



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:	CG-4423		
Form Title:	Application for Marine Event		
Component:	U.S. Coast Guard (USCG)	Office:	CG-WWM-1

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Click here to enter text.		
OMB Control Number:	Regattas and Marine Parades	OMB Expiration Date:	October 31, 2020
Collection status:	Extension	Date of last PTA (if applicable):	November 4, 2016

PROJECT OR PROGRAM MANAGER

Name:	LT Urdley N. Smith Jr.		
Office:	CG-WWM-1	Title:	Staff Officer
Phone:	718-787-5135	Email:	Urdley.n.smith@uscg.mil

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Albert Craig		
Office:	CG-6P	Title:	PRA Coordinator
Phone:	202-475-3528	Email:	Albert.l.craig@uscg.mil



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

RENEWAL

Application for Marine Event (CG-4423) provides the Coast Guard with the minimum information needed to identify the marine event and the event contact to consider whether or not an event is likely to result in the loss of human life unless special precautions are taken.

Marine events may actually block navigation channels or cause interference with adjacent vessel traffic or with the ability of larger commercial vessels to safely navigate designated shipping lanes. Also, adjacent vessel traffic may interfere with the safety or conduct of the marine event.

CG Form 4423 contains basic business contact information which may include the name, address, phone number, city and state of any event sponsor wishing to conduct activity that may block, or impede safe navigation on the navigable waters of the United States.

14 U.S.C. § 505; 33 U.S.C. § 1233; 46 U.S.C. §§ 3717, 12501; 33 CFR 100 are the USCG authorities for this collection.

Records are maintained in accordance with NARA record retention schedule: N1-026-05-015.

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 <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input 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? <i>(Check all that apply.)</i></p>	<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 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? <i>Check all that apply.</i></p>	<p><input checked="" type="checkbox"/> Paper. <input checked="" type="checkbox"/> Electronic. (ex: fillable PDF) <input checked="" type="checkbox"/> Online web form. (available and submitted via the internet) Provide link: https://homeport.uscg.mil/Pages/MarineEventFormSubmission.aspx#</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>	
<p>Name, address, phone number, and city and state any event sponsor wishing to conduct activity that may block, or impede safe navigation on the navigable waters of the United States.</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> N/A.	
<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 type="checkbox"/> Other. <i>Please list:</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
g. List the specific authority 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 why 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</i>	<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. The Privacy Act Statement is placed on the bottom of Form CG-4423. <input type="checkbox"/> No.



<p><i>collection or is form filled out by third party)?</i></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 checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Marine Information for Safety and Law Enforcement (MISLE)</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Scanned forms are entered into the USCG Marine Information for Safety and Law Enforcement (MISLE) database.</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. Authorized USCG personnel manually enters scanned documents into the MISLE database.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</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. Information is retrieved by the MISLE Activity Number. Click here to enter text.</p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></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.



<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>N1-026-05-015.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>As records are maintained in the MISLE database, disposal/deletion is in accordance with the business rules for the database.</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 checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. The information is not explicitly shared, but is accessible to MISLE users if they choose to search for specific information regarding Marine Event Permits. The form is typically scanned and uploaded to the corresponding MISLE activity report.</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 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:	A.L. Craig
Date submitted to component Privacy Office:	June 22, 2020
Date submitted to DHS Privacy Office:	October 26, 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 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: Renewal	
<p>The USCG is renewing the Application for Marine Event (CG-4423) PTA.</p> <p>Application for Marine Event (CG-4423) provides the Coast Guard with the minimum information needed to identify the marine event and the event contact to consider whether or not an event is likely to result in the loss of human life unless special precautions are taken.</p> <p>Marine events may actually block navigation channels or cause interference with adjacent vessel traffic or with the ability of larger commercial vessels to safely navigate designated shipping lanes. Also, adjacent vessel traffic may interfere with the safety or conduct of the marine event.</p> <p>CG Form 4423 contains basic business contact information which may include the name, address, phone number, city and state of any event sponsor wishing to conduct activity that may block, or impede safe navigation on the navigable waters of the United States.</p> <p>14 U.S.C. § 505; 33 U.S.C. § 1233; 46 U.S.C. §§ 3717, 12501; 33 CFR 100 are the USCG authorities for this collection.</p>	



Records are maintained in accordance with NARA record retention schedule: N1-026-05-015.

CG-4423 is a privacy sensitive CG-Form with records maintained in the Marine Information for Safety and Law Enforcement system. This collection is covered by DHS/USCG/PIA-008 and DHS/USCG-013.



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Kattina Do
DHS Privacy Office Approver (if applicable):	Max Binstock
PCTS Workflow Number:	0014787
Date approved by DHS Privacy Office:	October 27, 2020
PTA Expiration Date	October 27, 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 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 approved this ICR/Form.
Date IC/Form Approved by PRIV:	October 27, 2020
IC/Form PCTS Number:	CG-4423
Privacy Act Statement:	New e(3) statement is required. Click here to enter text.
PTA:	Choose an item. Click here to enter text.



PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PIA, please list:</p> <ul style="list-style-type: none"> DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) <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:</p> <ul style="list-style-type: none"> DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE), June 25, 2009 74 FR 30305 <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 renewal PTA to discuss Application for Marine Event, Form CG-4423. This provides the Coast Guard with the minimum information needed to identify the marine event and the event contact to consider whether or not an event is likely to result in the loss of human life unless special precautions are taken. CG-4423 contains basic business contact information which may include the name, address, phone number, city and state of any event sponsor wishing to conduct activity that may block, or impede safe navigation on the navigable waters of the United States.</p> <p>The DHS Privacy Office (PRIV) agrees that this form is privacy-sensitive, requiring PIA coverage because PII is collected from members of the public and U.S. citizens or lawful permanent residents.</p> <p>PRIV agrees with USCG Privacy that PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE), which assess the collection of information, including PII, associated with vessels as well as investigatory information.</p> <p>PRIV agrees with USCG Privacy that SORN coverage is required because information is being retrieved by a unique identifier. PRIV also agrees with USCG Privacy that SORN coverage is provided by DHS/USCG-013, which outlines the Coast Guard’s collection and maintenance of records related to safety, security and law enforcement performance history of vessels, facilities, people and organizations engaged in marine transportation, including enforcement action, that can be used to</p>	



identify and address safety, security and environmental risks and to establish vessel eligibility for documentation as a U.S. flag vessel.

PRIV requires USCG update the SORN as under OMB Memorandum M-17-12, the SAOP shall ensure that all agency Privacy Act SORNs include routine uses for the disclosure of information necessary to respond to a breach either of the agency's PII or, as appropriate, to assist another agency in its response to a breach.

USCG has also submitted a sufficient Privacy Act Statement with this PTA. However, the Privacy Act Statement needs to be updated in the form (CG-4423).