

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: CG11410

Form Title: Marine Transportation System Recovery Essential Elements of

Information

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 1625-NEW OMB Expiration MM/DD/YYYY

Number: Date:

Collection status: New Collection Date of last PTA (if N/A.

applicable):

PROJECT OR PROGRAM MANAGER

Name:	Timothy Mann		
Office:	Atlantic Area (L-544)	Title:	Port Security Specialist
Phone:	850-279-6372	Email:	Timothy.F.Mann@uscg.mil



COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Anthony Smith		
Office:	CG-612	Title:	PRA Manager
Phone:	202-475-3532	Email:	anthony.d.smith@uscg.mil

SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

a. Describe the purpose of the information collection or form. 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).

If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.

The U.S. Coast Guard is required to take action to prevent damage to, or the destruction of, bridges, other structures, on or in navigable waters or shore area adjacent; to minimize damage from and respond to a transportation security incident; and to safeguard against destruction of vessels, harbors, ports and waterfront facilities in the United States and all territorial waters during a national emergency. To be prepared to execute these responsibilities, the U.S. Coast Guard needs to establish the normal fully functioning condition of a port prior to a port disruption. Then, following a port disruption, the USCG may be able to compare the normal port condition to the disrupted port condition, to assist in prioritizing recovery efforts, and gauge the effectiveness of the response.

b. List the DHS (or component) authorities to collect, store, and use this information. *If* this information will be stored and used by a specific DHS component, list the component-specific authorities.

USCG Authorities: 33 U.S.C. §1225, 46 U.S.C. §70103, and 50 U.S.C. §191.

2. Describe the IC/Form		
a. Does this form collect	x Yes	
any Personally	□ No	
Identifiable		
Information" (PII ¹)?		

Privacy Threshold Analysis - IC/Form

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.



b. From which type(s) of	x Members of the public		
individuals does this	x U.S. citizens or lawful permanent residents		
form collect	□ Non-U.S. Persons.		
information? (Check all	☐ DHS Employees		
that apply.)	☐ DHS Contractors		
	\square Other federal employees or contractors.		
c. Who will complete and	\Box The record subject of the form (e.g., the individual		
submit this form?	applicant).		
(Check all that apply.)	\square Legal Representative (preparer, attorney, etc.).		
	x Business entity.		
	If a business entity, is the only information		
	collected business contact information?		
	x Yes		
	\square No		
	\square Law enforcement.		
	\square DHS employee or contractor.		
	\Box Other individual/entity/organization that is NOT		
	the record subject. Please describe.		
	Click here to enter text.		
d. How do individuals	x Paper.		
complete the form?	x Electronic. (ex: fillable PDF)		
Check all that apply.	x Online web form. (available and submitted via the		
	internet)		
	Provide link:		
	https://cg.portal.uscg.mil/units/lantarea/lant-		
	<u>5/LANT54/LANT544/LANT544%20Documents/MTS%</u>		
	20Recovery/CG11410.pdf		
147			
	IS collect on the form? <i>List all PII data elements on the form.</i>		
	rmation from more than one type of individual, please break		
•	down list of data elements collected by type of individual.		
Business point of c ontact information (i.e., name, work telephone, and work email information) and vessel and cargo information. This information is requested on a			
· · · · · · · · · · · · · · · · · · ·	ilatory requirement compelling the business to provide		
the information.	matory requirement compening the business to provide		
are minormation.			



