



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: Direct User Fees for Inspection or Examination of U.S. and Foreign Commercial Vessels

OMB Control Number:	1625-0074	OMB Expiration Date:	February 28, 2017
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Collection status:	Extension	Date of last PTA (if applicable):	N/A
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PROJECT OR PROGRAM MANAGER

Name: Mr. David Du Pont

Office:	CG-REG	Title:	Reg Dev Mgr
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name: Mr. Anthony Smith

Office:	CG-612	Title:	PRA Coordinator
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Phone:	202-475-3532	Email:	Anthony.D.Smith@uscg.mil
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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 aid the Coast Guard in managing the collection of user fees from U.S. and foreign commercial vessel owners/operators. The Coast Guard uses the information to associate a user fee payment with a specific commercial vessel.

There is no Coast Guard form associated with this collection. The records contain basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual and an email address. Vessel owner/operator data may include a Tax Identification Number. Additionally, the vessel identification number is required to ensure that the fee paid is linked to the proper vessel. The CG does not collect banking/financial information. That information is sent directly to the U.S. Treasury's pay.gov website or the financial institution that the Coast Guard identifies on our Finance Center (FINCEN) website.

The authority for this collection is 46 U.S.C. 2110.

2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII ¹)?	☒ Yes ☐ No
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	☒ Members of the public ☒ U.S. citizens or lawful permanent residents ☒ Non-U.S. Persons. ☐ DHS Employees ☐ DHS Contractors ☐ Other federal employees or contractors.
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	☒ The record subject of the form (e.g., the individual applicant). ☐ Legal Representative (preparer, attorney, etc.).

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.



	☒ Business entity. If a business entity, is the only information collected business contact information? ☒ Yes ☐ No ☐ Law enforcement. ☐ DHS employee or contractor. ☐ Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> There is no form associated with this collection.
d. How do individuals complete the form? <i>Check all that apply.</i>	☒ Paper. ☐ Electronic. (ex: fillable PDF) ☒ Online web form. (available and submitted via the internet) Links to Dept. of Treasury www.PAY.gov online forms via https://www.fincen.uscg.mil/VIF.htm
e. What information will DHS collect on the form? The records contain basic business contact information which may include the phone number, email address and name and address of the vessel owner/operator, if owned/operated by an individual. Vessel owner/operator data may include a Tax Identification Number. Additionally, the vessel identification number is required to ensure that the fee paid is linked to the proper vessel.	
f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? Yes.	
☐ Social Security number ☐ Alien Number (A-Number) ☒ Tax Identification Number ☐ Visa Number ☐ Passport Number ☐ Bank Account, Credit Card, or other financial account number ☐ Other. <i>Please list:</i>	☐ DHS Electronic Data Interchange Personal Identifier (EDIPI) ☐ Social Media Handle/ID ☐ Known Traveler Number ☐ Trusted Traveler Number (Global Entry, Pre-Check, etc.) ☐ Driver's License Number ☐ Biometrics



g. List the <i>specific authority</i> to collect SSN or these other SPII elements. Debt Collection Improvement Act of 1996	
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. The collection of SPII is essential to ensure that the payee is properly credited with making a user fee payment.	
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>)?	☐ Yes. Please describe how notice is provided. Click here to enter text. ☒ No.

3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	☐ Paper. Please describe. Click here to enter text. ☒ Electronic. Please describe the IT system that will store the data from the form. The inspector's notes, etc. regarding the inspection that the Coast Guard receives are maintained in Marine Information for Safety and Law Enforcement (MISLE) database. Initially, the payment amount and receipt number are entered into the Core Accounting Suite (CAS). ☐ Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.
b. If electronic, how does DHS input the responses into the IT system?	☒ Manually (data elements manually entered). Please describe. The amount and receipt number of vessel-specific user fee payment is manually entered into a CG IT system—the CAS. Once entered, the CAS-MISLE database record



	updates are performed manually via an interface. ☐ Automatically. Please describe. Click here to enter text.
c. How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?	☐ 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. ☒ By a non-personal identifier. <i>Please describe.</i> A search can be done using vessel-specific information.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	A record is retained for the life of the vessel; NARA retention schedule number N1-026-05-015.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	Disposal/deletion of CAS and MISLE data, are in accordance with the business rules for each database.
f. Is any of this information shared outside of the original program/office? ☒ No. Information on this form is not shared outside of the collecting office.	
☐ Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text. ☐ Yes, information is shared <i>external</i> to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.	

