



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:	CG-2633		
Form Title:	Application for Waiver and Waiver Order		
Component:	U.S. Coast Guard (USCG)	Office:	CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Applications for Vessel Inspection, Waiver, and Continuous Synopsis Record		
OMB Control Number:	1625-0002	OMB Expiration Date:	August 31, 2022
Collection status:	Extension	Date of last PTA (if applicable):	April 10, 2017

PROJECT OR PROGRAM MANAGER

Name:	Mr. David Du Pont		
Office:	CG-REG	Title:	Reg Dev Mgr
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COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	A.L. Craig		
Office:	CG-6P	Title:	PRA Coordinator
Phone:	202-475-3528	Email:	Albert.L.Craig@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.

The U.S. Coast Guard (USCG) is renewing the Information Collection Request (ICR) titled, 1625-0002: "Applications for Vessel Inspection, Waiver, and Continuous Synopsis Record."

The purpose of the form is to document an application for waiver. An application is voluntary and is only submitted when a vessel owner/operator desires a waiver from the navigation and vessel inspection requirements. The Coast Guard uses the information to determine if a waiver can be issued.

The Application for Waiver and Waiver Order (CG-2633) contains the vessel name, official vessel number, name of operator, vessel's employment, vessel description/identification data (if different from information on application), and waiver request/justification, and duration data. CG-2633 also contains the date, title, and signature of the applicant and the place, date, title, and signature of the USCG Issuing Officer.

The Application for Waiver and Waiver Order (CG-2633) is uploaded into the facility-specific file in the Marine Information for Safety and Law Enforcement system.

Records associated with this collection are maintained in accordance with NARA retention schedule number N1-026-05-015.

b. List the DHS (or Component) authorities to collect, store, and use this information.

46 U.S. Code 3306 and 33 CFR Part 19.06 are the authorities for this collection.

2. Describe the IC/Form



a. Does this form collect any Personally Identifiable Information” (PII ¹)?	<input checked="" type="checkbox"/> Yes <input 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/Contractors (list Components) <input type="checkbox"/> Other federal employees or contractors
c. Who will complete and submit this form? (Check all that apply.)	<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="margin-left: 40px;">If a business entity, is the only information collected business contact information?</p> <p style="margin-left: 80px;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee/contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.
d. How do individuals complete the form? Check all that apply.	<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>
e. What information will DHS collect on the 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.



The Application for Waiver and Waiver Order (CG-2633) contains the vessel name, official vessel number, name of operator, vessel's employment, vessel description/identification data (if different from information on application), and waiver request/justification, and duration data. CG-2633 also contains the date, title, and signature of the applicant and the place, date, title, and signature of the USCG Issuing Officer.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? No.

- | | |
|--|--|
| <input type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange |
| <input type="checkbox"/> Alien Number (A-Number) | Personal Identifier (EDIPI) |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Social Media Handle/ID |
| <input type="checkbox"/> Visa Number | <input type="checkbox"/> Known Traveler Number |
| <input type="checkbox"/> Passport Number | <input type="checkbox"/> Trusted Traveler Number (Global |
| <input type="checkbox"/> Bank Account, Credit Card, or other | Entry, Pre-Check, etc.) |
| financial account number | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Other. <i>Please list:</i> | <input type="checkbox"/> Biometrics |

g. List the **specific authority** to collect SSN or these other SPII elements.

N/A

h. Is SSN necessary to carry out the functions of this form and/or fulfill requirements of the information collection?

N/A

i. How will this information be used? What is the purpose of the collection?

The purpose of the form is to document an application for waiver. An application is voluntary and is only submitted when a vessel owner/operator desires a waiver from the navigation and vessel inspection requirements. The Coast Guard uses the information to determine if a waiver can be issued.

j. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of*

- Yes. Please describe how notice is provided.
- No. Information is not retrieved by a personal identifier.



