



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: CG11410A

Form Title: Marine Transportation System Recovery Facility Status

Component: U.S. Coast Guard (USCG) **Office:** Atlantic Area (L-544)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title: Marine Transportation System Recovery Essential Elements of Information

OMB Control Number:	1625-NEW	OMB Expiration Date:	MM/DD/YYYY
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Collection status:	New collection	Date of last PTA (if applicable):	N/A
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PROJECT OR PROGRAM MANAGER

Name: Timothy Mann

Office:	Atlantic Area (L-544)	Title:	Port Security Specialist
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Anthony Smith		
Office:	CG-612	Title:	PRA Manager
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SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form	
<p>a. Describe the purpose of the information collection or form. <i>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).</i></p> <p><i>If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.</i></p> <p>Following a port disruption (natural causes or man-made) the USCG will gather post-disruption information from waterfront businesses in the affected area. The CG uses this data to measure the disrupted condition of the port against the normal baseline to provide critical input to those federal, state, and local response organizations that are engaging in restoring the port to its pre-disruption condition. This information also enables the USCG to assist in prioritizing recovery efforts and to gauge the effectiveness of the response.</p>	
<p>b. List the DHS (or component) authorities to collect, store, and use this information. <i>If this information will be stored and used by a specific DHS component, list the component-specific authorities.</i></p> <p>USCG Authorities: 33 U.S.C. §1225, 46 U.S.C. §70103, and 50 U.S.C. §191.</p>	

2. Describe the IC/Form	
<p>a. Does this form collect any Personally Identifiable Information" (PII¹)?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>b. From which type(s) of individuals does this form collect</p>	<p><input checked="" type="checkbox"/> Members of the public</p> <p><input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents</p> <p><input type="checkbox"/> Non-U.S. Persons.</p>

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.



information? (<i>Check all that apply.</i>)	<input type="checkbox"/> DHS Employees <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 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 that is NOT the record subject. <i>Please describe.</i> Click here to enter text.
<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 checked="" type="checkbox"/> Online web form. (available and submitted via the internet) <i>Provide link:</i> https://cg.portal.uscg.mil/units/lantarea/lant-5/LANT54/LANT544/LANT544%20Documents/MTS%20Recovery/CG11410A.pdf
<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>Facility status related information and business point of contact information: name (i.e. work telephone, and work email information). This information is requested on a voluntary basis. There is no regulatory requirement compelling the business to provide the information.</p>	
<p>f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? <i>N/A.</i></p>	
<input 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"/> 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"/> 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 <i>specific authority</i> 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 <i>why</i> 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. Please describe how notice is provided. The form is marked with a Privacy Act Statement on the bottom. IT is clearly visible to the business POC who is voluntarily providing the information. <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. Only the facility information is stored in a CG data base (CART, Common Assessment Reporting Tool) accessible to USCG personnel and other Federal agency



	<p>personnel with a need to know following a port disruption. The business POC information is not stored in the data bank. The POC information is only used upon receipt of the post disruption data to allow the CG to ask follow-up questions (if necessary) prior to entry of the facility info into the data base. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</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. A port recovery planner inputs the facility data manually and saves it as the Ports Baseline data.</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 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.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>Information is retrieved by the facility/ business name.</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>NARA retention schedule number N1-026-05-015.</p>
<p>e. How do you ensure that records are disposed of or deleted</p>	<p>As records are maintained in the CART database, disposal/deletion is in accordance with the business rules for the database.</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.



in accordance with the retention schedule?	
<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.</p> <p>Only facility status information is shared-no PII information from the business POC is retained in the data base.</p> <p><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.</p> <p>Only facility status information is shared-no PII information from the business POC is retained in the data base. Information is only shared with Federal, State, and local agencies with a need to know following a port disruption.</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:	Kenlinishia Tyler
Date submitted to component Privacy Office:	October 4, 2016
Date submitted to DHS Privacy Office:	October 26, 2016
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. This form has been in previous existence. The PAS can be found at the bottom of the form.
Component Privacy Office Recommendation:	
<p>CG-Form 11410A (i.e. Marine Transportation System Recovery Facility Status) is used to determine the status of a waterfront business/facility following a man-made or natural disaster. USCG uses this information to prioritize recovery efforts, gauge response effectiveness and measure the disrupted condition of a port against the normal baseline in order to provide critical input to those entities (e.g. federal, state, or local response organizations) responsible for restoring the port to its previous condition.</p> <p>Authorized USCG officials input waterfront business/facility data into the Common Assessment Reporting Tool (CART) which is only accessible to USCG personnel and federal agency personnel with a need to know.</p> <p>This collection is covered by DHS/USCG/PIA-022 and DHS/USCG-013.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Michael Capparra
PCTS Workflow Number:	1134045
Date approved by DHS Privacy Office:	November 3, 2016
PTA Expiration Date	November 3, 2019

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:	November 3, 2016
IC/Form PCTS Number:	1134045
Privacy Act Statement:	Choose an item. Click here to enter text.
PTA:	Choose an item.



PIA:	<p>System covered by existing PIA If covered by existing PIA, please list: DHS/USCG/PIA-022 Coast Guard Maritime Information eXchange, July 2015 If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>System covered by existing SORN If covered by existing SORN, please list: DHS/USCG-013 - Marine Information for Safety and Law Enforcement (MISLE) 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>The DHS Privacy Office finds that the Marine Transportation System Recovery Essential Elements of Information form, which collects business contact information (including related PII) in order to determine the status waterfront businesses and facilities following a man-made or natural disaster, represents a privacy sensitive collection of information and requires both PIA and SORN coverage. The form contains a Privacy Act statement. PIA coverage is provided DHS/USCG/PIA-022 Coast Guard Maritime Information eXchange, which describes the Coast Guards use of PII as part of its provision of maritime-related information the public, as well as federal, state, and local governments. SORN coverage is provided by DHS/USCG-013 - Marine Information for Safety and Law Enforcement (MISLE), which outlines the Coast Guard’s collection and maintenance of 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 identify and address safety, security and environmental risks and to establish vessel eligibility for documentation as a U.S. flag vessel.</p>	