



## 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](mailto: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.

<b>Form Number:</b>	CG-4509
<b>Form Title:</b>	APPLICATION FOR REGISTRATION AS UNITED STATES REGISTERED PILOT
<b>Component:</b>	U.S. Coast Guard (USCG) Office: CG-WWM

#### IF COVERED BY THE PAPERWORK REDUCTION ACT:

<b>Collection Title:</b>	Great Lakes Pilotage		
<b>OMB Control Number:</b>	1625-0086	<b>OMB Expiration Date:</b>	December 31, 2016
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	N/A

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Vincent F. Berg		
<b>Office:</b>	CG-WWM-2	<b>Title:</b>	Transportation Specialist
<b>Phone:</b>	202-372-1535	<b>Email:</b>	vincent.f.berg@uscg.mil

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Vincent F. Berg		
<b>Office:</b>	CG-WWM-2	<b>Title:</b>	Transportation Specialist



**Phone:** 202-372-1535 **Email:** vincent.f.berg@uscg.mil

## SPECIFIC IC/Forms PTA QUESTIONS

### 1. Purpose of the Information Collection or Form

The Coast Guard will use this information to review mariner credentials and qualifications against eligibility requirements for providing registered pilotage on the Great Lakes.

Coast Guard authorities to collect this information are 46 U.S.C. §9303 and 46 CFR §401.210.

### 2. Describe the IC/Form

<b>a.</b> Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>b.</b> From which type(s) of individuals does this form collect information? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <input type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons. <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
<b>c.</b> Who will complete and submit this form? (Check all that apply.)	<input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input type="checkbox"/> Business entity. <p style="margin-left: 40px;">If a business entity, is the only information collected business contact information?</p>

<sup>1</sup> 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"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> <a href="#">Click here to enter text.</a>
<p><b>d.</b> How do individuals complete the form? <i>Check all that apply.</i></p>	<input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i>
<p><b>e.</b> What information will DHS collect on the form?</p>	
<p>Name, mailing address, email, phone number, document number, and reference number.</p>	
<p><b>f.</b> Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply.</i></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 checked="" type="checkbox"/> Other. <i>Please list: Document number, Reference Number</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><b>g.</b> List the <i>specific authority</i> to collect SSN or these other SPII elements.</p>	
<p>46 U.S.C. §9303 and 46 CFR §401.210.</p>	



<p><b>h.</b> 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>The purpose of the collection form CG-4509 is to carry out operational and rate making oversight of pilotage activities on the Great Lakes.</p>	
<p><b>i.</b> 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.</p> <p>Privacy Act Statement is posted on the bottom of CG-Form 4509.</p>

3. How will DHS store the IC/form responses?	
<p><b>a.</b> How will DHS store the original, completed IC/forms?</p>	<p><input checked="" type="checkbox"/> Paper. Please describe. The forms will be stored in a locked file cabinet in a level 5 secure building.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. <a href="#">Click here to enter text.</a></p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. The CG also keeps the application in CG-WWM-2 shared drive with the pilots files.</p>
<p><b>b.</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. The CG scans the hand written application into CG-WWM-2 shared folder.</p> <p><input type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a></p>



<p><b>c.</b> How would a user search the information submitted on the forms, <i>i.e.</i>, how is the information retrieved?</p>	<p><input checked="" type="checkbox"/> By a unique identifier.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. By the pilots name. The Privacy Act Statement is on the bottom of Form CG-4509.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Click here to enter text.</p>
<p><b>d.</b> What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Destroy 6 years after the individual license expires, upon death of the individual or when the individual turns 70 years old, whichever is sooner; NARA retention schedule number N1-026-05-2.</p>
<p><b>e.</b> How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Records are disposed of in accordance Great Lakes Registered Pilot and Applicant Pilot Eligibility Records retention schedule.</p>
<p><b>f.</b> 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 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. The CG-4509 Application for Registered Pilot is shared with the three pilot district associations, Saint Lawrence Seaway Pilots' Association, Lakes Pilots Association, &amp; Western Great Lakes Pilots Association, the Coast Guard regulates. After the CG determines the individual meets all the requirements in accordance with the regulations, the pilot associations hire the individuals based on the application.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	

<sup>2</sup> 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.



**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)

<b>Component Privacy Office Reviewer:</b>	Kenlinishia Tyler
<b>Date submitted to component Privacy Office:</b>	October 6, 2016
<b>Date submitted to DHS Privacy Office:</b>	November 1, 2016
<b>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>)</b>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. The form has been in previous existence. A Privacy Act Statement can be found at the bottom of the form.
<b>Component Privacy Office Recommendation:</b>	
<i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
CG-Form 4509 (i.e. Application for Registration as United States Registered Pilot) is a privacy sensitive form used to document credentials/qualifications for an original or renewal registered pilot license.	
DHS/USCG/PIA-015 and DHS/USCG-006 provides coverage for this collection.	





## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Michael Capparra</b>
<b>PCTS Workflow Number:</b>	1134659
<b>Date approved by DHS Privacy Office:</b>	November 8, 2016
<b>PTA Expiration Date</b>	November 8, 2019

### DESIGNATION

<b>Privacy Sensitive IC or Form:</b>	<b>Yes. If "no" PTA adjudication is complete.</b>
<b>Determination:</b>	<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.
<b>DHS IC/Forms Review:</b>	Choose an item.
<b>Date IC/Form Approved by PRIV:</b>	Click here to enter a date.
<b>IC/Form PCTS Number:</b>	Click here to enter text.
<b>Privacy Act Statement:</b>	Choose an item. The current PA statement included on the form is sufficient.
<b>PTA:</b>	Choose an item. The PTA currently on file with PRIV is sufficient.



<b>PIA:</b>	<p><b>System covered by existing PIA</b>          If covered by existing PIA, please list: DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System 2011          If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
<b>SORN:</b>	<p><b>System covered by existing SORN</b>          If covered by existing SORN, please list: DHS/USCG-006 Great Lakes Registered Pilot and Applicant Pilot Eligibility, December 16, 2014, 79 FR 74744          If a SORN update is required, please list: <a href="#">Click here to enter text.</a></p>
<p><b>DHS Privacy Office Comments:</b>  <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>The DHS Privacy Office finds that the Application for Registration as United States Registered Pilot Form represents a privacy sensitive collection of information. The Form collects contact and license information from individuals in order to compare their mariner credentials and qualifications against the eligibility requirements for providing registered pilotage on the Great Lakes. A Privacy Act Statement outlining the authorities, reason for collection, and uses of information is provided on the form. PIA coverage is provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System, which assess the use of PII from members of the public as part of its effort to manage the issuance of credentials to Merchant Mariners and process merchant mariner applications; produce merchant mariner credentials; and track merchant mariner credentials issued by the Coast Guard. SORN coverage is provided by DHS/USCG-006 Great Lakes Registered Pilot and Applicant Pilot Eligibility, which outlines the Coast Guard’s collection of information in order to assist USCG in meeting its statutory obligation to establish, regulate, and oversee the operations of a pilotage system on the Great Lakes, to maintain records of individuals who are registered as Great Lakes pilots to perform pilotage duties aboard foreign trade vessels on the Great Lakes, and to maintain applications of mariners seeking registration as a Great Lakes pilot.</p>	