



## 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.

---

**Form Number:** TSA Form 1604

---

**Form Title:** Critical Facility Security Review (CFSR)  
**Component:** Transportation Security Administration (TSA)      **Office:** Office of Security Policy & Industry Engagement (OSPIE) – Surface Division

---

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

---

**Collection Title:** Critical Facility Information of the Top 100 Most Critical Pipeline

---

OMB Control Number:	1652-0050	OMB Expiration Date:	April 30, 2018
Collection status:	Extension	Date of last PTA (if applicable):	N/A

---

**PROJECT OR PROGRAM MANAGER**

---

<b>Name:</b>	Steven Froehlich	<b>Title:</b>	Transportation Security Specialist
<b>Office:</b>	OSPIE Surface Division	<b>Email:</b>	Steven.froehlich@tsa.dhs.gov
<b>Phone:</b>	571-227-1240		

---

**COMPONENT INFORMATION COLLECTION/FORMS CONTACT**

---

<b>Name:</b>	Glenn Stoll	<b>Title:</b>	IMPS Director, Forms Management Officer
<b>Office:</b>	Information Management Program Section (IMPS)	<b>Email:</b>	Glenn.stoll@tsa.dhs.gov
<b>Phone:</b>	571-227-5175		



## SPECIFIC IC/Forms PTA QUESTIONS

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

a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*

*If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.*

**TSA visits critical pipeline facilities to collect site-specific information from pipeline operators on facility security policies, procedures, and physical security measures. TSA analyzes the information collected on the CFSR form during the onsite facility reviews, as well as the information collected from follow-ups with facility operators on the status of recommendations made during the reviews to determine: strengths and weaknesses at the nation's critical pipeline facilities; areas to target for risk reduction strategies; pipeline industry implementation of the TSA "Pipeline Security Guidelines;" and operator implementation of recommendations made during TSA critical facility visits.**

b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

**Section 1557 of the 9/11 Act ((P.L. 110-53, 121 Stat. 266, 475 (August 3, 2007) codified at 6 USC 1207(b)) requires that TSA develop and implement a plan for reviewing pipeline security plans and inspecting critical pipeline systems.**

### 2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII<sup>1</sup>)?

- Yes  
 No

b. From which type(s) of individuals does this form

- Members of the public  
 U.S. citizens or lawful permanent residents

<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.



<p>collect information? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> Non-U.S. Persons.</p> <p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input type="checkbox"/> Other federal employees or contractors.</p>
<p>c. Who will complete and submit this form? <i>(Check all that apply.)</i></p>	<p><input 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 checked="" type="checkbox"/> Business entity.</p> <p style="padding-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="padding-left: 80px;"><input checked="" type="checkbox"/> Yes</p> <p style="padding-left: 80px;"><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input checked="" type="checkbox"/> DHS employee or contractor.</p> <p><input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i></p> <p>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 type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p>
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>	
<p><b>Pipeline operator's name, official title and business contact information: office and cellular phone numbers, email address.</b></p>	
<p>f. 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 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	
g. List the <b>specific authority</b> to collect SSN or these other SPII elements.			
N/A			
h. How will this information be used? What is the purpose of the collection? Describe <b>why</b> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.			
N/A			
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> )?		<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. Operators receive a copy of the form in advance of inspection to review and complete if they choose. <input type="checkbox"/> No.	

3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input type="checkbox"/> Paper. Please describe. Click here to enter text. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. The data and electronic copies of the final forms are maintained in an Access database on a government-provided stand-alone computer



	<p>accessible only to personnel contracted by TSA to perform the inspections. All pipeline facility information on the form and in the database are considered Sensitive Security Information (SSI) and protected accordingly.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.</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. After inspection, the contractor enters the form information into the database.</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.<sup>2</sup> <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> Information is retrieved by company and/or facility names.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>In accordance with NARA Authority N1-560-11-2, Item 1, and TSA Records Disposition Schedule 1600.4, Surface Mode Assessment records are cut off at the end of the fiscal year, then destroyed/deleted seven years after cut-off.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with</p>	<p>Records are reviewed at the end of each FY to identify any no longer needed for analysis or business purpose that have been maintained for seven years from the cut-off date. These records are then destroyed or deleted.</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.



the retention schedule?	
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>	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. <a href="#">Click here to enter text.</a>  <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. <a href="#">Click here to enter text.</a>  <input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office.	



**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:	<b>Jennifer L. Schmidt</b>
Date submitted to component Privacy Office:	<b>November 29, 2017</b>
Date submitted to DHS Privacy Office:	Click here to enter a date.
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. Not Privacy Act protected records.
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>	
<b>TSA Privacy recommends approval of this PTA. The collection of business PII from members of the public has PIA coverage under DHS/ALL/PIA-006, DHS General Contacts Lists. SORN coverage is not required because the records are not protected by the Privacy Act or retrieved by a unique personal identifier.</b>	





## PRIVACY THRESHOLD ADJUDICATION

**(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)**

DHS Privacy Office Reviewer:	<b>Sean McGuinness</b>
PCTS Workflow Number:	<b>1154464</b>
Date approved by DHS Privacy Office:	<b>December 1, 2017</b>
PTA Expiration Date	<b>December 1, 2020</b>

### DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes If "no" PTA adjudication is complete.</b>
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:	DHS PRIV has not received this ICR/Form.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	<b>e(3) statement not required.</b> Click here to enter text.
PTA:	<b>No system PTA required.</b> Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: <b>DHS/ALL/PIA-006 General Contact Lists</b></p> <p>If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>Choose an item.</p> <p>If covered by existing SORN, please list: Click here to enter text.</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p><b>DHS Privacy Office finds that the Critical Facility Security Review (CFSR) TSA Form 1604 is privacy sensitive as it collects PII from members of the public (including U.S. citizens or lawful permanent residents and Non-U.S. Persons.</b></p> <p><b>TSA uses Form 1604 to collect site-specific information from pipeline operators on facility security policies, procedures, and physical security measures during a TSA visit to a critical pipeline facility. This information is collected to determine strengths and weaknesses at the nation's critical pipeline facilities; areas to target for risk reduction strategies; pipeline industry implementation of the TSA "Pipeline Security Guidelines;" and operator implementation of recommendations made during TSA critical facility visits. PII submitted on this form includes the pipeline operator's name and business contact information (office and cellular phone numbers and email address).</b></p> <p><b>PRIV agrees with TSA Privacy that PIA coverage is provided under DHS/ALL/PIA-006 General Contact Lists. DHS/ALL/PIA-006 outlines how DHS collects contact information in order to distribute information and perform various other administrative tasks.</b></p> <p><b>A Privacy Act Statement is not required as information on this form is not retrieved by personal identifier. Information is retrieved by company and/or facility names.</b></p>	