

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.



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: | (CGRC-1130) | | |
|--------------|-----------------------|---------------------|------------------------|
| Form Title: | United States Coast G | uard Prospect Quest | ionnaire |
| Component: | DHS | Office: Coast | Coast Guard Recruiting |
| | | Guard | Command |

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: GOCOASTGUARD.COM CHAT NOW FORM

| OMB Control | 1625-TBD | OMB Expiration | TBD |
|---------------------------|-----------|-----------------------------------|-----|
| Number: | | Date: | |
| Collection status: | Initiated | Date of last PTA (if applicable): | N/A |

PROJECT OR PROGRAM MANAGER

| Name: | Mauro Cooper | | |
|---------|------------------------|--------|---------------------------|
| Office: | Coast Guard Recruiting | Title: | Chief, Marketing Division |
| | Command | | |
| Phone: | 202-795-6823 | Email: | Mauro.A.Cooper@uscg.mil |

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

| Name: | Anthony Smith | Title: Information Collection Manager |
|---------|----------------|---------------------------------------|
| Office: | CG-611 | Email: |
| | | Anthony.D.Smith@uscg.mil |
| Phone: | (202) 475-3532 | |



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

This information is collected to identify prospective members, assess eligibility, and qualify candidates for service in the United States Coast Guard, and to manage, support, and enhance the Coast Guard's enlisted and commissioned officer recruiting mission.

The Prospect Questionnaire is the basic initial questionnaire for all prospective members except those applying to the Coast Guard Academy. It allows for the initial eligibility assessment to occur.

14 USC 468 authorizes the United States Coast Guard to recruit personnel for military service. The information requested on the gocoastguard.com web site is collected in accordance with Section 503 of Title 10, United States Code, and may only be used to identify and process individuals interested in applying for enlistment or commission in the United States Coast Guard or Coast Guard Reserve. Other legal authorities include 10 USC 504, 1475-1480; 14 USC 211, 350, 632; HSPD-12; and Executive Order 9397.

MOUs between Military Entrance Processing Command (MEPCOM) and USCG define the PII requirements for processing USCG applicants.

Records are maintained at USCG Headquarters in Washington, DC and recruiting offices.

| 2. Describe the IC/Form | |
|--|---|
| a. Does this form collect any Personally Identifiable Information" (PII¹)? | X Yes □ No |
| b. From which type(s) of individuals does this form collect information?(Check all that apply.) | Members of the publicU.S. citizens or lawful permanent residents□ Non-U.S. Persons. |

Privacy Threshold Analysis - IC/Form

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.

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| | | 🕷 DHS Employees |
|----|---|--|
| | | ☐ DHS Contractors |
| | | ☐ Other federal employees or contractors. |
| | | • • |
| | | |
| C. | Who will complete and | The record subject of the form (e.g., the |
| | submit this form? (Check | individual applicant). |
| | all that apply.) | ☐ Legal Representative (preparer, attorney, etc.). |
| | | ☐ Business entity. |
| | | If a business entity, is the only |
| | | information collected business contact |
| | | information? |
| | | □ Yes |
| | | □ No |
| | | ☐ Law enforcement. |
| | | DHS employee or contractor. |
| | | ☐ Other individual/entity/organization that is |
| | | NOT the record subject. Please describe. |
| | | Tro T the record bublect. The date describe. |
| | | |
| d. | How do individuals | 🕷 Paper. |
| | complete the form? Check | ☑ Electronic. (ex: fillable PDF) |
| | all that apply. | Online web form. (available and submitted via |
| | | the internet) |
| | | Provide link: Online web form in development. In the |
| | | interim, primary means to complete is with a fillable PDF, |
| | | but hard copies are available if needed by the applicant. |
| e. | What information will DHS of | collect on the form? |
| | Name (last, first, middle), address (country, street, city, state, zip code), e-mail, | |
| | phone number, how you heard of the Coast Guard, program and component of | |
| | interest, citizen status and alien registration number (if applicable), Social Security | |
| | and Selective Service Numbers, ethnicity and race, date of birth, age, gender, birth | |
| | | nty, city), marital status and number of dependents, |
| | | eye color, education (highest attained, current or last |
| | _ | unity activities, current or last college, degree type, |
| | major, grade point average (GPA), current education status, college credits, total | |

