



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:	CBP Form 3229		
Form Title:	Certificate of Origin		
Component:	Customs and Border Protection (CBP)	Office:	Trade Agreements Branch

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Certificate of Origin		
OMB Control Number:	OMB 1650-0016	OMB Expiration Date:	September 30, 2018
Collection status:	Revision	Date of last PTA (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Seth Mazze		
Office:	Trade Agreements Branch	Title:	Field Operations Program Specialist
Phone:	(202) 863-6567	Email:	Seth.mazze@cbp.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Seth Mazze		
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Office:	Trade Agreements Branch	Title:	Field Operations Program Specialist
Phone:	(202) 863-6567	Email:	Seth.mazze@cbp.dhs.gov

SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

- a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*
If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.

CBP Form 3229, Certificate of Origin, is used by shippers and importers to declare that goods being imported into the United States are produced or manufactured in a U.S. insular possession (which are American territories outside the customs territory of the United States and includes the U.S. Virgin Islands, Guam, American Samoa, Wake Island, Midway Islands, and Johnston Atoll) from materials grown, produced or manufactured in these territories. This form includes a list of the foreign materials in the goods, including their description and value. CBP Form 3229 is used as documentation for goods entitled to enter the U.S. free of duty.

CBP Form 3229 helps CBP determine whether or not imported merchandise is exempt from duty under the applicable statutory provisions. The information is automated through the Automated Commercial Environment (ACE).

- b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

This form is authorized by General Note 3(a)(iv) of the Harmonized Tariff Schedule of the United States (19 U.S.C. 1202) and is provided for by 19 CFR Part 7.3.

2. Describe the IC/Form



<p>a. Does this form collect any Personally Identifiable Information” (PII¹)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>b. From which type(s) of individuals does this form collect information? (Check all that apply.)</p>	<p><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.</p>
<p>c. Who will complete and submit this form? (Check all that apply.)</p>	<p><input type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input type="checkbox"/> Legal Representative (preparer, attorney, etc.). <input checked="" type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.</p>
<p>d. How do individuals complete the form? Check all that apply.</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)</p>

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.



	<i>Provide link:</i>
<p>e. What information will DHS collect on the form? <i>List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.</i></p>	
<p>Name of person completing certificate Name of Firm Shippers Export DEC No. Carrier Name (Vessel or Airline) Consignee information Location of Consignee (City and State) Address of Shipper Email of Shipper Signature of Shipper</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Check all that apply.</i></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 financial account number <input checked="" type="checkbox"/> Other. <i>Please list: Certificate #</i>	<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.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics
<p>g. List the specific authority to collect SSN or these other SPII elements.</p>	
<p>N/A</p>	
<p>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.</p>	
<p>CBP Form 3229 is used as documentation for goods entitled to enter the U.S. free of duty.</p>	



CBP Form 3229 helps CBP determine whether or not imported merchandise is exempt from duty under the applicable statutory provisions.. The shipper of the merchandise will sign the CBP Form 3229 upon submission.

<p>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>)?</p>	<p><input checked="" type="checkbox"/> Yes. Please describe how notice is provided. PA statement will be developed for this form.</p> <p><input type="checkbox"/> No.</p>
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3. How will DHS store the IC/form responses?	
<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Scanned by shipper and submitted via Automated Broker Interface upon request by CBP.</p>
<p>b. If electronic, how does DHS input the responses into the IT system?</p>	<p><input type="checkbox"/> Manually (data elements manually entered). Please describe. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Automatically. Please describe. Scanned by shipper.</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 type="checkbox"/> By a unique identifier.² <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>By entry number (The entry number is a CBP-assigned number that is unique to each Entry Summary (CBP Form 7501)).</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>CBP retains import records are maintained for a period of six years from the date of entry.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Per the ACE PIA, CBP retains information pertaining to import records for a period of six years from the date of entry. Personal information collected in connection with the creation of a carrier, broker, or importer account is retained for up to three years following the closing of the account either through withdrawal by the individual or denial of access by CBP.</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>	

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.



**Homeland
Security**

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
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:	Kimberly P. Morton
Date submitted to component Privacy Office:	Click here to enter a date.
Date submitted to DHS Privacy Office:	May 2, 2018
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: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
CBP Privacy finds this collection to be privacy sensitive, since CBP form 3229 contains PII (name and address). PIA coverage is required and provided for by DHS/CBP/PIA-003(b) Automated Commercial Environment (ACE), July 31, 2015, which provides notice of CBP's collection of importer information for compliance and inspection purposes. SORN coverage is provided for by DHS/CBP-001 Import Information Systems (IIS), August 25, 2016, which describes CBP's collection of information from Importers and shippers for the purpose of facilitating trade.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Max Binstock
PCTS Workflow Number:	1162684
Date approved by DHS Privacy Office:	May 3, 2018
PTA Expiration Date	May 3, 2021

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 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:	DHS PRIV has commented on this ICR/Form. Privacy Act Statement required
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	New e(3) statement is required. Privacy Act Statement submitted with PTA is approved.
PTA:	No system PTA required. Click here to enter text.



PIA:	<p>System covered by existing PIA If covered by existing PIA, please list: DHS/CBP/PIA-003 Automated Commercial Environment (ACE) If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>System covered by existing SORN If covered by existing SORN, please list: DHS/CBP-001 Import Information System, July 26, 2016, 81 FR 48826 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>CBP Privacy is submitting this Forms-PTA to discuss CBP Form 3229, <i>Certificate of Origin</i>, which is associated with OMB Number 1651-0016. CBP Form 3229 is used to by shippers and importers to declare that goods being imported into the United States are produced or manufactured in a U.S. insular possession from materials grown, produced or manufactured in these territories. This form includes a list of the foreign materials in the goods, including their description and value. CBP Form 3229 helps CBP determine whether or not imported merchandise is exempt from duty under the applicable statutory provisions.</p> <p>CBP Form 3229 is completed by the shipper of the merchandise, who will sign upon submission. In addition, consignee information is collected as well as business information.</p> <p>The DHS Privacy Office finds that this is a privacy-sensitive system form that requires PIA coverage. SORN coverage is required because information is retrieved by unique identifier.</p> <p>PIA coverage is provided by DHS/CBP/PIA-003 ACE which outlines the risks of collecting PII related to import information from the trade community. SORN coverage is provided by DHS/CBP-001 IIS, which describes CBP’s collection of information from Importers and shippers for the purpose of facilitating trade.</p> <p>The Privacy Act Statement submitted in coordination with this PTA is approved and should be added to CBP Form 3229.</p>	