



## 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.

<b>Form Number:</b>	CG-718A		
<b>Form Title:</b>	Certificate of Discharge to Merchant Mariner		
<b>Component:</b>	U.S. Coast Guard (USCG)	<b>Office:</b>	National Maritime Center (NMC)

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

<b>Collection Title:</b>	Certificate of Discharge to Merchant Mariner		
<b>OMB Control Number:</b>	1625-0012	<b>OMB Expiration Date:</b>	May 31, 2018
<b>Collection status:</b>	Revision	<b>Date of last PTA (if applicable):</b>	N/A

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

<b>Name:</b>	Michael P. Toth		
<b>Office:</b>	NMC 4-1	<b>Title:</b>	Branch Chief
<b>Phone:</b>	304-433-3729	<b>Email:</b>	Michael.P.Toth2@uscg.mil

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

<b>Name:</b>	Anthony Smith		
<b>Office:</b>	CG-612	<b>Title:</b>	PRA Manager
<b>Phone:</b>	202-473-3532	<b>Email:</b>	Anthony.D.Smith@uscg.mil



## SPECIFIC IC/Forms PTA QUESTIONS

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

The information is used on an as needed basis by mariners and the U.S. Coast Guard to establish sea service and qualifications for issuance of a Merchant Mariner Credential (MMC) or additional endorsements issued by the U.S. Coast Guard. This information is also used for claims against employers, medical claims, qualifying for retirement and/or insurance benefits, and provides the U.S. Maritime Administration (MARAD) on the availability of mariners in time of national emergency. If the information is not gathered, the U.S. Coast Guard would not be able to determine if the mariner meets the required sea time, in accordance with the Code of Federal Regulations (CFR), for the credential the individual is applying for.

The authority for this collection is Title 46 United States Code (U.S.C.) § 10311; Title 46 CFR Part 14.

### 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 checked="" type="checkbox"/> Other federal employees or contractors.
c. Who will complete and submit this	<input type="checkbox"/> The record subject of the form (e.g., the individual applicant).

<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>form? (<i>Check all that apply.</i>)</p>	<p><input type="checkbox"/> Legal Representative (preparer, attorney, etc.).</p> <p><input type="checkbox"/> Business entity.</p> <p style="padding-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="padding-left: 80px;"><input type="checkbox"/> Yes</p> <p style="padding-left: 80px;"><input type="checkbox"/> No</p> <p><input type="checkbox"/> Law enforcement.</p> <p><input type="checkbox"/> DHS employee or contractor.</p> <p><input checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i></p> <p>Title 46 CFR Part 14.301 requires each master or individual in charge of a vessel, when Shipping Articles are required, to prepare a Certificate of Discharge for each merchant mariner being discharged.</p>		
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input checked="" type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p> <p><a href="http://www.dco.uscg.mil/Portals/9/NMC/pdfs/forms/CG_718A.pdf">http://www.dco.uscg.mil/Portals/9/NMC/pdfs/forms/CG_718A.pdf</a></p>		
<p>e. What information will DHS collect on the form?</p>			
<p>Mariner's name, mariner's citizenship, mariner's reference number, mariner's credential number, master's name in signatory, and master's reference number.</p>			
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No <i>Check all that apply.</i></p>			
<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Social Security number  <input type="checkbox"/> Alien Number (A-Number)         </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)  <input type="checkbox"/> Social Media Handle/ID  <input type="checkbox"/> Known Traveler Number         </td> </tr> </table>		<input type="checkbox"/> Social Security number <input type="checkbox"/> Alien Number (A-Number)	<input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) <input type="checkbox"/> Social Media Handle/ID <input type="checkbox"/> Known Traveler Number
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<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"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics	
g. List the <b>specific authority</b> 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 <b>why</b> 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 ( <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. The Privacy Act statement is on the form. Further notice is provided to individuals via a System of Records, Federal Register Volume 74, Number 121 (Thursday, June 25, 2009), pages 30308-30311.  <input type="checkbox"/> No.	