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years of education), current employment status, driver's license number, state, and expiration, previous contact with a recruiter, current or prior military service (including branch ware of corvice corvice obligation remaining and congration

| | date, re-enlistment code, current or last paygrade or rank, job description), whether | | | | |
|---|---|-----------------------------|--|--|--|
| | previously rejected for service, previous Armed Services Vocational Aptitude | | | | |
| | Battery (ASVAB) (if taken, when, score, location), prior criminal activity, pending | | | | |
| | | | en last used, which substances), tattoos, | | |
| | finances (history of over | rdue payments, ba | nkruptcy, child support, alimony, current | | |
| | debts), objection to carr | ying a weapon, re | igious constraints on 24/7 availability, | | |
| | fear of the water and sw | imming ability, p | articipation in various civic groups and | | |
| | chronic medical condition | ons. | | | |
| f. | Does this form collect So | ocial Security num | ber (SSN) or other element that is stand- | | |
| | alone Sensitive Persona | lly Identifiable Inf | ormation (SPII)? Check all that apply. | | |
| X | Social Security number | | \square DHS Electronic Data Interchange | | |
| X | Alien Number (A-Numbe | er) | Personal Identifier (EDIPI) | | |
| | Tax Identification Numb | er | \square Social Media Handle/ID | | |
| | Visa Number | | \square Known Traveler Number | | |
| | Passport Number | | \square Trusted Traveler Number (Global | | |
| | Bank Account, Credit Car | rd, or other | Entry, Pre-Check, etc.) | | |
| fin | ancial account number | | 🕻 Driver's License Number | | |
| X | Other. Please list: Selective | e Service | ☐ Biometrics | | |
| number | | | | | |
| | | | | | |
| | | | | | |
| g. | List the <i>specific author</i> | ity to collect SSN c | r these other SPII elements. | | |
| _ | | | C211, 350,632, Homeland Security Presidential | | |
| | ve (HSPD) 12 and Executive | | | | |
| h. How will this information be used? | | | | | |
| Data is used to make recruiting contacts with potential candidates, process candidates for aptitude | | | | | |
| testing/physical exams, background checks, assess eligibility and ultimately progress to enlistment or | | | | | |
| commissioning. Information is used to qualify enlisted and officer applicants for USCG service. Data is aggregated for analysis and used to input in the USCG's Direct Access HR system to initiate pay and | | | | | |
| | s for new members. | input in the esses s | and the control of th | | |
| i. | Are individuals | X Yes. Pleas | e describe how notice is provided. | | |
| | provided notice at the | | e / Privacy Act statement is prominently placed | | |
| | time of collection by | on collection fo | | | |
| | DHS (Does the records | □ No. | | | |

| i. | Are individuals | X Yes. Please describe how notice is provided. |
|----|------------------------|---|
| | provided notice at the | Collection notice / Privacy Act statement is prominently placed |
| | time of collection by | on collection form. |
| | DHS (Does the records | □ No. |



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

| 3. How will DHS store th | e IC/form responses? |
|---|---|
| a. How will DHS store the original, completed IC/forms? | Recruiters will store any hard copy forms in the applicant's file. I Electronic. Please describe the IT system that will store the data from the form. Fillable PDF submissions will be maintained on the CG Data Network, but are viewable only to recruiters within the Recruiting Office to which the applicant is assigned. Data will be manually in-put into USCG Direct Access. Following completion of the online web form, data will transmit automatically into Direct Access. □ Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text. |
| b. If electronic, how does DHS input the responses into the IT system? | X Manually (data elements manually entered). Please describe. CGRC personnel must input data from hard copy or fillable PDF into Direct Access. X Automatically. Web entries automatically transferred into Direct Access, pending development of online web form. |
| c. How would a user search the information | By a unique identifier. ² <i>Please describe</i> . By individual's name and zip code. Recruiters access records for specific applicants to complete application process. If |

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.

Privacy Threshold Analysis - IC/Form



| submitted on the forms, <i>i.e.</i> , how is the | information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. | |
|--|---|--|
| information retrieved? | By a non-personal identifier. <i>Please describe</i> . | |
| d. What is the records | NARA retention schedule pending: | |
| retention schedule(s)? Include the records schedule number. | Electronic data for all applicants is retained through the end of the second fiscal year after the year of collection. Data is archived off-line for an additional two years. Information on selected applicants (who are accessed) is forwarded for inclusion in the Official Military Personnel File (OMPF). | |
| | For officer applicants, hard-copy information on non-selected officer applicants is destroyed 6 months after deadline dates for the class for which application is made. Hard copy information collected for commissioning programs on selected applicants is forwarded for inclusion in OMPF and destroyed 1 year from the date of board by which considered. | |
| | For active duty enlisted applicants, Individual Personnel Applicant Records for successful and unsuccessful applicants for enlistment in the Coast Guard are destroyed 1 year after enlistment or rejection. For reserve enlisted applicants, , Individual Personnel Applicant Records for successful and unsuccessful applicants for enlistment in the Coast Guard are destroyed 2 years after enlistment or rejection. | |
| e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule? | Records are disposed or deleted in accordance with established business rules. | |
| f. Is any of this information shared outside of the original program/office? If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party? | | |
| Yes, information is shared with other DHS components or offices. Please describe. Information is shared with other DHS components or offices, including: | | |
| Internal to USCG at access: | ion points for the purposes of completing hire transactions and | |



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initiating personnel data records;

Internal to USCG with selection board members for determination of which applicants are most suitable for selection as commissioned officers.

