



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.



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

The purpose of the form is to certify that a vessel meets safety requirements. These requirements apply to certain vessels engage in commerce. The Coast Guard issues certificates as proof of compliance with the requirements.

CG Form 854 contains basic business contact information which may include the name and address of the vessel owner if owned by an individual.

The authority for the issuance of this form is 46 U.S. Code 3305 and 3306.

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. <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 type="checkbox"/> Business entity. <p style="margin-left: 40px;">If a business entity, is the only information collected business contact information?</p> <input type="checkbox"/> Yes

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"/> No <input type="checkbox"/> Law enforcement. <input checked="" type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<input checked="" type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i>
<p>e. What information will DHS collect on the form?</p>	
<p>Basic business contact information (i.e. vessel characteristics, name/address of ship owner, and signature of USCG official).</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 type="checkbox"/> Yes. Please describe how notice is provided. Click here to enter text.</p> <p><input checked="" 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 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. Forms that the Coast Guard creates are maintained in Marine Information for Safety and Law Enforcement (MISLE) database.</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. A scanned form is uploaded into the vessel-specific file in MISLE.</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</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>

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.



forms, <i>i.e.</i> , how is the information retrieved?	<input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> A search is accomplished 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?	As records are maintained in the MISLE database, disposal/deletion is in accordance with the business rules for the database.
f. Is any of this information shared outside of the original program/office?	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text. <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. <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:	Kenlinishia Tyler
Date submitted to component Privacy Office:	March 13, 2017
Date submitted to DHS Privacy Office:	April 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. Form/certificate is an administrative document completed by a USCG official and does not collect information directly from an individual. The Marine Information for Safety and Law Enforcement (MISLE) is the data repository for this information.
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 854 (Temporary Certificate of Inspection) is a certificate used to certify that a vessel meets safety requirements.</p> <p>Authorized USCG officials populate this certificate with vessel characteristics, name/address of ship owner, and signature of USCG official. Vessel characteristics and name/address of ship owner are retained and retrieved from the Marine Information for Safety and Law Enforcement (MISLE) system.</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:	1141497
Date approved by DHS Privacy Office:	4/10/17
PTA Expiration Date	4/10/20

DESIGNATION

Privacy Sensitive IC or Form:	Choose an item. 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 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:	Choose an item. Click here to enter text.
PTA:	No system PTA required.



	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) 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/USCG-013 - Marine Information for Safety and Law Enforcement (MISLE) 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>The DHS Privacy Office finds that CG-854 (Temporary Certificate of Inspection) is a privacy-sensitive collection. The Temporary Certificate of Inspection is used to certify that a vessel meets safety requirements to engage in commerce. The form collects business contact information, which may include the name and address of the vessel owner, if it is owned by an individual.</p> <p>The Privacy Office finds that PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE), which assess the privacy risks associated with the Coast Guard’s use of PII in support of marine safety, security, environmental protection and law enforcement programs. PRIV also finds that SORN coverage is provided by DHS/USCG-013 - Marine Information for Safety and Law Enforcement (MISLE), which outlines the Coast Guard’s collection and maintenance of information in order to establish a 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.</p>	