership, sole proprietorship); The name(s) of any individual(s) designated by the domestic producer as the contact person(s) concerning the certification, together with the phone number(s), mailing address and, if available, facsimile transmission number(s) and electronic mail (e-mail) address(es) for the person(s).

7. **If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?**

   ☒ No. Please continue to the next question.

   ☐ Yes. Is there a log kept of communication traffic?

      ☐ No. Please continue to the next question.

      ☐ Yes. What type of data is recorded in the log? (Please choose all that apply.)

         ☐ Header

         ☐ Payload Please describe the data that is logged.

      <Please list the data elements in the log.>

8. **Can the system be accessed remotely?**

   ☒ No.

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☐ Yes.   When remote access is allowed, is the access accomplished by a virtual private network (VPN)?

☐ No.

☐ Yes.

9. **Is Personally Identifiable Information[2] physically transported outside of the LAN? (This can include mobile devices, flash drives, laptops, etc.)**

☒ No.

☐ Yes.

10. **Does the system connect, receive, or share Personally Identifiable Information with any other DHS systems[3]?**

☐ No

☒ Yes. Please list:

The database syncs contact and address information with ACS in order to process payments to claimants.

11. **Are there regular (ie. periodic, recurring, etc.) data extractions from the system?**

☒ No.

☐ Yes. Are these extractions included as part of the Certification and Accreditation[4]?

☐ Yes.

☐ No.

12. **Is there a Certification & Accreditation record within OCIO's FISMA tracking system?**

☒ Unknown.

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[2] Personally Identifiable Information is information that can identify a person. This includes; name, address, phone number, social security number, as well as health information or a physical description.

[3] PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in TAFISMA.

[4] This could include the Standard Operation Procedures (SOP) or a Memorandum of Understanding (MOU)

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☐ No.

☐ Yes. Please indicate the determinations for each of the following:

Confidentiality: ☐ Low ☐ Moderate ☐ High ☐ Undefined

Integrity: ☐ Low ☐ Moderate ☐ High ☐ Undefined

Availability: ☐ Low ☐ Moderate ☐ High ☐ Undefined

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PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office:

NAME of the DHS Privacy Office Reviewer: <Please enter name of reviwer.>

DESIGNATION

☐ **This is NOT a Privacy Sensitive System** – the system contains no Personally Identifiable Information.

☐ **This IS a Privacy Sensitive System**

    Category of System

        ☐ IT System

        ☐ National Security System

        ☐ Legacy System

        ☐ HR System

        ☐ Rule

        ☐ Other:

    Determination

        ☐ PTA sufficient at this time

        ☐ Privacy compliance documentation determination in progress

        ☐ PIA is not required at this time

        ☐ A PIA is required

            ☐ System covered by existing PIA:

            ☐ A new PIA is required.

            ☐ A PIA Update is required.

        ☐ A SORN is required

            ☐ System covered by existing SORN:

            ☐ A new SORN is required.

DHS PRIVACY OFFICE COMMENTS