



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:	CG-4423
Form Title:	Application for Marine Event
Component:	U.S. Coast Guard (USCG) Office: CG-WWM-1

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Regattas and Marine Parades		
OMB Control Number:	1625-0008	OMB Expiration Date:	September 30, 2017
Collection status:	Extension	Date of last PTA (if applicable):	October 1, 2014

PROJECT OR PROGRAM MANAGER

Name:	CDR Justin W. Jacobs		
Office:	CG-WWM-1	Title:	Staff Officer
Phone:	202-372-1530	Email:	Justin.w.jacobs@uscg.mil

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Anthony Smith		
Office:	CG-612	Title:	PRA Manager
Phone:	202-475-3532	Email:	Anthony.D.Smith@uscg.mil



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

The permit application provides the Coast Guard with the minimum information needed to identify the marine event and the event contact to consider whether or not an event is likely to result in the loss of human life unless special precautions are taken.

Marine events may actually block navigation channels or cause interference with adjacent vessel traffic or with the ability of larger commercial vessels to safely navigate designated shipping lanes. Also, adjacent vessel traffic may interfere with the safety or conduct of the marine event.

CG Form 4423 contains basic business contact information which may include the name, address, and phone number of any event sponsor wishing to conduct activity that may block, or impede safe navigation on the navigable waters of the United States.

Information is collected in accordance with 33 CFR 100.

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? (<i>Check all that apply.</i>)	<input checked="" type="checkbox"/> Members of the public <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons.

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.



	<input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
<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 type="checkbox"/> Legal Representative (preparer, attorney, etc.).</p> <p><input type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.</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 checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i> https://homeport.uscg.mil/mycg/portal/ep/marine_event/marine_event_form.jsp</p>
<p>e. What information will DHS collect on the form?</p>	
<p>Name, address, and phone number.</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No.</p>	



<input type="checkbox"/> Social Security number <input 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 type="checkbox"/> Other. <i>Please list:</i>		<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	
<p>g. List the <i>specific authority</i> to collect SSN or these other SPII elements.</p>			
<p>N/A.</p>			
<p>h. How will this information be used? What is the purpose of the collection? Describe <i>why</i> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.</p>			
<p>N/A.</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>x<input type="checkbox"/> Yes. Please describe how notice is provided. The Privacy Act Statement is placed on the bottom of Form CG-4423. <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 type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Scanned forms are entered into the Marine Information for Safety and Law Enforcement (MISLE) database which is the CG's resource for information for marine safety, law enforcement, search and rescue, geographical information systems, commercial fishing vessel safety and many other aspects of CG operations. It is an administrative record.</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. Authorized USCG personnel manually enter scanned documents into the MISLE database for administrative record purposes.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</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 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. Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Each MISLE activity is assigned a non-personal identifier (Activity Number) and does not include any PII.</p>
<p>d. What is the records retention</p>	<p>Records are Permanent: Cut off all associated case and activity data with their attachment pertaining to a case at</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.



<p>schedule(s)? <i>Include the records schedule number.</i></p>	<p>end of calendar year in which the case is closed. Transfer to the National Archives 5 years blocks immediately after the latest cutoff. NARA retention schedule number N1-026-05-015.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>As records are maintained in the MISLE database, disposal/deletion is in accordance with the business rules for the database.</p>
<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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. The information is not explicitly shared, but is accessible to MISLE users if they choose to search for specific information regarding Marine Event Permits. The form is typically scanned and uploaded to the corresponding MISLE activity report.</p> <p><input 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. Click here to enter text.</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:	Kenlinishia Tyler
Date submitted to component Privacy Office:	September 9, 2016
Date submitted to DHS Privacy Office:	Nov. 3, 2016
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 type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. The Privacy Act Statement has been in existence and is on the bottom of the form.
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>CG Form 4423 is utilized to provide the Coast Guard with the minimum information needed to identify the marine event and the event contact to consider whether or not an event is likely to result in the loss of human life unless special precautions are taken.</p> <p>The Coast Guard will use this information to determine whether an event poses an extra or unusual hazard to the safety of life and whether or not, and under which conditions, to permit the event on the navigable waters of the United States.</p> <p>A member completes/submits the CG-4423. CG-4423 is scanned and uploaded/retained in the Marine Information for Safety and Law Enforcement (MISLE) database.</p> <p>DHS/USCG/PIA-008 and DHS/USCG-013 provides coverage for this collection.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Michael Capparra
PCTS Workflow Number:	1134517
Date approved by DHS Privacy Office:	November 4, 2016
PTA Expiration Date	November 4, 2019

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 approved this ICR/Form.
Date IC/Form Approved by PRIV:	November 4, 2016
IC/Form PCTS Number:	1134517
Privacy Act Statement:	Choose an item. Click here to enter text.
PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) 2009</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/USCG-013 - Marine Information for Safety and Law Enforcement (MISLE), June 25, 2009 74 FR 30305</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>The DHS Privacy Office finds that the Application for Marine Event Form CG-4423 represents a privacy sensitive collection, requiring a Privacy Act Statement, as well as PIA and SORN coverage. The form, which collects information regarding marine events (blockage or interference with navigational channels or vessel traffic) in order to allow the Coast Guard to determine whether or not an event is likely to result the loss of human life if special precautions are not taken. CG Form 4423 collects the basic business contact information which may include the name, address, and phone number of any sponsor for an event or activity that may impede safe navigation on the navigable waters of the United States. PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) 2009, which assess the collection of information, including PII, associated with vessels as well as investigatory information. SORN coverage is provided by DHS/USCG-013, which outlines the Coast Guard’s collection and maintenance of records related to safety, security and law enforcement performance history of vessels, facilities, people and organizations engaged in marine transportation, including enforcement action, that can be used to identify and address safety, security and environmental risks and to establish vessel eligibility for documentation as a U.S. flag vessel. A Privacy Act statement is included within the form.</p>	