



## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**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](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto: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:** February 24, 2011  
**NAME of Project:** National Recreational Boating Survey  
**Name of Component:** US Coast Guard  
**Name of Project Manager:** Philippe Gwet  
**Email for Project Manager:** Philippe.gwet@uscg.mil  
**Phone number for Project Manger:** 202-372-1102

**TYPE of Project:**

- Information Technology and/or System\*
- A Notice of Proposed Rule Making or a Final Rule.
- Other: National survey of recreational boating participants

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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.



## SPECIFIC QUESTIONS

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

The United States Coast Guard's (USCG) National Recreational Boating Safety (NRBS) program objective is to ensure the public has a safe, secure, and enjoyable recreational boating experience by implementing programs that minimize loss of life, personal injury, and property damage while cooperating with environmental and national security efforts. The NRBS information collection project enables the USCG to better identify safety priorities, coordinate and focus research efforts, and encourage consistency in the information that is collected as well as the applied analysis methods.

Some survey respondents will return completed questionnaires by mail, while others will take a telephone interviews, and submit their responses online by completing a webform. Respondents are typically recreational boating participants, who may or may not own any boat. The USCG will use that data for various purposes, including the cost-benefit analysis of regulatory projects, providing guidance to states in the development of their safety education programs or safety awareness campaigns. Summary statistics may also be provided to the USCG boating partners in the industry and academia.

**2. Status of Project:**

This is a new development effort.

This an existing project.

Date first developed:

Date last updated:

<Please provide a general description of the update.>

**3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?**

Yes.

No. Please describe the information source and collection method.

The information will be collected directly from recreational boating participants, by mail, by telephone as well as via a web-form

**4. Does the individual have the option to decline submitting the information collected?**



Yes.

No.

5. **Is the information collected limited to non-sensitive personally identifiable information? An example of sensitive personally identifiable information is the social security number or date of birth.**

Yes.

No.

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

The NRBS collects first names, street addresses, phone numbers, and email addresses in addition to general boating information (e.g. type of boat used, frequency of use, duration of a boating trip, boating safety courses taken, number of years of experience operating a boat, usage of safety equipment, type of boating activity engaged in, etc.). Individuals will report this data themselves either by mail or by telephone. Occasionally boaters will submit their data online by completing an web-form.

The Coast Guard will use the following two methods (Random Digit Dialing (RDD) & Mailing) for contacting the boaters:

(i) RDD Method

This method is widely used in government-sponsored surveys, and is based on computer-generated random telephone numbers. These telephone numbers are made up by generating one digit at a time randomly chosen between 0 and 9. The number obtained may or may not be a working number. Non-working numbers as well as numbers associated with non-boating households will be eliminated. The computer will randomly generate a large number of such telephone numbers, and interviewers will dial them until the quota of responding boaters is reached. The randomly-generated phone number may happen to be that of boater by pure chance.

(ii) Mailing Method

The Coast Guard will ask the states to contact the recreational boaters on its behalf, asking them whether they are willing to participate in the National Recreational Boating Survey. Only those individuals who would agree to participate will receive the survey questionnaire by mail. The survey questionnaire will then request an email address from the survey participant in case there is a need to collect further data from the same boater at a later time.



7. **Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

8. **With whom could the information be shared?**

The USCG may share statistical data with its boating partners from industry and academia. Personal data is not transmitted to any third party.

9. **Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

10. **Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**

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



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: February 28, 2011

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: National survey of recreational boating participants

### 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: DHS General Contact Lists
- A new PIA is required.
- A PIA Update is required.
- A SORN is required
- System covered by existing SORN: DHS/ALL-002-Department of Homeland Security (DHS) Mailing and Other Lists System November 25, 2008, 73 FR 71659
- A new SORN is required.



**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 10<sup>th</sup>, 2009**

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#### **DHS PRIVACY OFFICE COMMENTS**

The NRBS collects the first names, street addresses, phone numbers & email addresses of registered/non-registered boat owners and non-owners. This collection is covered by the DHS Contact List PIA and DHS/ALL-002.