



PRIVACY THRESHOLD ANALYSIS (PTA)

This form will be used to determine whether a Privacy Impact Assessment (PIA), System of Records Notice (SORN), or other privacy compliance documentation is required under the E-Government Act of 2002, the Homeland Security Act of 2002, the Privacy Act of 1974, or DHS policy.

Please complete this form and send it to your Component Privacy Office. If you are unsure of your Component Privacy Office contact information, please visit <https://www.dhs.gov/privacy-office-contacts>. If you do not have a Component Privacy Office, please send the PTA to the DHS Privacy Office:

Senior Director, Privacy Compliance
DHS Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717

PIA@hq.dhs.gov

Your Component Privacy Office will submit the PTA on behalf of your office. Upon receipt from your Component Privacy Office, the DHS Privacy Office will review this form. If a PIA, SORN, or other privacy compliance documentation is required, your Component Privacy Office, in consultation with the DHS Privacy Office, will send you a copy of the template to complete and return.

For more information about the DHS Privacy compliance process, please see <https://www.dhs.gov/compliance>. A copy of the template is available on DHS Connect at <http://dhsconnect.dhs.gov/org/offices/priv/Pages/Privacy-Compliance.aspx> or directly from the DHS Privacy Office via email: PIA@hq.dhs.gov or phone: 202-343-1717.



PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project, Program, or System Name:	Pilots' Medical Certificate Validity Period		
Component or Office:	U.S. Coast Guard (USCG)	Office or Program:	CG-MMC
FISMA Name (if applicable):	N/A	FISMA Number (if applicable):	N/A
Type of Project or Program:	Rule	Project or program status:	Modification
Date first developed:	November 2, 2020	Pilot launch date:	N/A
Date of last PTA update	April 28, 2021	Pilot end date:	N/A
ATO Status (if applicable):¹	N/A	Expected ATO/ATP/OA date (if applicable):	N/A

PROJECT, PROGRAM, OR SYSTEM MANAGER

Name:	Mr. Eric Malzkuh		
Office:	CG-MMC	Title:	Marine Transportation Specialist
Phone:	202-372-1425	Email:	Eric.F.Malzkuhn@uscg.mil

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	N/A		
Phone:	N/A	Email:	N/A

¹ The DHS OCIO has implemented a streamlined approach to authorizing an Authority to Operate (ATO), allowing for rapid deployment of new IT systems and initiate using the latest technologies as quickly as possible. This approach is used for selected information systems that meet the required eligibility criteria in order to be operational and connect to the network. For more information, see <http://dhsconnect.dhs.gov/org/comp/mgmt/ocio/ciso/CISO%20ALL%20Documents/Authority%20to%20Proceed%20Memo%20Phase%20II.pdf>.



**Homeland
Security**

Privacy Office
U.S. Department of Homeland Security
Washington, DC 20528
202-343-1717, pia@hq.dhs.gov
www.dhs.gov/privacy

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SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

The U.S. Coast Guard (USCG) submits this PTA as part of the rulemaking process.

The USCG is extending the maximum period of validity of merchant mariner medical certificates issued to first-class pilots and masters or mates serving as pilot from 2 years to 5 years. This rule will reduce the frequency of medical certification application submissions to the Coast Guard.

First-class pilots and masters and mates who serve as pilot on vessels of 1,600 gross registered tons or more must submit the results of their annual physical examinations to the Coast Guard between medical certificate applications if:

- (1) the mariner does not meet the physical ability requirements;
- (2) the mariner has a condition that does not meet the medical, vision, or hearing requirements;
- (3) the mariner is deemed “not recommended” by a medical practitioner for a medical certificate;
- (4) upon request by the USCG, the rule will not compromise safety because it maintains the requirement for pilots to obtain annual physicals and because it provides the Coast Guard opportunity to review the medical examination of pilots who may become medically unqualified between medical certificate applications.

The Application for Merchant Mariner Medical Certificate (CG-719K/E) is used to valid physical examinations. The Coast Guard uses an alternate unique identifier for existing mariners called a Mariner Reference Number. The Social Security number (SSN) is only required for new initial applicants who have not previously been issued a merchant mariner credential from the USCG.

CG-719K/E collects the following personally identifiable information from the mariner:

- name;
- home address;
- date of birth;
- gender;
- Social Security number (**only required for new initial applicants that have not been issued a merchant mariner credential**)
- Mariner Reference Number;
- physical traits; physical ability results; and
- signature.

CG-719K/E also contains the name, business address, phone number, and license number of the medical practitioner and the name, address, and phone number of the organization or third party that the mariner elects to release information associated with this form.



The Pilots' Medical Certificate Validity Period Final Rule is privacy sensitive with coverage provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System and DHS/USCG-030 Merchant Seamen's Records.

