



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-9191		
Form Title:	International Ballast Water Management Certificate (Statement of Voluntary Compliance)		
Component:	U.S. Coast Guard (USCG)	Office:	CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Various International Agreement Pollution Prevention Certificates and Documents, and Equivalency Certificates		
OMB Control Number:	1625-0041	OMB Expiration Date:	July 31, 2023
Collection status:	Extension	Date of last PTA (if applicable):	May 16, 2019

PROJECT OR PROGRAM MANAGER

Name:	Mr. David Du Pont		
Office:	CG-REG	Title:	Reg Dev Mgr
Phone:	202-372-1497	Email:	David.A.DuPont@uscg.mil

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, 1625-0041: "Various International Agreement Pollution Prevention Certificates and Documents, and Equivalency Certificates."

The purpose of the International Ballast Water Management Certificate (Statement of Voluntary Compliance) (CG-9191) form is to certify that the vessel meets certain International Convention for the Control and Management of Ships' Ballast Water and Sediments requirements. The Coast Guard issues this form to document compliance with the requirements.

CG-9191 includes the signature of the authorized official issuing or endorsing the Certificate, port of issue (i.e., where authorizing official endorsed certificate), and vessel-specific information, such as—vessel name, distinctive numbers or letters, port of registry, gross tonnage, and International Maritime Organization (IMO) number.

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

The authority for this collection is 33 U.S. Code 1251.

2. Describe the IC/Form

a. Does this form collect any Personally Identifiable Information" (PII¹)?

Yes

No

b. From which type(s) of individuals does this form collect information? (Check all that apply.)

Members of the public

U.S. citizens or lawful permanent residents

Non-U.S. Persons

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.



	<input checked="" type="checkbox"/> DHS Employees/Contractors (list Components) USCG Authorizing Official <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 type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input checked="" 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.
<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>CG-9191 includes the signature of the authorized official issuing or endorsing the Certificate, port of issue (i.e., where authorizing official endorsed certificate), and vessel-specific information, such as—vessel name, distinctive numbers or letters, port of registry, gross tonnage, and IMO number.</p>	
<p>f. 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"/> DHS Electronic Data Interchange 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 Entry, Pre-Check, etc.)
<input type="checkbox"/> Bank Account, Credit Card, or other 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 International Ballast Water Management Certificate (Statement of Voluntary Compliance) (CG-9191) form is to certify that the vessel meets certain International Convention for the Control and Management of Ships' Ballast Water and Sediments requirements. The Coast Guard issues this form to document compliance with the requirements.	
j. 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. A Privacy Notice will be posted on the CG form. <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 type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.



	<p>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.</p> <p>Forms that the Coast Guard creates are maintained in 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.</p> <p>A scanned record is uploaded to the vessel-specific file in MISLE.</p> <p><input type="checkbox"/> Automatically. Please describe.</p> <p>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.</p> <p>Click here to enter text.</p> <p><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i></p> <p>A search can be done using vessel-specific information.</p>
<p>d. 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>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 for the database.</p>
<p>f. Is any of this information shared outside of the original program/office?</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.



- 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.
Click here to enter text.

- 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.



PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	A.L. Craig
Date submitted to Component Privacy Office:	April 19, 2023
Concurrence from other Components involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	May 5, 2023
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. However, a Privacy Notice will be posted on the CG-Form.

Component Privacy Office Recommendation:
Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.

The U.S. Coast Guard (USCG) is renewing the Information Collection Request (ICR) titled, 1625-0041: "Various International Agreement Pollution Prevention Certificates and Documents, and Equivalency Certificates."

The purpose of the International Ballast Water Management Certificate (Statement of Voluntary Compliance) (CG-9191) form is to certify that the vessel meets certain International Convention for the Control and Management of Ships' Ballast Water and Sediments requirements. The Coast Guard issues this form to document compliance with the requirements.

CG-9191 includes the signature of the authorized official issuing or endorsing the Certificate, port of issue (i.e., where authorizing official endorsed certificate), and vessel-specific information, such as—vessel name, distinctive numbers or letters, port of registry, gross tonnage, and IMO number.



Records related to CG-9191 are maintained in accordance with NARA retention schedule number N1-026-05-015 and located in the facility or vessel-specific file in the Marine Information for Safety and Law Enforcement (MISLE) database.

The International Ballast Water Management Certificate (Statement of Voluntary Compliance) is privacy sensitive-coverage is provided by DHS/USCG/PIA-008 (MISLE).



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Brian Pochatila
PCTS Workflow Number:	0014427
Date approved by DHS Privacy Office:	May 8, 2023
PTA Expiration Date	May 8, 2026
DHS Privacy Office Approver (if applicable):	Riley Dean

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 type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Specialized training required. <input type="checkbox"/> Other. Click here to enter text.
Privacy Act Statement:	e(3) statement currently accurate. PN submitted and approved.
System PTA:	Choose an item. Click here to enter text.
PIA:	System covered by existing PIA If covered by existing PIA, please list: 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:	Choose an item. 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.

USCG is renewing the Information Collection Request (ICR) titled, 1625-0041: “Various International Agreement Pollution Prevention Certificates and Documents, and Equivalency Certificates.” The purpose of the International Ballast Water Management Certificate (Statement of Voluntary Compliance) (CG-9191) form is to certify that the vessel meets certain International Convention for the Control and Management of Ships' Ballast Water and Sediments requirements. The Coast Guard issues this form to document compliance with the requirements.

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Records related to CG-9191 are maintained in accordance with NARA retention schedule number N1-026-05-015 and located in the facility or vessel-specific file in the Marine Information for Safety and Law Enforcement (MISLE) database.

DHS Privacy concurs that the International Ballast Water Management Certificate (Statement of Voluntary Compliance) is privacy sensitive requiring PIA coverage. DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) captures information required to support the Coast Guard's marine safety, security, environmental protection and law enforcement programs. SORN coverage is not required because information is not retrieved by unique identifiers.