



## 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:	USCGA-AIM2		
Form Title:	Academy Introduction Mission (AIM) Scholarship Request Form		
Component:	U.S. Coast Guard (USCG)	Office:	USCGA Admissions

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

Collection Title:	United States Coast Guard Academy Introduction Mission Program Application and Supplemental Forms		
OMB Control Number:	1625-0121	OMB Expiration Date:	February 28, 2018
Collection status:	New Collection	Date of last PTA (if applicable):	N/A

#### **PROJECT OR PROGRAM MANAGER**

Name:	LT Alexander Eames		
Office:	USCGA Admissions	Title:	Campus Programs Manager
Phone:	860-701-6395	Email:	Alexander.g.eames@uscga.edu

#### **COMPONENT INFORMATION COLLECTION/FORMS CONTACT**

Name:	Anthony Smith		
Office:	CG-612	Title:	PRA Coordinator
Phone:	202-475-3532	Email:	Anthony.D.Smith@uscg.mil



## SPECIFIC IC/Forms PTA QUESTIONS

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

The purpose of this form is for students accepted to and attending the summer AIM program the ability to request needs-based financial assistance or a scholarship to attend. The form will require parents to provide family financial information to best determine if they qualify for travel or tuition assistance.

This information is used to determine eligibility for financial assistance or a scholarship to attend the US Coast Guard Academy for the week long AIM program, a one-week summer orientation which allows select rising high school seniors to experience cadet life at the USCGA and is designed to recruit the future Officers of the US Coast Guard.

The authority to operate the United States Coast Guard Academy (USCGA) is contained in 14 USC 181. The regulation and administration of the USCGA is the responsibility of the Superintendent, subject to the direction of the Commandant of the Coast Guard under the general supervision of the Secretary of Homeland Security. One of the Superintendent’s responsibilities is to ensure that eligible individuals from the public at large have every opportunity to visit and learn about the USCGA.

### 2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" 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? (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.

<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>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.  <input type="checkbox"/> DHS employee or contractor.  <input checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i>      Parent/Legal Guardian.</p>																
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<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>																
<p>e. What information will DHS collect on the form?        Applicant: Name, address, phone number, date of birth, gender, email address, and financial income information.        Parent/Legal Guardian: Name, phone number, date of birth, gender, email address, and financial income information.</p>																	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? Yes.</p>																	
<table border="0"> <tr> <td><input type="checkbox"/> Social Security number</td> <td><input type="checkbox"/> DHS Electronic Data Interchange</td> </tr> <tr> <td><input type="checkbox"/> Alien Number (A-Number)</td> <td>Personal Identifier (EDIPI)</td> </tr> <tr> <td><input type="checkbox"/> Tax Identification Number</td> <td><input type="checkbox"/> Social Media Handle/ID</td> </tr> <tr> <td><input type="checkbox"/> Visa Number</td> <td><input type="checkbox"/> Known Traveler Number</td> </tr> <tr> <td><input type="checkbox"/> Passport Number</td> <td><input type="checkbox"/> Trusted Traveler Number (Global</td> </tr> <tr> <td><input type="checkbox"/> Bank Account, Credit Card, or other financial account number</td> <td>Entry, Pre-Check, etc.)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Other. <i>Please list:</i> Financial information from the parent.</td> <td><input type="checkbox"/> Driver's License Number</td> </tr> <tr> <td></td> <td><input type="checkbox"/> Biometrics</td> </tr> </table>		<input type="checkbox"/> Social Security number	<input type="checkbox"/> DHS Electronic Data Interchange	<input type="checkbox"/> Alien Number (A-Number)	Personal Identifier (EDIPI)	<input type="checkbox"/> Tax Identification Number	<input type="checkbox"/> Social Media Handle/ID	<input type="checkbox"/> Visa Number	<input type="checkbox"/> Known Traveler Number	<input type="checkbox"/> Passport Number	<input type="checkbox"/> Trusted Traveler Number (Global	<input type="checkbox"/> Bank Account, Credit Card, or other financial account number	Entry, Pre-Check, etc.)	<input checked="" type="checkbox"/> Other. <i>Please list:</i> Financial information from the parent.	<input type="checkbox"/> Driver's License Number		<input type="checkbox"/> Biometrics
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	<input type="checkbox"/> Biometrics																
<p>g. List the <b>specific authority</b> to collect SSN or these other SPII elements.</p>																	



USCG has the authority to collect this information in order to administer the Coast Guard Academy under 14 U.S.C § § 181-200.

