



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:	N/A
Form Title:	N/A
Component:	U.S. Coast Guard (USCG) Office: CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	National Response Resource Inventory		
OMB Control Number:	1625-0102	OMB Expiration Date:	April 30, 2017
Collection status:	Extension	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Mr. David Du Pont		
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Mr. Anthony Smith		
Office:	CG-612	Title:	PRA Coordinator
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SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

The purpose of the information collection is to improve the effectiveness of deploying response equipment in the event of an oil spill. It may also be used in the development of contingency plans.

There is no form associated with this collection. The Coast Guard maintains a Response Resource Inventory (RRI) password-protected website for users to upload Oil Spill Removal Organization (OSRO) information. The RRI contains basic business contact information which may include the name and address of an individual.

The authority for this collection is section 4202 of the Oil Pollution Act of 1990 (Pub. L. 101-380).

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 checked="" type="checkbox"/> Non-U.S. Persons. <input 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? <i>(Check all that apply.)</i>	<input type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input 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?

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<input type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link: https://cgri.uscg.mil/logon.aspx</i>
<p>e. What information will DHS collect on the form? The RRI contains basic business contact information which may include the name and address of an individual.</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><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. A Privacy Act Statement is on the RRI login webpage.</p> <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. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. The data is stored on the Coast Guard Maritime Information eXchange (CGMIX) system.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input type="checkbox"/> Manually (data elements manually entered). Please describe.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. The data is input by an OSRO, not the Coast Guard.</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 Please describe. 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. Please describe. A search can be done using OSRO-specific information.</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>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>A record is retained for the life of the OSRO; 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 CGMIX 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? <input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	
<p><input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.</p> <p><input checked="" 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.</p> <p>RRI data is shared with organizations responding to oil and hazardous materials spills; however, only equipment information is shared. The information is shared by extracts from RRI produced by the National Strike Force. Since no PII is shared, there are no special protections for the information.</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:	Robert Herrick
Date submitted to component Privacy Office:	September 27, 2017
Date submitted to DHS Privacy Office:	October 4, 2017
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. There is no CG form associated with this collection; however the webpage PAS is provided online, which will be revised accordingly.
Component Privacy Office Recommendation:	
<p>The National Response Resource Inventory collection improves the effectiveness of deploying response equipment in the event of an oil spill. It may also be used in the development of contingency plans.</p> <p>The National Response Resource Inventory collection contains basic business contact information which may include the name and address of an individual.</p> <p>This collection is covered by DHS/USCG/PIA-022 Coast Guard Maritime Information eXchange and DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE).</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Riley Dean
PCTS Workflow Number:	1151349
Date approved by DHS Privacy Office:	October 4, 2017
PTA Expiration Date	October 4, 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 type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input 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:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	No There is no form associated with this collection, so no Privacy Act Statement is required. However, USCG should work to update its notice on the Response Resource Inventory (RRI) System website.



PTA:	Choose an item.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/USCG/PIA-022 Coast Guard Maritime Information eXchange If a PIA update is required, please list: Click here to enter text.
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text. If a SORN update is required, please list: Click here to enter text.
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCG is submitting this PTA to discuss the National Response Resource Inventory information collection, which is associated with OMB Control Number 1625-0102. This collection helps improve the effectiveness of deploying response equipment in the event of an oil spill and is used in the development of contingency plans. There is no form associated with this collection. USCG maintains a Response Resource Inventory (RRI) website for users to upload Oil Spill Removal Organization (OSRO) information. The RRI contains basic business contact information (e.g., name and address of an individual) and information about the vessel/equipment. The data is stored on the Coast Guard Maritime Information eXchange (CGMIX) system. RRI data is shared with organizations responding to oil and hazardous materials spills; however, only equipment information is shared.</p> <p>The DHS Privacy Office agrees that this information collection is privacy-sensitive, noting that no PII from this collection is shared via the CGMIX.</p> <p>PIA coverage is provided by DHS/USCG/PIA-022 CGMIX, which outlines the risks of providing USCG maritime-related information to the public and facilitates information sharing to federal, state, and local governments. SORN coverage is not technically required as the information is retrieved by search using OSRO-specific information. However, DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE) does provide notice of this type of information collection.</p> <p>Additionally, USCG should update the Privacy Act Statement on the Response Resource Inventory (RRI) website to a Privacy Notice as it may be used by non-U.S. citizens who do not hold Privacy Act rights.</p>	