



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:	TSA Form 418		
Form Title:	MD-3 PIN Application		
Component:	Transportation Security Administration (TSA)	Office:	SPIE

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Maryland Three Airports "MD-3": Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC, Metropolitan Area Flight Restricted Zone		
OMB Control Number:	1652-0029	OMB Expiration Date:	November 30, 2018
Collection status:	Revision	Date of last PTA (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Kathie Stapleton		
Office:	SPIE	Title:	MD-3 Program Manager
Phone:	571/227-3216	Email:	Kathie.stapleton@tsa.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Christina Walsh		
Office:	IT	Title:	PRA Officer
Phone:	571/227- 2062	Email:	Christina.walsh@tsa.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.*

The purpose of the collection is so that TSA can conduct Security Threat Assessments (STA) on individuals who operate an aircraft to or from, or serve as the security coordinator at, College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32). In order to perform the STA, TSA requires the completion of TSA Form No. 418, MD-3 Personal Identification Number (PIN) Application. TSA is revising this collection by providing an electronic option for the submission of the form.

- 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.*

49 USC § 114(f) – TSA is authorized to assess threats to transportation and conduct STA’s on transportation security personnel. [49 CFR Part 1562.1](#) - Maryland Three Airports: Enhanced Security Procedures for Operations at Certain Airports in the Washington, DC, Metropolitan Area Flight Restricted Zone. In addition, FAA regulation 14 CFR Part 93 details the enhanced security procedures required for aircraft operators utilizing the MD-3 airports.

2. Describe the IC/Form

- | | |
|---|--|
| a. Does this form collect any Personally Identifiable Information” (PII ¹)? | <input checked="" type="checkbox"/> Yes
<input type="checkbox"/> No |
|---|--|

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.



<p>b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> Members of the public</p> <p style="padding-left: 20px;"><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</p> <p style="padding-left: 20px;"><input type="checkbox"/> Non-U.S. Persons.</p> <p><input type="checkbox"/> DHS Employees</p> <p><input type="checkbox"/> DHS Contractors</p> <p><input type="checkbox"/> Other federal employees or contractors.</p>
<p>c. Who will complete and submit this form? <i>(Check all that apply.)</i></p>	<p><input checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant).</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 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? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. Paper forms may be faxed to TSA.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) Electronic forms may be emailed to mdthree@tsa.dhs.gov.</p> <p><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? <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>	



From aircraft operators and/or security coordinators: full name; social security number (last 4 only); address; telephone number; date of birth; valid FAA airman or student pilot certificate number and medical certificate; and fingerprints. Applicants must also submit a list of the aircraft make, model, and FAA registration number of each aircraft the applicant intends to operate to or from Maryland Three airports. Applicants must also present a valid government ID such as a driver's license or passport to the airport manager.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? *Check all that apply.*

- | | |
|---|--|
| <input checked="" type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) |
| <input type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number |
| <input type="checkbox"/> Visa Number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input type="checkbox"/> Passport Number | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Bank Account, Credit Card, or other financial account number | <input checked="" type="checkbox"/> Biometrics |
| <input type="checkbox"/> Other. <i>Please list:</i> | |

g. List the **specific authority** to collect SSN or these other SPII elements.

9 CFR Part 1562.1; EO 9397, as amended.

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.

To positively identify applicants and conduct an accurate STA on them including a fingerprint-based Criminal History Records Check (CHRC).

- | | |
|---|---|
| i. Are individuals provided notice at the time of collection by DHS (<i>Does the records subject have notice of the collection or is</i> | <input checked="" type="checkbox"/> Yes. Please describe how notice is provided.
Individuals must sign the form. |
| | <input type="checkbox"/> No. |



<i>form filled out by third party)?</i>	
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3. How will DHS store the IC/form responses?	
a. How will DHS store the original, completed IC/forms?	<input checked="" type="checkbox"/> Paper. Please describe. Filed alphabetically by airport in a secure file cabinet. <input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Filed alphabetically by airport on a stand-alone computer. <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Click here to enter text. <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<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. Click here to enter text. <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> By airport.
d. What is the records retention schedule(s)? <i>Include</i>	Cut off at end of calendar year. Transfer to Federal Records Center after 3 years, NARA after 10 years (N1-560-04-10, Item 3)

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.