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.



Homeland
Security

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
www.dhs.gov/privacy



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:	October 5, 2018
Date submitted to DHS Privacy Office:	October 17, 2018
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>)	☐ Yes. Please include it with this PTA submission. ☒ No. Please describe why not. There is no form associated with this collection.
Component Privacy Office Recommendation:	
The purpose of the Direct User Fees for Inspection or Examination of U.S. and Foreign Commercial Vessels information collection is to aid the Coast Guard in managing the collection of user fees from U.S. and foreign commercial vessel owners/operators. The Coast Guard uses the information to associate a user fee payment with a specific commercial vessel. The CG does not collect banking/financial information. That information is sent directly to the U.S. Treasury's pay.gov website or the financial institution that the Coast Guard identifies on our Finance Center (FINCEN) website. The records contain basic business contact information which may include the phone number, email address and name and address of the vessel owner/operator, if owned/operated by an individual. Vessel owner/operator data may include a Tax Identification Number. Additionally, the vessel identification number is required to ensure that the fee paid is linked to the proper vessel. This collection is covered by DHS/USCG/PIA-009, DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) and DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE).	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Riley Dean
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	December 7, 2018
PTA Expiration Date	December 7, 2021

DESIGNATION

Privacy Sensitive IC or Form:	Yes. If “no” PTA adjudication is complete.
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ DHS Policy for Computer-Readable Extracts Containing SPII applies. ☐ Privacy Act Statement required. ☒ Privacy Impact Assessment (PIA) required. ☒ System of Records Notice (SORN) required. ☐ Specialized training required. ☐ 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:	Choose an item. Click here to enter text.
PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA If covered by existing PIA, please list: DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) DHS/USCG/PIA-009 Core Accounting Suite If a PIA update is required, please list: Click here to enter text.
SORN:	System covered by existing SORN If covered by existing SORN, please list: DHS/ALL-008 Accounts Receivable System of Records September 28, 2015, 80 FR 58289 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>	
USCG is submitted this PTA to discuss the Direct User Fees for Inspection or Examination of U.S. and Foreign Commercial Vessels information collection, which is associated with OMB Control Number 1625-0074. The purpose of the information collection is to aid USCG in managing the collection of user fees from U.S. and foreign commercial vessel owners/operators. The Coast Guard uses the information to associate a user fee payment with a specific commercial vessel. 46 U.S.C. 2110 requires the collection of user fees for USCG inspection services. In order to do this, USCG must have certain minimal information to credit payments to specific vessels. If the required information and payment of fees is not provided, USCG may not be able to determine which vessel the payment is for, or resolve problems if discrepancies occur, such as out of balances, overpayments, underpayments, and payments returned due to insufficiency of funds. The USCG does not collect banking/financial information. There is no Coast Guard form associated with this collection. U.S. Treasury forms are used outside of the USCG information collection to process these user fees. That information is sent directly to www.PAY.gov or the financial institution that the USCG identifies on our Finance Center website https://www.fincen.uscg.mil/VIF.htm. The banking information is received by the US Treasury and the USCG can view limited information like payment amount and information in comment fields. What USCG does collect includes information to ensure that the fee paid is linked to the	



proper vessel. For example, records contain basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual and an email address. Vessel owner/operator data may also include a Tax Identification Number. Records are initially entered into the Core Accounting Suite (CAS); but again, no financial/banking information is entered into CAS. Generally, the amount and a receipt number that is provided by U.S. Treasury (which does not relate to any account numbers) are shared to ensure that USCG can affirm that a vessel paid the required fees. The inspector's notes regarding the inspection are maintained in the Marine Information for Safety and Law Enforcement (MISLE) database.

The DHS Privacy Office finds that this information collection is privacy-sensitive, requiring PIA and SORN coverage.

PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) and DHS/USCG/PIA-009 Core Accounting Suite. SORN coverage is provided by DHS/ALL-008 Accounts Receivable System of Records.

Although U.S. Treasury forms are used for the payment function, those forms do include the USCG logo. Therefore, the DHS Privacy Office advised that USCG should work with U.S. Treasury to ensure those forms are adequate, including whether a Privacy Act Statement or Privacy Notice should be added.