2. From whom does the Project, Program, or System collect, maintain, use, or disseminate information?

Please check all that apply.

This project does not collect, collect, maintain, use, or disseminate any personally identifiable information²

Members of the public

U.S. Persons (U.S citizens or lawful permanent residents)

Non-U.S. Persons

DHS Employees/Contractors (list Components):
Click here to enter text.

Other federal employees or contractors (list agencies): *Click here to enter text.*

² DHS defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that 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. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.



<p>2(a) Is information meant to be collected from or about sensitive/protected populations?</p>	<p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> 8 USC § 1367 protected individuals (e.g., T, U, VAWA)³</p> <p><input type="checkbox"/> Refugees/Asylees</p> <p><input type="checkbox"/> Other. Please list: <i>Click here to enter text.</i></p>
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<p>3. What specific information about individuals is collected, maintained, used, or disseminated?</p>	
<p>The Application for Merchant Mariner Medical Certificate (CG-719K/E) is used to valid physical examinations. CG-719K/E collects the following personally identifiable information from the mariner:</p> <ul style="list-style-type: none"> name; home address; date of birth; gender; Mariner Reference Number; Social Security number (only required for new initial applicants that have not been issued a merchant mariner credential); physical traits; physical ability results; and signature. <p>CG-719K/E also contains the name, business address, phone number, and license number of the medical practitioner and the name, address, and phone number of the organization or third party that the mariner elects to release information associated with this form.</p>	
<p>3(a) Does this Project, Program, or System collect, maintain, use, or disseminate Social Security numbers (SSN) or other types of stand-alone sensitive information?⁴ If applicable, check all that apply.</p>	
<p><input checked="" type="checkbox"/> Social Security number</p> <p><input type="checkbox"/> Alien Number (A-Number)</p> <p><input type="checkbox"/> Tax Identification Number</p>	<p><input type="checkbox"/> Social Media Handle/ID</p> <p><input type="checkbox"/> Driver's License/State ID Number</p>

³ This involves the following types of individuals: T nonimmigrant status (Victims of Human Trafficking), U nonimmigrant status (Victims of Criminal Activity), or Violence Against Women Act (VAWA). For more information about 1367 populations, please see: DHS Management Directive 002-02, Implementation of Section 1367 Information Provisions, available at <http://dhsconnect.dhs.gov/org/comp/mgmt/policies/Directives/002-02.pdf>.

⁴ Sensitive PII (or sensitive information) is PII that if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. More information can be found in the DHS Handbook for Safeguarding Sensitive Personally Identifiable Information, available at <https://www.dhs.gov/publication/handbook-safeguarding-sensitive-personally-identifiable-information>.



<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"/> Medical Information (e.g., Protected Health Information (PHI)) <input type="checkbox"/> Biometric identifiers (e.g., FIN, EID) <input type="checkbox"/> Biometrics. ⁵ Please list modalities (e.g., fingerprints, DNA, iris scans): Click here to enter text. <input type="checkbox"/> Other. Please list: Click here to enter text.
3(b) Please provide the specific legal basis for the collection of SSN:	Click here to enter text.
3(c) If the SSN is needed to carry out the functions and/or fulfill requirements of the Project, System, or Program, please explain why it is necessary and how it will be used.	
<p>The purpose of this system is to administer the Merchant Mariner Credentialing Program to determine domestic and international qualifications for the issuance of seaman credentials with domestic and international endorsements, licenses, documents, and staff officer certifications.</p> <p>The collection ensures that merchant mariners are physically qualified in an efficient manner to perform their duties for the purpose of: promoting the safety of life and property at sea, promoting public safety, protecting the marine environment and promoting homeland security.</p> <p>This includes establishing eligibility for a merchant mariner’s credential, duplicate credential, or additional endorsements issued by the USCG and establishing and maintaining continuous records of the person’s documentation transactions.</p>	
3(d) If the Project, Program, or System requires the use of SSN, what actions are being taken to abide by Privacy Policy Instruction 047-01-010, SSN Collection and Use Reduction,⁶ which requires the use of privacy-enhancing SSN alternatives when there are technological, legal, or regulatory limitations to eliminating the SSN? Note: even if you are properly authorized to collect SSNs, you are required to use an alternate unique identifier. If there are technological, legal, or regulatory limitations to eliminating the SSN, privacy-enhancing alternatives should be taken, such as masking, truncating, or encrypting the SSN, or blocking the display of SSNs in hard copy or digital formats.	

⁵ If related to IDENT/HART and applicable, please complete all Data Access Request Analysis (DARA) requirements. This form provides privacy analysis for DHS’ IDENT, soon to be HART. The form replaces a PTA where IDENT is a service provider for component records. PRIV uses this form to better understand how data is currently shared, will be shared and how data protection within IDENT will be accomplished. IDENT is a biometrics service provider and any component or agency submitting data to IDENT is a data provider.