### 3. How will DHS store the IC/form responses?



<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input checked="" type="checkbox"/> Paper. Please describe. In accordance with Title 46 CFR Part 14, Subpart C, one hard copy of the form CG-718A is given to the discharged mariner who may submit the information to the U.S. Coast Guard NMC as evidence of sea service to show eligibility for an original, renewed, or upgraded Merchant Mariner Credential. If the mariner submits his copy with his application then the hard copy is retained with the mariner's application file.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. The U.S. Coast Guard enters the data from the CG-718A into the Merchant Mariner Licensing and Documentation (MMLD) database system for use during the mariners' next credential application evaluation.</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. <a href="#">Click here to enter text.</a></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. The following data elements are entered into MMLD database: Citizenship, rating (capacity in which employed), place of shipment, date of shipment, place of discharge, date of discharge, vessel name, vessel official number, vessel class, operating company, and the nature of the voyage.</p> <p><input type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a></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.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p> <p>This form CG-718A already includes a Privacy Act Statement that will be updated. The U.S. Coast Guard enters the data elements from the CG-718A into MMLD database system, within which the mariner is assigned a Reference Number as a personal identifier for retrieval of the mariner’s record and for use during the mariner’s next credential application evaluation.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p><a href="#">Click here to enter text.</a></p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Paper records related to issuance of Merchant Mariner Credentials are held on site for one (1) year past the last activity with the file. After that time, records are then transferred to the Washington National Records Center in Suitland, MD. Electronic records are stored on a secure database server at the Coast Guard Operations Systems Center (OSC).</p> <p>The form CG-718A falls under our Records Disposition Authority, Item 1D, for Records for Merchant Mariners Licensed 1968-Present for whom the USCG does not issue a DD 214, Report of Separation from Military Service. This includes paper records, microfilm copies, and records in the MMLD system or equivalent. The disposition for these records is Temporary and to be destroyed 75 years after cutoff.</p> <p>Records Disposition Authority SF-115 NARA Job Number: N1-026-08-5</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.



<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>If the file is entered/scanned into the MMLD system, the paper file may be destroyed upon verification. Once the form CG-718A is entered into MMLD for records storage and the information is verified, the copy mailed to the NMC by the operating company is destroyed by industrial shredders.</p> <p>Upon issuance of a Destruction Notice by NARA after 75 years, the U.S. Coast Guard will grant permission for destruction of the paper records, which may include a copy of the form CG-718A submitted by the mariner.</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.</p> <p><input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	



**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:	March 13, 2018
Date submitted to DHS Privacy Office:	Click here to enter a date.
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. The PAS will be updated. <input type="checkbox"/> No. Please describe why not. <a href="#">Click here to enter text.</a>
<b>Component Privacy Office Recommendation:</b>	
<p>The Certificate of Discharge to Merchant Mariner information collection is used on an as needed basis by mariners and the U.S. Coast Guard to establish sea service and qualifications for issuance of a Merchant Mariner Credential (MMC) or additional endorsements issued by the U.S. Coast Guard. This information is also used for claims against employers, medical claims, qualifying for retirement and/or insurance benefits, and provides the U.S. Maritime Administration (MARAD) on the availability of mariners in time of national emergency.</p> <p>The form collects the following information: Mariner’s name, mariner’s citizenship, mariner’s reference number, mariner’s credential number, master’s name in signatory, and master’s reference number.</p> <p>DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System and DHS/USCG-030 Merchant Seamen’s Records 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:	Click here to enter text.
Date approved by DHS Privacy Office:	May 30, 2018
PTA Expiration Date	May 30, 2021

### 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> PRIV will work with USCG as needed to update the Privacy Act Statement.
PTA:	Choose an item.



	Click here to enter text.
PIA:	<p><b>System covered by existing PIA</b>          If covered by existing PIA, please list: DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System (MMLDS)          If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p><b>System covered by existing SORN</b>          If covered by existing SORN, please list: DHS/USCG-030 Merchant Seamen's Records          If a SORN update is required, please list: Click here to enter text.</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 CG-718A (Certificate of Discharge to Merchant Mariner), which is associated with OMB Control Number 1625-0012. The information collected from this form is used by mariners and USCG to establish sea service and qualifications for issuance of a Merchant Mariner Credential (MMC) or additional endorsements issued by USCG. The information is also used for claims against employers, medical claims, qualifying for retirement and/or insurance benefits, and provides the U.S. Maritime Administration (MARAD) on the availability of mariners in time of national emergency.</b></p> <p><b>USCG enters the data from form CG-718A into the Merchant Mariner Licensing and Documentation (MMLD) database system. No information on this form is shared outside of the collecting office.</b></p> <p><b>The DHS Privacy Office finds that this form is privacy-sensitive, requiring PIA and SORN coverage.</b></p> <p><b>PIA coverage is provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System, which specifically outlines the MMLD system and the information it collects.</b></p> <p><b>SORN coverage is provided by DHS/USCG-030 Merchant Seamen's Records, which allows for the collection of information in order to administer the Commercial Vessel Safety Program to determine domestic and international qualifications for the issuance of licenses, documents, and staff officer certifications. This includes establishing eligibility of a merchant mariner's document, duplicate documents, or additional endorsements issued by USCG.</b></p>	



# Homeland Security

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, [pia@hq.dhs.gov](mailto:pia@hq.dhs.gov)  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)

**The DHS Privacy Office will assist USCG in updating the Privacy Act Statement for this form as needed.**