USCG personnel at accession and initial training points also receive reports via encrypted email attachments, and as hard copy, hand carried reports and forms.

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

Data is shared with DOD (MEPCOM, Defense Manpower Data Center (DMDC)), and third party contractor performing marketing support. The data may be extracted by government personnel with Direct Access database access for official purposes.

 \square 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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

| Component Privacy Office | Kenlinishia Tyler |
|-----------------------------------|---|
| Reviewer: | |
| Date submitted to component | March 3, 2017 |
| Privacy Office: | |
| Date submitted to DHS Privacy | March 24, 2017 |
| Office: | |
| Have you approved a Privacy Act | X□ Yes. Please include it with this PTA |
| Statement for this form? (Only | submission. |
| applicable if you have received a | \square No. Please describe why not. |
| waiver from the DHS Chief Privacy | Click here to enter text. |
| Officer to approve component | |
| Privacy Act Statements.) | |
| | |

Component Privacy Office Recommendation:

The Prospect Questionnaire Instructions form (CG-1130) collects name (last, first, middle), address (country, street, city, state, zip code), e-mail, phone number, How you heard of the Coast Guard, program and component of interest, citizen status and alien registration number (if applicable), Social Security and Selective Service Numbers, ethnicity and race, date of birth, age, gender, birth location (country, state, county, city), marital status and number of dependents, height and weight, hair and eye color, education (highest attained, current or last high school, school or community activities, current or last college, degree type, major, grade point average (GPA), current education status, college credits, total years of education), current employment status, driver's license number, state, and expiration, previous contact with a recruiter, current or prior military service (including branch, years of service, service obligation remaining and separation date, re-enlistment code, current or last paygrade or rank, job description), whether previously rejected for service, previous Armed Services Vocational Aptitude Battery (ASVAB) (if taken, when, score, location), prior criminal activity, pending legal action, past drug use (how often, when last used, which substances), tattoos, finances (history of overdue payments, bankruptcy, child support an alimony, current debts), objection to carrying a weapon, religious constraints on 24/7 availability, fear of the water and swimming ability, participation in various civic groups and chronic medical conditions from members of the public and DHS employees, interested in a career in the Coast Guard.

DHS/USCG/PIA-024 (Direct Access) and DHS/USCG-014 (Military Pay and Personnel System)



provides coverage for this collection.

PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

| DHS Privacy Office Reviewer: | Click here to enter text. |
|------------------------------|-----------------------------|
| PCTS Workflow Number: | Click here to enter text. |
| Date approved by DHS Privacy | Click here to enter a date. |
| Office: | |
| PTA Expiration Date | Click here to enter a date. |

DESIGNATION

| Privacy Sensitive | e IC or | Yes. If "no" PTA adjudication is complete. | |
|----------------------|-----------------|---|--|
| Form: | | | |
| Determination: | | \square PTA sufficient at this time. | |
| | | ☐ Privacy compliance documentation determination in | |
| | | progress. | |
| | | \square 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. | |
| | | \square Other. Click here to enter text. | |
| | | | |
| DHS IC/Forms Review: | | Choose an item. | |
| | | | |
| Date IC/Form | | Click here to enter a date. | |
| Approved by PRIV: | | | |
| IC/Form PCTS | | Click here to enter text. | |
| Number: | | | |
| Privacy Act | Choose an item. | | |
| Statement: | Click h | 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-024 – Direct Access |
| | 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-014 - Military Pay and Personnel October 28, 2011 76 FR |
| | 66933 |
| | 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 the United States Coast Guard Prospect Questionnaire is a privacy sensitive collection, requiring both PIA and SORN coverage. The questionnaire collects a variety of personally identifiable information that is used to identify prospective members, assess eligibility, and qualify candidates for service in the United States Coast Guard, and to manage, support, and enhance the Coast Guard's enlisted and commissioned officer recruiting mission. Information collected includes Name (last, first, middle), address (country, street, city, state, zip code), e-mail, phone number, how you heard of the Coast Guard, program and component of interest, citizen status and alien registration number (if applicable), Social Security and Selective Service Numbers, ethnicity and race, date of birth, age, gender, etc.

The DHS Privacy Office finds that PIA coverage is provided by DHS/USCG/PIA-024 – Direct Access, which assesses the privacy risks associated with the Coast Guard's use of PII in its Direct Access system to conduct human resources and payroll functions. SORN coverage is provided DHS/USCG-014 - Military Pay and Personnel System of Records Notice, which outlines the Coast Guard's collection and maintenance of records in order to administer the USCG active duty, reserve, and retired active duty and retired reserve military pay and personnel system.