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.  
Financial information will be used only for the purpose of determining financial aid eligibility for U.S. Coast Guard Admissions Programs.

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. Privacy Act statement on the form.  <input type="checkbox"/> No.
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### 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. Academy Information System (ACADIS) secure unclassified .edu network <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. ACADIS secure unclassified .edu network
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b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Data from the application will be reviewed by USCGA personnel.  <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
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<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 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. Name</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records are destroyed immediately following the conclusion of the program.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Program manager personally destroys the record by USCG approved means after use.</p>
<p>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></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 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.</p> <p><input checked="" 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.



**Homeland  
Security**

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, pia@hq.dhs.gov  
[www.dhs.gov/privacy](http://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:	June 20, 2017
Date submitted to DHS Privacy Office:	June 27, 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 checked="" type="checkbox"/> Yes. Please include it with this PTA submission. USCG Privacy will work with the program to update the PAS with SORNs authorized for this collection. <input type="checkbox"/> No. Please describe why not. <a href="#">Click here to enter text.</a>
Component Privacy Office Recommendation:	
<p>The Academy Introduction Mission (AIM) Scholarship Request Form provides for students accepted to and attending the summer AIM program the ability to request needs-based financial assistance or a scholarship to attend. The form will require parents to provide family financial information to best determine if they qualify for travel or tuition assistance.</p> <p>The AIM Scholarship Request Form collects name, address, phone number, date of birth, gender, and financial income information from the student and name, phone number, date of birth, gender, and financial income information from the Parent/Legal Guardian.</p> <p>DHS/USCG/PIA-013, DHS/USCG-014 and DHS/USCG-027 provide coverage for this collection.</p>	





## PRIVACY THRESHOLD ADJUDICATION

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

DHS Privacy Office Reviewer:	<b>Riley Dean</b>
PCTS Workflow Number:	<b>1145860</b>
Date approved by DHS Privacy Office:	October 4, 2017
PTA Expiration Date	October 4, 2020

### 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 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.
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:	<b>e(3) statement update is required.</b> USCG should complete an updated Privacy Notice for this form.
PTA:	Choose an item. Click here to enter text.
PIA:	<b>System covered by existing PIA</b>



	<p>If covered by existing PIA, please list: DHS/USCG/PIA-013 Academy Information System DHS/USCG/PIA-009 Core Accounting Suite If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
SORN:	<p><b>System covered by existing SORN</b> If covered by existing SORN, please list: DHS/USCG-027 Recruiting Files, August 10, 2011 76 FR 49494 DHS/USCG-014 Military Pay and Personnel, October 28, 2011 76 FR 66933 If a SORN update is required, please list: <a href="#">Click here to enter text.</a></p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p><b>USCG is submitting this PTA to discuss Form USCGA-AIM2, Academy Introduction Mission (AIM) Scholarship Request Form, which is part of OMB control number 1625-0121. The AIM program is a one-week summer orientation which allows select rising high school seniors to experience cadet life at the U.S. Coast Guard Academy and is designed to recruit the future personnel. This information gathered from this form provides for students accepted to and attending the summer AIM program the ability to request needs-based financial assistance or a scholarship to attend. The form requires parents to provide family financial information to best determine if they qualify for travel or tuition assistance.</b></p> <p><b>The form collects the student’s name, gender, date of birth, address, phone number, and financial income information. It also collects parent/legal guardian’s name, phone number, date of birth, gender, and financial income information. The information from the form is stored in the Academy Information System (ACADIS), and retrieved by the student’s name. Information on this form is stored in the Academy Information System (ACADIS) and is not shared outside of the collecting office. All information is destroyed immediately following the conclusion of the summer program.</b></p> <p><b>The DHS Privacy Office finds that PIA and SORN coverage are required for this information collection.</b></p> <p><b>PIA coverage for the information is provided by DHS/USCG/PIA-013 Academy Information System (AIS), which describes the Academy information system (ACADIS) transactional database system that provides an information resource for</b></p>	



**the management of the academy educational environment, including the training and development of all future Coast Guard officers. PIA coverage for the collection of financial information is provided by DHS/USCG/PIA-009 Core Accounting Suite, which outlines risks of using an integrated financial and asset management system at USCG. SORN coverage is provided by DHS/USCG-014 Military Pay and Personnel and DHS/USCG-027 Recruiting Files.**

**The DHS Privacy Office recommends that USCG work with the program to ensure that all of the financial data points on the form are actually needed to complete the scholarship process. Additionally, USCG should complete an updated Privacy Notice for this form.**