



## 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.

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**Form Number:** N/A

**Form Title:** N/A

**Component:** U.S. Coast Guard (USCG)    **Office:** CG-REG

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

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**Collection Title:** Commercial Fishing Industry Vessel Safety Regulations

**OMB Control Number:** 1625-0061                      **OMB Expiration Date:** March 31, 2019

**Collection status:** Extension                      **Date of last PTA (if applicable):** N/A

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

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**Name:** Mr. David Du Pont

**Office:** CG-REG                                      **Title:** Reg Dev Mgr

**Phone:** 202-372-1497                              **Email:** [David.A.DuPont@uscg.mil](mailto:David.A.DuPont@uscg.mil)

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

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**Name:** Mr. Anthony Smith

**Office:** CG-612                                      **Title:** PRA Coordinator

**Phone:** 202-475-3532                              **Email:** [Anthony.D.Smith@uscg.mil](mailto:Anthony.D.Smith@uscg.mil)

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## SPECIFIC IC/Forms PTA QUESTIONS

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

The purpose of the information collection is to ensure that each owner/operator of a commercial fishing vessel can assess the safety of their vessels and document compliance with safety regulations. This information is also used by the Coast Guard to determine compliance of fishing vessels requirements.

For a request for a waiver of the citizenship requirements for crewmembers on commercial fishing vessels, the information is used by the CG to determine whether or not to grant relief from the requirements.

For this information collection we collect basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual. Additionally, records maintained onboard or submitted to the Coast Guard may include the name and position of crewmembers. For a request for a waiver of the citizenship requirements, submissions include prospective crewmember name, nationality, birth place, position to be held and employment authorization.

The authority for this collection is 46 U.S.C. Chapter 45, 46 U.S.C. 6104, 46 U.S.C. 8103 and 46 U.S.C. 10603.

### 2. Describe the IC/Form

<b>a.</b> Does this form collect any Personally Identifiable Information” (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Non-U.S. Persons.  <input type="checkbox"/> DHS Employees  <input type="checkbox"/> DHS Contractors

<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"/> Other federal employees or contractors.
<p><b>c.</b> 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. If a business entity, is the only information collected business contact information? <input checked="" 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 <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 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><b>e.</b> What information will DHS collect on the form?</p>	
<p>The records contain basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual.</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"/> 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



<input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input type="checkbox"/> Other. <i>Please list:</i>		Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <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. Click here to enter text. <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 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. The records that the Coast Guard receives are maintained in Marine Information for Safety and Law Enforcement (MISLE) database.
<b>b.</b> If electronic, how does DHS input the	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe.



<p>responses into the IT system?</p>	<p>A scanned record is uploaded to the vessel-specific file in MISLE.</p> <p><input type="checkbox"/>Automatically. Please describe. Click here to enter text.</p>
<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. Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> A search can be done using vessel-specific information.</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 the life of the vessel; NARA retention schedule number N1-026-05-015.</p>
<p><b>e.</b> 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><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. Click here to enter text.</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>	Kenlinishia Tyler
<b>Date submitted to component Privacy Office:</b>	February 14, 2019
<b>Date submitted to DHS Privacy Office:</b>	February 22, 2019
<b>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.)</b>	<input type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. <p style="margin-left: 40px;">There are no forms associated with this collection.</p>
<b>Component Privacy Office Recommendation:</b>	
<i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
<p>The purpose of the information collection Commercial Fishing Industry Vessel Safety Regulations (1625-0061) is to ensure that each owner/operator of a commercial fishing vessel can assess the safety of their vessels and document compliance with safety regulations. This information is also used by the Coast Guard to determine compliance of fishing vessels requirements.</p> <p>For a request for a waiver of the citizenship requirements for crewmembers on commercial fishing vessels, the information is used by the CG to determine whether or not to grant relief from the requirements.</p> <p>There is no form associated with this collection. For this information collection we collect basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual. Additionally, records maintained onboard or submitted to the Coast Guard may include the name and position of crewmembers. For a request for a waiver of the citizenship requirements, submissions include prospective crewmember name, nationality, birth place, position to be held and employment authorization.</p>	





# Homeland Security

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

DHS/USCG/PIA-008, DHS/USCG/PIA-015, DHS/USCG-030 and DHS/USCG-013 provides coverage/notice for this collection.



## PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

<b>DHS Privacy Office Reviewer:</b>	<b>Riley Dean</b>
<b>PCTS Workflow Number:</b>	Click here to enter text.
<b>Date approved by DHS Privacy Office:</b>	March 4, 2019
<b>PTA Expiration Date</b>	March 4, 2022

## DESIGNATION

<b>Privacy Sensitive IC or Form:</b>	<b>Yes. If “no” PTA adjudication is complete.</b>
<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>	Choose an item. Click here to enter text.
<b>PIA:</b>	System covered by existing PIA If covered by existing PIA, please list: DHS/USCG/PIA-008 MISLE DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System If a PIA update is required, please list: Click here to enter text.
<b>SORN:</b>	System covered by existing SORN If covered by existing SORN, please list: DHS/USCG-030 Merchant Seamen's Records If a SORN update is required, please list: Click here to enter text.
<b>DHS Privacy Office Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCG is submitting this PTA to discuss the Commercial Fishing Industry Vessel Safety Regulations information collection, which is associated with OMB Control Number 1625-0061. The purpose of this information collection is to ensure that each owner/operator of a commercial fishing vessel can assess the safety of their vessels and document compliance with safety regulations. This information is also used by USCG to determine compliance of fishing vessels requirements. Additionally, certificates of completion of training, which may be issued by the accepted instructors, will provide proof to USCG that they have completed the required training and that they are qualified to conduct the required drills and instruction. For this information collection USCG collects basic business contact information which may include the name and address of the vessel owner/operator, if owned/operated by an individual. Additionally, these training records maintained onboard or submitted to the Coast Guard may include the name and position of crewmembers.</p> <p>There is no form associated with this information collection, but the records that USCG receives are maintained in Marine Information for Safety and Law Enforcement (MISLE) database. Information is either received electronically or by paper, and is then scanned into MISLE. Records are retrieved by a vessel-specific search.</p> <p>PIA coverage can be found under DHS/USCG/PIA-008 MISLE, which outlines the risks of capturing information required to support the Coast Guard's marine safety, security, environmental protection, and law enforcement programs. SORN coverage is not</p>	



technically required as the information is retrieved by search using vessel-specific information. However, DHS/USCG-013 MISLE does provide notice of this type of information collection.

Additionally, for a request for a waiver of the citizenship requirements for crewmembers on commercial fishing vessels, additional information is used by USCG to determine whether or not to grant relief from the requirements. Submissions include prospective crewmember name, nationality, birth place, position to be held and employment authorization. There is also no form associated with this information collection.

PIA coverage is provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System, which specifically outlines the MMLD system and the information it collects. SORN coverage is provided by DHS/USCG-030 Merchant Seamen's Records, which allows for the collection of information in order to administer the Commercial Vessel Safety Program to determine domestic and international qualifications for the issuance of licenses, documents, and staff officer certifications. This includes establishing eligibility of a merchant mariner's document, duplicate documents, or additional endorsements issued by USCG.