



## 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.

Form Number:	CG-16700		
Form Title:	North American Ice Service (NAIS) Customer Survey		
Component:	U.S. Coast Guard (USCG)	Office:	International Ice Patrol

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

Collection Title:	North American Ice Service (NAIS) Customer Survey		
OMB Control Number:	1625-0087	OMB Expiration Date:	February 28, 2021
Collection status:	Extension	Date of last PTA (if applicable):	November 16, 2017

#### **PROJECT OR PROGRAM MANAGER**

Name:	LT Donald Rudnickas		
Office:	International Ice Patrol	Title:	Ice Information Branch Chief
Phone:	860-271-2633	Email:	Donald.W.Rudnickas@uscg.mil

#### **COMPONENT INFORMATION COLLECTION/FORMS CONTACT**

Name:	Anthony Smith
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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

As outlined in Safety of Life at Sea (SOLAS) Chapter V regulation 6 and 46 USC 80301-2 the U.S. Coast Guard is directed to maintain an ice patrol in the North Atlantic Ocean to study and observe ice and current conditions. Ice dangers in the region shall be broadcast by available means to trans-Atlantic and other passing vessels.

The Coast Guard International Ice Patrol, as directed by the Commandant of the Coast Guard monitors the extent of the iceberg danger near the Grand Banks of Newfoundland and provides iceberg warnings to the maritime community by broadcasting the southeastern, southern, and southwestern limits of all known ice in two message bulletins and one radio-facsimile chart each day.

Executive Order 12862 directs the United States Coast Guard (USCG) to conduct surveys (both qualitative and quantitative) to determine the kind and quality of services our customers want and expect, as well as their satisfaction with USCG's existing services. This survey will be limited to data collections that solicit strictly voluntary opinions and will not collect information that is required or regulated.

46 U.S.C. § 80302 is the authority for this collection.

### 2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII <sup>1</sup> )?	<input type="checkbox"/> Yes <input checked="" 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 <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" 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>c. Who will complete and submit this form? (<i>Check all that apply.</i>)</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 checked="" type="checkbox"/> Business entity. <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  <input type="checkbox"/> No</p> <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization <b>that is NOT the record subject.</b> <i>Please describe.</i> <a href="#">Click here to enter text.</a>
<p>d. How do individuals complete the form? <i>Check all that apply.</i></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) <i>Provide link:</i>
<p>e. What information will DHS collect on the form?</p>	
<p>Vessel name, call sign, home port, NAIS related information (e.g. bulletins, products, navigation, etc.)</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>No.</i></p>	
<input type="checkbox"/> Social Security number <input type="checkbox"/> Alien Number (A-Number)	<input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) <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 type="checkbox"/> Biometrics
<input type="checkbox"/> Other. <i>Please list:</i>	

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 collection or is form filled out by third party</i> )?	<input checked="" type="checkbox"/> Yes, records subject fills out and submit the form. <input type="checkbox"/> No.
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### 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 type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text. <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.
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	<p>A CG documentation specialist scans CG-16700 into a secure file server on the USCG network.</p> <p>.</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.  <a href="#">Click here to enter text.</a></p> <p><input type="checkbox"/> Automatically. Please describe.  N/A</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.<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 checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>All Surveys are kept in a secure electronic file server on the USCG network. Information is retrieved by opening each survey individually.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records are kept permanently according to the Information and Life Cycle Management Manual (COMDTINST M5212.12A).</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Data Collection Ice Operations records are kept permanently. They are transferred to NARA five years after the conclusion of the project or the publication of the final record. (Ch. 1 to CONDTINST M5212.12A).</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>	

<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.



Yes, information is shared with other DHS components or offices. Please describe.  
Click here to enter text.

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

The survey is forwarded to the Canadian Ice Service (CIS).

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.**







# Homeland Security

Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
202-343-1717, pia@hq.dhs.gov  
[www.dhs.gov/privacy](http://www.dhs.gov/privacy)

information (e.g. bulletin, products, navigation, etc.). This collection is covered by DHS/ALL/PIA-069 DHS Surveys, Interviews, and Focus Groups.



## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	<b>Brian Pochatila</b>
DHS Privacy Officer Approver (if applicable):	<b>Riley Dean</b>
Workflow Number:	<b>00010725</b>
Date approved by DHS Privacy Office:	February 27, 2020
PTA Expiration Date	February 27, 2023

### DESIGNATION

Privacy Sensitive IC or Form:	<b>No If "no" PTA adjudication is complete.</b>
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 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:	<b>New e(3) statement is required.</b> Privacy Notice is concurrently submitted and approved with this PTA.
PTA:	Choose an item. Click here to enter text.



PIA:	<b>System covered by existing PIA</b> If covered by existing PIA, please list: DHS/ALL/PIA-069 DHS Surveys, Interviews, and Focus Groups. If a PIA update is required, please list: <a href="#">Click here to enter text.</a>
SORN:	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a> If a SORN update is required, please list: <a href="#">Click here to enter text.</a>
DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCG is submitting this PTA renewal for the North American Service (NAIS) Customer Survey. USCG maintains an ice patrol in the North Atlantic Ocean to study and observe ice and current conditions. Ice dangers in the region are then broadcast by available means to trans-Atlantic and other passing vessels. USCG conducts this survey to determine the kind and quality of services trans-Atlantic and other passing vessels want and expect, as well as their satisfaction with USCG’s existing services. This survey is limited to data collections that solicit strictly voluntary opinions and will not collect information that is required or regulated. This form collects vessel name, call sign, home port, and NAIS related information (e.g. bulletin, products, navigation, etc.). No PII is collected by the survey. The information collected is voluntary, anonymous, and aggregated. Responses will not be linked back to individuals. Individuals should not offer any unsolicited PII because it is not needed. The NAIS Customer Survey will be shared with the Canadian Ice Service.</p> <p>DHS Privacy agrees with USCG that the NAIS Customer Survey is a non-privacy sensitive as no PII is collected from this survey. However, DHS/ALL/PIA-069 DHS Surveys, Interviews, and Focus Groups discusses DHS and its Components periodically solicit voluntary feedback from its employees, contractors, external stakeholders, and the general public using surveys, interviews, and focus groups to improve DHS services and operations.</p> <p>The Privacy Notice is concurrently submitted and approved with this PTA.</p>	