



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-1132)		
Form Title:	United States Coast Guard "Chat Now" Questionnaire.		
Component:	DHS	Office: Coast Guard	Coast Guard Recruiting Command

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	GOCOASTGUARD.COM CHAT NOW FORM		
OMB Control Number:	1625-TBD	OMB Expiration Date:	TBD
Collection status:	Initiated	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

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

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

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



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 “Chat Now” form is an online submission tool that allows for prospective applicants to chat via instant message in real time with a recruiter. These questions allow for the recruiter to have basic information about the applicant, answer questions, make an initial eligibility determination, and to contact the person in the future if they are interested in an eligible for service.

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; and HSPD-12. 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)?

- 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

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"/> Other federal employees or contractors.
<p>c. Who will complete and submit this form? (<i>Check all that apply.</i>)</p>	<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. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <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>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<input type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link: http://www.gocoastguard.com/chat-now</i>
<p>e. What information will DHS collect on the form?</p>	
<p>Name (first, middle, last,), e-mail, phone number, zip code, date of birth, gender, education level, citizenship, ethnicity, race and felony conviction or pending legal action.</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	<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.)



financial account number <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Other. <i>Please list:</i> <input type="checkbox"/> Biometrics	
g. List the <i>specific authority</i> to collect SSN or these other SPII elements.	
Legal authorities include: 10 USC 504, 1475-1480; 14 USC 211, 350, 632; and Homeland Security Presidential Directive (HSPD) 12.	
h. How will this information be used? What is the purpose of the collection?	
Data is used to make recruiting contacts with potential candidates and to answer questions regarding the Coast Guard, ranging from applicants seeking to join to members of the public seeking to learn about the Coast Guard.	
Primary purpose is to provide a potential applicant with answers about joining the Coast Guard and an initial assessment about eligibility.	
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. Collection notice / Privacy Act statement is prominently placed on collection form / website. User must acknowledge they understand CG privacy policy before they can answer any questions. <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. USCG Direct Access <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Click here to enter text.



<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. Web entries automatically transferred into Direct Access. CGRC personnel can manually edit to correct errors.</p> <p><input checked="" type="checkbox"/> Automatically. Web entries automatically transferred into Direct Access</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 checked="" type="checkbox"/> By a unique identifier.² Individual’s name and address. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p> <p>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>NARA records retention schedule pending:</p> <p>Electronic data for all applicants is retained through the end of the second fiscal year after the year of collection.</p> <p>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).</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Direct Access data base managers are responsible for records disposition IAW established business rules.</p>
<p>f. Is any of this information shared outside of the original program/office?</p>	
<p><input checked="" type="checkbox"/> 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 accession points for the purposes of completing hire transactions and initiating personnel data records; Internal to USCG with selection board members for determination of which</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.



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.

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 3, 2017
Date submitted to DHS Privacy Office:	March 24, 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. <input type="checkbox"/> No. Please describe why not. Click here to enter text.
Component Privacy Office Recommendation:	
<p>The USCG Chat Now Questionnaire collects name (first, middle, last,), e-mail, phone number, zip code, date of birth, gender, education level, citizenship, race and felony conviction or pending legal action for prospective applicants interested in joining the USCG.</p> <p>DHS/USCG/PIA-024 (Direct Access) and DHS/USCG-014 (Military Pay and Personnel System) provides coverage for this collection.</p>	



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 Office:	Click here to enter a date.
PTA Expiration Date	Click here to enter a date.

DESIGNATION

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



	Click here to enter text.
PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list: DHS/USCG/PIA-024 – Direct Access</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list: DHS/USCG-014 - Military Pay and Personnel October 28, 2011 76 FR 66933</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
DHS Privacy Office Comments:	
<i>Please describe rationale for privacy compliance determination above.</i>	
<p>The DHS Privacy Office finds that the United States Coast Guard “Chat Now” Questionnaire is a privacy sensitive collection, requiring both PIA and SORN coverage. The questionnaire collects a variety of name (first, middle, last,), e-mail, phone number, zip code, date of birth, gender, education level, citizenship, race, and felony conviction or pending legal action. These information is collected in order to allow a recruiter to have basic information about the applicant, answer questions, make an initial eligibility determination, and to contact the person in the future if they are interested in an eligible for service.</p> <p>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.</p>	