⁶ See <https://www.dhs.gov/publication/privacy-policy-instruction-047-01-010-ssn-collection-and-use-reduction>.



The Coast Guard uses an alternate unique identifier for existing mariners called a Mariner Reference Number. The SSN is only required for new initial applicants who do have not previously been given a credential from the USCG.

<p>4. How does the Project, Program, or System retrieve information?</p>	<p><input checked="" type="checkbox"/> By a unique identifier.⁷ Please list all unique identifiers used: Information is retrieved by any combination of the various which may include the name, address, Social Security number, and Merchant Mariner Licensing and Documentation System assigned system number.</p> <p><input type="checkbox"/> By a non-unique identifier or other means. Please describe: <i>Click here to enter text.</i></p>
<p>5. What is the records retention schedule(s) for the information collected for each category type (include the records schedule number)? <i>If no schedule has been approved, please provide proposed schedule or plans to determine it.</i></p> <p><i>Note: If no records schedule is in place or are unsure of the applicable records schedule, please reach out to the appropriate Records Management Office.⁸</i></p>	<p>SSIC 16720</p> <p>Destroy 60 years after last discharge or evidence of death is reviewed, whichever is sooner.</p>
<p>5(a) How does the Project, Program, or System ensure that records are disposed of or deleted in accordance with the retention schedule (e.g., technical/automatic purge, manual audit)?</p>	<p>Quarterly the HSC Records Coordinator will contact appropriate program managers regarding any of their scheduled records due for destruction. It is essential that owners of records have an opportunity to indicate if subject records might be required for impending litigation or some other need. Even if records have met their specified retention periods, they cannot be destroyed without <i>the concurrence of</i></p>

⁷ 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.

⁸ See <http://dhsconnect.dhs.gov/org/comp/mgmt/ocio/IS2O/rm/Pages/RIM-Contacts.aspx>



	the program manager having legal custody of the records.
6. Does this Project, Program, or System connect, receive, or share PII with any other DHS/Component projects, programs, or systems?⁹	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: <i>Click here to enter text.</i>
7. Does this Project, Program, or System connect, receive, or share PII with any external (non-DHS) government or non-government partners or systems?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: Information may be released to a third party if specific guidance is given to the National Maritime Center (NMC), by the applicant, regarding what issues may be discussed and with whom. The applicant must complete a Third Party Authorization for each entity or individual named.
8. Is this sharing pursuant to new or existing information sharing agreement (MOU, MOA, LOI, RTA, etc.)? If applicable, please provide agreement as an attachment.	N/A. Please describe applicable information sharing governance in place: <i>Click here to enter text.</i>
9. Does the Project, Program, or System or have a mechanism to track external disclosures of an individual's PII?	<input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <i>Click here to enter text.</i> <input checked="" type="checkbox"/> Yes. In what format is the accounting maintained: USCG FOIA/Privacy Act requests & the Merchant Mariner Licensing and Documentation System (MMLDS).
10. Does this Project, Program, or System use or collect data involving or from any of the following technologies:	<input type="checkbox"/> Social Media <input type="checkbox"/> Advanced analytics ¹⁰

⁹ PII may be shared, received, or connected to other DHS systems directly, automatically, or by manual processes. Often, these systems are listed as "interconnected systems" in IACS.

¹⁰ The autonomous or semi-autonomous examination of Personally Identifiable Information using sophisticated techniques and tools to draw conclusions. Advanced Analytics could include human-developed or machine-developed algorithms and encompasses, but is not limited to, the following: data mining, pattern and trend analysis, complex event processing, machine learning or deep learning, artificial intelligence, predictive analytics, big data analytics.



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	<input type="checkbox"/> Live PII data for testing <input checked="" type="checkbox"/> No
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<p>11. Does this Project, Program, or System use data to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly indicative of terrorist or criminal activity on the part of any individual(s) (i.e., data mining)?¹¹ This does not include subject-based searches.</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i></p>
<p>11(a) Is information used for research, statistical, or other similar purposes? If so, how will the information be de-identified, aggregated, or otherwise privacy-protected?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please elaborate: <i>Click here to enter text.</i></p>
<p>12. Does the planned effort include any interaction or intervention with human subjects¹² via pilot studies, exercises, focus groups, surveys, equipment or technology, observation of public behavior, review of data sets, etc. for research purposes</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please reach out to the DHS Compliance Assurance Program Office (CAPO) for <u>independent</u> review and approval of this effort.¹³</p>
<p>13. Does the Project, Program, or System provide role-based or additional privacy training for personnel who have access, <u>in addition</u> to annual privacy training required of all DHS personnel?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list: <i>Click here to enter text.</i></p>

¹¹ Is this a program involving pattern-based queries, searches, or other analyses of one or more electronic databases, where—
 (A) a department or agency of the Federal Government, or a non-Federal entity acting on behalf of the Federal Government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals;
 (B) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and
 (C) the purpose of the queries, searches, or other analyses is not solely—
 (i) the detection of fraud, waste, or abuse in a Government agency or program; or
 (ii) the security of a Government computer system.