tr			
f.	the state of the s		
	alone Se	nsitive Personall	y Identifiable Information (SPII)? <i>N/A</i> .
	Social Sec	curity	\square DHS Electronic Data Interchange Personal Identifier
nı	ımber		(EDIPI)
	Alien Nur	nber (A-	☐ Social Media Handle/ID
N	umber)		\square Known Traveler Number
	Tax Ident	ification	\square Trusted Traveler Number (Global Entry, Pre-Check,
Nı	umber		etc.)
	Visa Num	ber	☐ Driver's License Number
	Passport	Number	☐ Biometrics
	Bank Acc	ount, Credit	
Ca	ard, or othe	er financial	
ac	count nun	nber	
	Other. <i>Ple</i>	ase list:	
g.	List the s	specific authorit	y to collect SSN or these other SPII elements.
N/A.			
h.	How will	this information	n be used? What is the purpose of the collection? Describe
			I is the minimum amount of information necessary to
	accompli	ish the purpose o	of the program.
N/A.			
i.	Are	x Yes. Pleas	e describe how notice is provided.
	individ	The form is	marked with a Privacy Act Statement on the bottom. It is
	uals	clearly visib	le to the Business POC who is voluntarily providing the
	provid	information	•
	ed	\square No.	
	notice		
	at the		
	time of		
	collecti		
	on by		
	DHS		
	(Does		
	the		
	records		
	subject		



have	
notice	
of the	
collecti	
on or is	
form	
filled	
out by	
third	
party)?	

3. How will DHS store the IC/form responses? a. How will DHS store ☐ Paper. Please describe. the original, Click here to enter text. completed IC/forms? x 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 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 Essential Elements of Information (EEI) data to allow the CG to ask follow-up questions (if necessary) prior to entry of the facility info into the data base. ☐ Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. **b.** If electronic, how x Manually (data elements manually entered). Please does DHS input the describe. responses into the IT A port recovery planner inputs the facility data system? manually and saves it as the Ports Baseline data.



	☐ Automatically. Please describe. Click here to enter text.	
c. How would a user search the information submitted on the forms, i.e., how is the information retrieved?	☐ By a unique identifier. Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text. x By a non-personal identifier. Please describe. Information is retrieved by the facility/ business name.	
d. What is the records retention schedule(s)? Include the records schedule number.	NARA retention schedule number N1-026-05-015	
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	As records are maintained in the CART database, disposal/deletion is in accordance with the business rules for the database.	
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>		
	d with other DHS components or offices. Please describe.	
	d external to DHS with other federal agencies, state/local tners, or non-governmental entities. Please describe.	
Only facility information is shared-no PII information from the business POC is		

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.

Privacy Threshold Analysis - IC/Form



retained in the data base. Information is only shared with Federal, State, and local
agencies with a need to know following a port disruption.
\square No. Information on this form is not shared outside of the collecting office.



Please include <u>a copy of the referenced form and Privacy Act Statement</u> (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? (Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)	 ☐ Yes. Please include it with this PTA submission. X No. Please describe why not. This form has been in previous existence. The PAS can be found at the bottom of the form.
CG-Form 11410 (i.e. Marine Transportation System Recovery Essential Elements of Information) is used to determine the status vessels and cargo within a port 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. Authorized USCG officials input 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. This collection is covered by DHS/USCG/PIA-022 and DHS/USCG-013.	



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	e IC or	Yes. If "no" PTA adjudication is complete.	
Form:			
Determination:		☐ PTA sufficient at this time.	
		☐ Privacy compliance documentation determination in progress.	
		☐ New information sharing arrangement is required.	
		☐ DHS Policy for Computer-Readable Extracts Containing SPII	
		applies.	
		☑ Privacy Act Statement required.	
		☑ Privacy Impact Assessment (PIA) required.	
		☑ System of Records Notice (SORN) required.	
		☐ Specialized training required.	
		☐ Other. Click here to enter text.	
DHS IC/Forms R	eview:	DHS PRIV has approved this ICR/Form.	
Date IC/Form		November 3, 2016	
Approved by PR	IV:		
IC/Form PCTS		1134045	
Number:			
Privacy Act Choose		e an item.	
Statement: Click he		ere to enter text.	
PTA: Choose		e an item	



PIA:	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.
SORN:	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.

DHS Privacy Office Comments:

Please describe rationale for privacy compliance determination above.

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 vessels and cargo within a port 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.