



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:	N/A		
Form Title:	N/A		
Component:	U.S. Coast Guard (USCG)	Office:	CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1995, 1997 and 2010 Amendments to the International Convention		
OMB Control Number:	1625-0079	OMB Expiration Date:	January 31, 2020
Collection status:	Extension	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Mr. David Du Pont		
Office:	CG-REG	Title:	Reg Dev Mgr
Phone:	202-372-1497	Email:	David.A.DuPont@uscg.mil

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Mr. Anthony Smith		
Office:	CG-612	Title:	PRA Coordinator
Phone:	202-475-3532	Email:	Anthony.D.Smith@uscg.mil



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

The purpose of this information collection is to ensure compliance with the international requirements of the Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Convention, and to maintain an acceptable level of quality in activities associated with training and assessment of merchant mariners.

There is no form associated with this collection. The information collected includes the mariner’s name, officer/rating endorsement and Merchant Mariner Credential (MMC) number, and the instructor/designated examiner’s name, job title, officer/rating endorsement, MMC number and signature.

The authority for this collection is 46 U.S.C. Chapters 71 and 73.

Records are maintained in accordance with NARA’s retention schedule: NC1-26-76-2 Item # 406.

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
b. From which type(s) of individuals does this form collect information? (Check all that apply.)	<input checked="" type="checkbox"/> Members of the public <ul style="list-style-type: none"> <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.

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>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 checked="" 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 checked="" 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></p> <p>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.</p> <p><input checked="" type="checkbox"/> Electronic. (ex: fillable PDF)</p> <p><input type="checkbox"/> Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p>
<p>e. What information will DHS collect on the form?</p> <p>The information collected includes the mariner's name, officer/rating endorsement and MMC number, and the instructor/designated examiner's name, job title, officer/rating endorsement, MMC number and signature.</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>Yes.</i></p>	
<p><input type="checkbox"/> Social Security number</p> <p><input type="checkbox"/> Alien Number (A-Number)</p> <p><input type="checkbox"/> Tax Identification Number</p> <p><input type="checkbox"/> Visa Number</p> <p><input type="checkbox"/> Passport Number</p>	<p><input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI)</p> <p><input type="checkbox"/> Social Media Handle/ID</p> <p><input type="checkbox"/> Known Traveler Number</p> <p><input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.)</p>



<input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input checked="" type="checkbox"/> Other. <i>Please list:</i> Merchant Mariner Credential (MMC) number <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics	
g. List the specific authority to collect SSN or these other SPII elements. 46 U.S.C. Chapters 71 and 73.	
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. The MMC number ensures that mariner training and assessment information is properly linked to his/her Merchant Seamen's Record.	
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 information is provided in association with an "Application for Merchant Mariner Credential" (form CG-719B). CG-719B has a Privacy Notice located at the bottom of the form. <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. The CG credentialing specialist enters information into the Merchant Mariner Licensing and Documentation System (MMLD) database. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository).



<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 CG credentialing specialist enters information into the MMLD database.</p> <p><input type="checkbox"/> Automatically. Please describe.</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 <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. A CG credentialing specialist would retrieve information using the mariner name or MMC number.</p> <p><input type="checkbox"/> 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 retention schedule number: NC1-26-76-2 Item # 406.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Records are disposed/deleted in accordance with the Agency business rules and the retention schedule.</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>	

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.



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:	A.L. Craig
Date submitted to component Privacy Office:	January 16, 2020
Date submitted to DHS Privacy Office:	January 23, 2020
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 type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. There is no form associated with this collection.
Component Privacy Office Recommendation:	
<p>The purpose of this information collection is to ensure compliance with the international requirements of the Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Convention, and to maintain an acceptable level of quality in activities associated with training and assessment of merchant mariners.</p> <p>There is no form associated with this collection.</p> <p>The information collected includes the mariner’s name, officer/rating endorsement and Merchant Mariner Credential (MMC) number, and the instructor/designated examiner’s name, job title, officer/rating endorsement, MMC number, and signature.</p> <p>This collection is covered by DHS/USCG/PIA-015, Merchant Mariner Licensing Documentation System and DHS/USCG-030 Merchant Seaman’s Record and DHS/All-004, General Information Technology Access Account Record System SORNs</p>	



**Homeland
Security**

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www.dhs.gov/privacy



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Riley Dean
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	January 23, 2020
PTA Expiration Date	January 23, 2023

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:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/USCG/PIA-015 Merchant Mariner Licensing Documentation System</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
<p>SORN:</p>	<p>System covered by existing SORN</p> <p>If covered by existing SORN, please list: DHS/USCG-030 Merchant Seamen's Records, June 25, 2009, 74 FR 30308</p> <p>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>USCG is submitting this PTA to discuss the information collection, which is associated with OMB Control number 1525-0079. The purpose of this information collection is to ensure compliance with the international requirements of the Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Convention, and to maintain an acceptable level of quality in activities associated with training and assessment of merchant mariners.</p> <p>There is no form associated with this collection. The information collected includes the mariner's name, officer/rating endorsement and Merchant Mariner Credential (MMC) number, and the instructor/designated examiner's name, job title, officer/rating endorsement, MMC number, and signature. The information provided is stored in the Merchant Mariner Licensing and Documentation System (MMLD).</p> <p>The DHS Privacy Office agrees this is a privacy-sensitive information collection, requiring PIA and SORN coverage.</p> <p>PKA coverage is provided by DHS/USCG/PIA-015 Merchant Mariner Licensing Documentation System, which allows for the collection of information to (1) manage the issuance of credentials to Merchant Mariners and process merchant mariner applications; (2) produce merchant mariner credentials; (3) track merchant mariner credentials issued by the Coast Guard; (4) track the status of merchant mariners with respect to service, training, credentials, and qualifications, related to the operation of commercial vessels; (5) qualify merchant mariners for benefits and services administered by other agencies; and (6) perform merchant mariner call-ups related to national security.</p> <p>SORN coverage is provided by DHS/USCG-030 Merchant Seaman's Record, which allows for the collection of information to administer the Commercial Vessel Safety</p>	



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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 the Coast Guard and establishing and maintaining continuous records of the persons documentation transactions.