<i>the records schedule number.</i>	
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	Records are reviewed annually.
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>	
<input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Fingerprints are shared with IDENT.	
<input checked="" 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. Fingerprints are shared with the FBI for the CHRC's. The information may be shared with FAA relevant to the issuance of a security clearance, license or other credential. The information may be shared with the Terrorist Screening Center (TSC) to resolve potential watch list matches. TSA also may share the information it receives with Federal, State or local law enforcement or intelligence agencies or other organizations, in accordance with the routine uses identified in the applicable Privacy Act SORN, DHS/TSA 002, Transportation Security Threat Assessment System (TSTAS).	
<input type="checkbox"/> 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:	Jennifer L. Schmidt
Date submitted to component Privacy Office:	September 14, 2018
Date submitted to DHS Privacy Office:	September 14, 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. See below. <input type="checkbox"/> No. Please describe why not. Click here to enter text.
<p>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></p> <p>TSA Privacy recommends approval of this PTA. TSA Form 418 is privacy sensitive as it collects personal information from members of the public. PIA coverage is provided by DHS/TSA/PIA-022, MD-3 Airports. SORN coverage is not necessary because the forms are not retrieved by a personal identifier; however, DHS/TSA/SORN-002 Transportation Security Threat Assessment System is applicable.</p> <p>The current Privacy Act Statement on the form reads: AUTHORITY: 49 USC 114 authorizes collection of this information. PRINCIPAL PURPOSE(S): TSA will use this information to process your application to fly to, from, or through the airspace of the College Park, Hyde Field, and Potomac airports located in Maryland. ROUTINE USES: TSA may share this information with FAA when relevant to the issuance of security clearance, license or other credential. For further information, please consult DHS/TSA 002 Transportation Security Threat Assessment System. DISCLOSURE: Voluntary; Failure to provide the requested information may result in the denial of your request to take off, land, or fly through the airspace of the Maryland 3 airports.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Sean McGuinness
PCTS Workflow Number:	1169443
Date approved by DHS Privacy Office:	September 28, 2018
PTA Expiration Date	September 28, 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 not received this ICR/Form.
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. The current Privacy Act Statement on the form is sufficient.
PTA:	Choose an item. System PTA approved and on file with PRIV



PIA:	<p>Choose an item. If covered by existing PIA, please list: DHS/TSA/PIA-022 MD-3 Airports If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>Choose an item. If covered by existing SORN, please list: DHS/TSA-002 Security Threat Assessment System 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>DHS Privacy Office finds that the MD-3 PIN Application (TSA Form 418) is privacy sensitive as it collects PII from members of the public (to include U.S. citizens or lawful permanent residents).</p> <p>The purpose of the collection is so that TSA can conduct Security Threat Assessments (STA) on individuals who operate an aircraft to or from, or serve as the security coordinator at, College Park Airport (CGS), Potomac Airfield (VKX), and Washington Executive/Hyde Field (W32). TSA confirms that applicants must also present a valid government ID such as a driver’s license or passport to the airport manager, however, the driver’s license and passport number will not be collected.</p> <p>PRIV agrees with TSA Privacy that PIA coverage is provided under DHS/TSA/PIA-022 MD-3 Airports. DHS/TSA/PIA-022 outlines how TSA conducts name-based Security Threat Assessments (STA) and fingerprint-based Criminal History Records Checks (CHRCs) on pilots who operate aircraft and apply for privileges to fly to or from the three General Aviation airports in the Washington, D.C. restricted flight zones (Potomac Airfield, Washington Executive/Hyde Field, and College Park Airport), otherwise known as the Maryland Three (MD-3) program, and for the Airport Security Coordinator (ASC)1 at a MD-3 airport.</p> <p>PRIV finds that SORN coverage is provided under DHS/TSA-002 Security Threat Assessment System. This SORN outlines how TSA collects and maintains records related to security threat assessments, employment investigations, and evaluations that the TSA conducts on certain individuals for security purposes.</p> <p>Privacy Act Statement approved concurrently with this PTA.</p>	