



**Homeland
Security**

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.



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: April 21, 2010

NAME of Project: Implementation of the Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978

Name of Component: US Coast Guard

Name of Project Manager: Zoe Goss, CG-5221

Email for Project Manager: zoe.a.goss@uscg.mil

Phone number for Project Manager: 202-372-1425

TYPE of Project:

Information Technology and/or System*

A Notice of Proposed Rule Making or a Final Rule.

Other: <Please describe the type of project including paper based Privacy Act system of records.>

* 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.



SPECIFIC QUESTIONS

1. Describe the project and its purpose:

To amend Coast Guard regulations to implement changes to the interim rule (IR) published on June 26, 1997 (62 FR 34505). These proposed changes incorporate certification and training requirements for merchant mariners based on amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, (STCW Convention), as well as the Seafarer's Training, Certification and Watchkeeping Code (STCW Code), as adopted by the International Maritime Organization in 1995 and 2010.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: March 26, 1996

Date last updated: November 17, 2009

The initial notice of proposed rulemaking (NPRM) regarding this project was published in the Federal Register (FR) on March 26, 1996 (61 FR 13284). An interim rule (IR) was published in the FR on June 26, 1997 (62 FR 34505). On November 17, 2009, the Coast Guard published a supplemental NPRM (SNPRM) with proposed changes (74 FR 59354).

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 rule proposed by this SNPRM would update and restructure the current regulations based on the 1995 and 2010 amendments to the STCW Convention and STCW Code and based on comments received in response to the 2009 SNPRM. These changes would clarify service and training requirements which must be accomplished by individual mariners to obtain STCW and domestic endorsements.

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

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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- DHS Employees
- Contractors working on behalf of DHS
- The Public
- The System does not contain any such information.



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:

The Coast Guard has used the SSN for some time as a method of associating a mariner with a particular mariner record as well as associating any payment(s) to that record. However, the proposed rule discussed in the SNPRM imposes no new requirements for using/collecting SSNs.

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

This program (the merchant marine licensing and documentation program) requires that mariners submit sufficient information to determine whether the mariner meets the personal, physical, and professional requirements for a maritime credential, specifically for the international endorsement necessary to work on vessels operating seaward of the boundary line. Examples of such information include the results of medical examinations, training records, and service experience.

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.

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



- No.
- Yes.

9. **Is Personally Identifiable Information² 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 systems³?**

- No
- Yes. Please list:

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 Accreditation⁴?
 - Yes.
 - No.

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

- Unknown.
- No.
- Yes. Please indicate the determinations for each of the following:

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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Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined



PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: April 30, 2010

NAME of the DHS Privacy Office Reviewer: Rebecca J. Richards

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: MMLD
- A new PIA is required.
- A PIA Update is required.
- A SORN is required
- System covered by existing SORN: DHS/USCG-030
- A new SORN is required.

DHS PRIVACY OFFICE COMMENTS



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This Rule will be covered under the upcoming Merchant Mariner Licensing and Documentation (MMLD) System PIA.