



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

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

<b>Collection Title:</b>	Credentialing and Manning Requirements for Officers of Towing Vessels		
<b>OMB Control Number:</b>	1625-0078	<b>OMB Expiration Date:</b>	July 31, 2017
<b>Collection status:</b>	Extension	<b>Date of last PTA (if applicable):</b>	N/A

#### PROJECT OR PROGRAM MANAGER

<b>Name:</b>	Mr. David Du Pont		
<b>Office:</b>	CG-REG	<b>Title:</b>	Reg Dev Mgr
<b>Phone:</b>	202-372-1497	<b>Email:</b>	<a href="mailto:David.A.DuPont@uscg.mil">David.A.DuPont@uscg.mil</a>

#### COMPONENT INFORMATION COLLECTION/FORMS CONTACT

<b>Name:</b>	Mr. Anthony Smith		
<b>Office:</b>	CG-612	<b>Title:</b>	PRA Coordinator
<b>Phone:</b>	202-475-3532	<b>Email:</b>	<a href="mailto:Anthony.D.Smith@uscg.mil">Anthony.D.Smith@uscg.mil</a>



## SPECIFIC IC/Forms PTA QUESTIONS

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

The purpose of the information collection is to ensure that a mariner’s training information is available to assist the Coast Guard in determining the mariner’s overall qualifications to hold certain credentials. A mariner submits his/her training information at the time that they apply for a merchant mariner credential. While the materials may be submitted in paper format or electronically, the Coast Guard prints all e-files and creates a paper file for evaluation at the National Maritime Center.

The Coast Guard requires that certain mariners maintain documentation of ongoing participation in training and drills if they are seeking an endorsement as master or mate of towing vessels or for renewal of the credential. Recording this information is necessary so those mariners are able to demonstrate proficiency in: vessel management, seamanship, navigation, watchkeeping, radar operation, fire prevention/fighting, emergency procedures, lifesaving training, and environmental regulations. This information helps ensure that a mariner's training information is available to assist in determining an individual’s overall qualification to hold a Coast Guard issued merchant mariner’s towing vessel endorsement.

There is no form associated with this collection. The information contains the mariner’s name and reference number, along with the designated examiner’s name and identification number.

The authority for this collection is 46 U.S. Code 2013 and chapter 71 and 75.

### 2. Describe the IC/Form

<b>a.</b> Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>b.</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 type="checkbox"/> Non-U.S. Persons. <input type="checkbox"/> DHS Employees

<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.



	<input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
<p><b>c.</b> Who will complete and submit this form? (<i>Check all that apply.</i>)</p>	<input 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 checked="" type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> There is no form associated with this collection.
<p><b>d.</b> How do individuals complete the form? <i>Check all that apply.</i></p>	<input type="checkbox"/> Paper. <input type="checkbox"/> Electronic. (ex: fillable PDF) <input type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i>
<p><b>e.</b> What information will DHS collect on the form? None, there is no form associated with this collection.</p>	
<p><b>f.</b> Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No.</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 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"/> Other. <i>Please list:</i>		<input type="checkbox"/> Biometrics
<b>g.</b> List the <i>specific authority</i> to collect SSN or these other SPII elements. N/A.		
<b>h.</b> How will this information be used? What is the purpose of the collection? Describe <i>why</i> this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program. N/A.		
<b>i.</b> 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 type="checkbox"/> Yes. Please describe how notice is provided. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> No.	

3. How will DHS store the IC/form responses?	
<b>a.</b> How will DHS store the original, completed IC/forms?	<input checked="" type="checkbox"/> Paper. Please describe. Training information is maintained as part of a mariner's application. <input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. <a href="#">Click here to enter text.</a> <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository).
<b>b.</b> If electronic, how does DHS input the responses into the IT system?	<input type="checkbox"/> Manually (data elements manually entered). Please describe. <input type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a>



<p><b>c.</b> 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.<sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA.  <a href="#">Click here to enter text.</a></p> <p><input type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p><input checked="" type="checkbox"/> No information is retrieved.</p>
<p><b>d.</b> What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>A record is retained for 1-year after the final action on the mariner’s application. After that time, the records are sent to the Federal Records Center.</p>
<p><b>e.</b> How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>See above.</p>
<p><b>f.</b> Is any of this information shared outside of the original program/office?  <input checked="" type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</p>	
<p><input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe.  <a href="#">Click here to enter text.</a></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>	



<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.



**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)

<b>Component Privacy Office Reviewer:</b>	Robert Herrick
<b>Date submitted to component Privacy Office:</b>	March 28, 2017
<b>Date submitted to DHS Privacy Office:</b>	April 7, 2017
<b>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>)</b>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. There are no forms associated with this collection.
<b>Component Privacy Office Recommendation:</b>	
Credentialing and Manning Requirements for Officers of Towing Vessels (1625-0078) is not a privacy sensitive collection.	





## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Michael Capparra</b>
<b>PCTS Workflow Number:</b>	1141518
<b>Date approved by DHS Privacy Office:</b>	4/25/17
<b>PTA Expiration Date</b>	4/25/20

### DESIGNATION

<b>Privacy Sensitive IC or Form:</b>	Yes If "no" PTA adjudication is complete.
<b>Determination:</b>	<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.
<b>DHS IC/Forms Review:</b>	Choose an item.
<b>Date IC/Form Approved by PRIV:</b>	Click here to enter a date.
<b>IC/Form PCTS Number:</b>	Click here to enter text.
<b>Privacy Act Statement:</b>	Choose an item. Click here to enter text.
<b>PTA:</b>	<b>No system PTA required.</b> Click here to enter text.



<b>PIA:</b>	<p><b>System covered by existing PIA</b> If covered by existing PIA, please list: <b>DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System</b> If a PIA update is required, please list: <a href="#">Click here to enter text.</a></p>
<b>SORN:</b>	<p><b>System covered by existing SORN</b> If covered by existing SORN, please list: <b>DHS/USCG-030 - Merchant Seamen's Records June 25, 2009 74 FR 30308</b> If a SORN update is required, please list: <a href="#">Click here to enter text.</a></p>
<p><b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>The DHS Privacy Office finds that the Credentialing and Manning Requirements for Officers of Towing Vessels (CG 1625-0078) is a privacy-sensitive information collection, requiring both PIA and SORN coverage. The Coast Guard collects a mariner’s name, unique identifying number, documentation of training, and the name and ID number of the designated examiner associated with the training. PRIV understands that information is retrieved from the collection using a unique identification number assigned by the Coast Guard, and is used to determine whether a merchant mariner is proficient in the skills (vessel management, seamanship, navigation, watchkeeping, radar operation, fire prevention/fighting, emergency procedures, lifesaving training, and environmental regulations, necessary to attain an endorsement as master or mate of a towing vessel.</p> <p>PRIV finds that PIA coverage is provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System, which assesses the privacy implications of the Coast Guard’s use of PII in (1) managing the issuance of credentials to Merchant Mariners and processing merchant mariner applications; (2) producing merchant mariner credentials; (3) tracking merchant mariner credentials issued by the Coast Guard; (4) tracking the status of merchant mariners with respect to service, training, credentials, and qualifications, related to the operation of commercial vessels; (5) qualifying merchant mariners for benefits and services administered by other agencies; and (6) performing merchant mariner call-ups related to national security. PRIV finds that SORN coverage is provided under DHS/USCG-030 - Merchant Seamen's Records, which outlines the Coast Guard’s collection and maintenance of records in order to administer the Commercial Vessel Safety Program to determine domestic and international qualifications for the issuance of licenses, documents, and staff officer</p>	



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.