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

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.

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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:	CG-948

Form Title:	Permit to Proceed to Another Port for Repairs

Component:	U.S. Coast Guard (USCG)	Office:	CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Small Passenger Vessels –- Title 46 CFR Subchapters K and T

OMB Control Number:	1625-0057	OMB Expiration Date:	July 31, 2017
Collection status:	Extension	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Mr. David Du Pont		
Office:	CG-REG	Title:	Reg Dev Mgr
Phone:	202-372-1497	Email:	David.A.DuPont@uscg.mil

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Mr. Arthur Requina		
Office:	CG-612	Title:	Forms Manager
Phone:	202-475-3651	Email:	Arthur.A.Requina@uscg.mil

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SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form
The purpose of the form is to certify that a vessel is safe to travel to another port for repairs. The Coast Guard issues permit. CG Form 948 contains vessel-specific information--not PII. 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])?	☐ Yes ☒ No

b. From which type(s) of individuals does this form collect information? (*Check all that apply*.)	☐ 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? (*Check all that apply*.)	☐ The record subject of the form (e.g., the individual applicant).
	☐ Legal Representative (preparer, attorney, etc.).
	☐ Business entity.
	    If a business entity, is the only information collected business contact information?
	        ☐ Yes
	        ☐ No
	☐ Law enforcement.

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[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.

	☒ DHS employee or contractor. ☐ Other individual/entity/organization **that is NOT the record subject**. *Please describe.* Click here to enter text.
d. How do individuals complete the form? *Check all that apply.*	☐ Paper. ☐ Electronic. (ex: fillable PDF) ☐ Online web form. (available and submitted via the internet) *Provide link:*

e. What information will DHS collect on the form? This form does not collect PII.
N/A.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No.

☐ Social Security number ☐ Alien Number (A-Number) ☐ Tax Identification Number ☐ Visa Number ☐ Passport Number ☐ Bank Account, Credit Card, or other financial account number ☐ Other. *Please list:*	☐ 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 *specific authority* 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 *why* 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 (*Does the records*	☐ Yes. Please describe how notice is provided. Click here to enter text. ☒ No.

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	subject have notice of the collection or is form filled out by third party)?	

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. Click here to enter text. ☒ 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.
b.	If electronic, how does DHS input the responses into the IT system?	☒ Manually (data elements manually entered). Please describe. A scanned form is uploading to the vessel-specific file in MISLE. ☐ Automatically. Please describe. Click here to enter text.
c.	How would a user search the information submitted on the forms, *i.e.*, how is the information retrieved?	☐ 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. ☒ By a non-personal identifier. *Please describe.* A search is accomplished using vessel specific information.
d.	What is the records	A record is retained for the life of the vessel; NARA

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[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.

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	retention schedule(s)? *Include the records schedule number.*	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?	

☐ Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.

☐ Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe. Click here to enter text.

☒ No. Information on this form is not shared outside of the collecting office.

Please include <u>a copy of the referenced form and Privacy Act Statement</u> (if applicable) with this PTA upon submission.

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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? (*Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements***.)**	☐ Yes. Please include it with this PTA submission. X No. Please describe why not. CG-948 is not privacy sensitive.

Component Privacy Office Recommendation:
Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.

CG Form 948 (Permit to Proceed to Another Port for Repairs) is a permit that certifies that a vessel is safe to travel to another port for repairs and is not privacy sensitive. However, a copy of this form will be maintained in the vessel specific file within the CG Marine Information for Safety Law Enforcement system.

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PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Michael Capparra
PCTS Workflow Number:	1141496
Date approved by DHS Privacy Office:	4/10/17
PTA Expiration Date	4/10/20

DESIGNATION

Privacy Sensitive IC or Form:	No 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:	No system PTA required.

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	Click here to enter text.
PIA:	Choose an item. If covered by existing PIA, please list: Click here to enter text. 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: ***Please describe rationale for privacy compliance determination above.***	
The DHS Privacy Office finds that CG Form 948 (Permit to Proceed to Another Port for Repairs) is a non privacy-sensitive collection. The form is used to certify that a vessel is safe to travel to another port for repairs and contains vessel-specific information. No PII is collected.	