<p><i>the collection or is form filled out by third party)?</i></p>	
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3. How will DHS store the IC/form responses?	
<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Forms the Coast Guard receive are maintained in the Marine Information for Safety and Law Enforcement (MISLE) database.</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 scanned form is uploaded to the vessel-specific file in MISLE.</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> A search is done using vessel-specific information.</p>
<p>d. What is the records retention</p>	<p>A record is retained for the life of the vessel; NARA retention schedule number N1-026-05-015.</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.



<p>schedule(s)? <i>Include the records schedule number.</i></p>	
<p>e. 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 of the database.</p>
<p>f. Is any of this information shared outside of the original program/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. Click here to enter text.</p> <p><input checked="" 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:	A.L. Craig
Date submitted to Component Privacy Office:	August 22, 2022
Concurrence from other Components involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	August 26, 2022
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. Information is not retrieved by a personal identifier.
Component Privacy Office Recommendation: <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>	
<p>The U.S. Coast Guard (USCG) is renewing the Information Collection Request (ICR) titled, 1625-0002: "Applications for Vessel Inspection, Waiver, and Continuous Synopsis Record."</p> <p>The purpose of the form is to document an application for waiver. An application is voluntary and is only submitted when a vessel owner/operator desires a waiver from the navigation and vessel inspection requirements. The Coast Guard uses the information to determine if a waiver can be issued.</p> <p>The Application for Waiver and Waiver Order (CG-2633) contains the vessel name, official vessel number, name of operator, vessel's employment, vessel description/identification data (if different from information on application), and waiver request/justification, and duration data. CG-2633 also contains the date, title, and signature of the applicant and the place, date, title, and signature of the USCG Issuing Officer.</p>	



The Application for Waiver and Waiver Order (CG-2633) is uploaded into the facility-specific file in the Marine Information for Safety and Law Enforcement system.

CG-2633 is privacy sensitive-coverage is provided by DHS/USCG/PIA-008, Marine Information for Safety and Law Enforcement.



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Kattina Do
PCTS Workflow Number:	0023062
Date approved by DHS Privacy Office:	August 26, 2022
PTA Expiration Date	August 26, 2025

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 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 checked="" type="checkbox"/> Other. Privacy Notice
Privacy Act Statement:	Choose an item. Click here to enter text.
System PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA If covered by existing PIA, please list: <ul style="list-style-type: none"> DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) If a PIA update is required, please list: Click here to enter text.
SORN:	If covered by existing SORN, please list: Click here to enter text. 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 CG 2633 (Application for Waiver and Waiver Order) is a privacy-sensitive collection. The application is used by vessel owners/operators to request a waiver for navigation and vessel inspection requirements. The form collects basic business contact information, which may include the name and address of the vessel owner/operator, if it is owned/operated by an individual.

The Privacy Office finds that PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE), which assess the privacy risks associated with the Coast Guard's use of PII in support of marine safety, security, environmental protection and law enforcement programs. PRIV also finds that 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 information in order to establish a 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.

Update 1:

USCG is submitting this updated PTA to discuss the Applications for Vessel Inspection, Waiver, and Continuous Synopsis Record; Form CG-2633. The purpose of the form is to document an application for waiver. An application is voluntary and is only submitted when a vessel owner/operator desires a waiver from the navigation and vessel inspection requirements.

The Application for Waiver and Waiver Order (CG-2633) contains the vessel name, official vessel number, name of operator, vessel's employment, vessel description/identification data (if different from information on application), and waiver request/justification, and duration data. CG-2633 also contains the date, title, and signature of the applicant and the place, date, title, and signature of the USCG Issuing Officer.

The DHS Privacy Office (PRIV) agrees that this form is privacy-sensitive, requiring PIA coverage because PII is collected from members of the public.



PRIV agrees with USCG Privacy that PIA coverage is provided by 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.

PRIV agrees with USCG Privacy that SORN coverage is not required because information is not retrieved by a personal identifier. However, SORN coverage is provide by DHS/USCG-013 MISLE, which provides notice of this type of information collection.

USCG is required to update the form with the Privacy Notice attached to this PTA.