¹² Human subject means a living individual about whom an investigator conducting research: (1) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (2) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.

¹³ For more information about CAPO and their points of contact, please see: <https://www.dhs.gov/publication/compliance-assurance-program-office> or <https://collaborate.st.dhs.gov/orgs/STCSSites/SitePages/Home.aspx?orgid=36>. For more information about the protection of human subjects, please see DHS Directive 026-04: https://www.dhs.gov/sites/default/files/publications/mgmt/general-science-and-innovation/mgmt-dir_026-04-protection-of-human-subjects_revision-01.pdf.



14. Is there a FIPS 199 determination?¹⁴	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High <input type="checkbox"/> Undefined
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PRIVACY THRESHOLD REVIEW

(TO BE COMPLETED BY COMPONENT PRIVACY OFFICE)

Component Privacy Office Reviewer:	A.L. Craig
Date submitted to Component Privacy Office:	April 14, 2022
Concurrence from other Component Reviewers involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	May 5, 2022
Component Privacy Office Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed, as well as any specific privacy risks/mitigations, as necessary.</i>	
<p>The USCG is extending the maximum period of validity of merchant mariner medical certificates issued to first-class pilots and masters or mates serving as pilot from 2 years to 5 years. This rule will reduce the frequency of medical certification application submissions to the Coast Guard.</p> <p>First-class pilots and masters and mates who serve as pilot on vessels of 1,600 gross registered tons or more must submit the results of their annual physical examinations to the Coast Guard between medical certificate applications if:</p>	

¹⁴ FIPS 199 is the [Federal Information Processing Standard](#) Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.



- (1) the mariner does not meet the physical ability requirements;
- (2) the mariner has a condition that does not meet the medical, vision, or hearing requirements;
- (3) the mariner is deemed “not recommended” by a medical practitioner for a medical certificate;
- (4) upon request by the USCG, the rule will not compromise safety because it maintains the requirement for pilots to obtain annual physicals and because it provides the Coast Guard opportunity to review the medical examination of pilots who may become medically unqualified between medical certificate applications.

The Pilots’ Medical Certificate Validity Period Final Rule is privacy sensitive with coverage provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System and DHS/USCG-030 Merchant Seamen’s Records.

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Brian Pochatila
DHS Privacy Office Approver (if applicable):	Riley Dean
Workflow Number:	0022474
Date approved by DHS Privacy Office:	May 5, 2022
PTA Expiration Date	May 5, 2025

DESIGNATION

Privacy Sensitive System:	Yes
Category of System:	Rule If “other” is selected, please describe: <i>Click here to enter text.</i>
Determination:	<input checked="" type="checkbox"/> Project, Program, System in compliance with full coverage <input type="checkbox"/> Project, Program, System in compliance with interim coverage <input type="checkbox"/> Project, Program, System in compliance until changes implemented <input type="checkbox"/> Project, Program, System not in compliance
PIA:	System covered by existing PIA DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System
SORN:	System covered by existing SORN DHS/USCG-030 Merchant Seamen's Records, June 25, 2009, 74 FR 30308
DHS Privacy Office Comments:	



Please describe rationale for privacy compliance determination above, and any further action(s) that must be taken by Component.

USCG is submitting this PTA to discuss the Pilots' Medical Certificate Validity Period Final Rule. The USCG is extending the maximum period of validity of merchant mariner medical certificates issued to first-class pilots and masters or mates serving as pilot from 2 years to 5 years. This rule will reduce the frequency of medical certification application submissions to the Coast Guard.

First-class pilots and masters and mates who serve as pilot on vessels of 1,600 gross registered tons or more must submit the results of their annual physical examinations to the Coast Guard between medical certificate applications if:

- (1) the mariner does not meet the physical ability requirements;
- (2) the mariner has a condition that does not meet the medical, vision, or hearing requirements;
- (3) the mariner is deemed "not recommended" by a medical practitioner for a medical certificate;
- (4) upon request by the USCG, the rule will not compromise safety because it maintains the requirement for pilots to obtain annual physicals and because it provides the Coast Guard opportunity to review the medical examination of pilots who may become medically unqualified between medical certificate applications.

The purpose of this system is to administer the Merchant Mariner Credentialing Program to determine domestic and international qualifications for the issuance of seaman credentials with domestic and international endorsements, licenses, documents, and staff officer certifications. This includes establishing eligibility for a merchant mariner's credential, duplicate credential, or additional endorsements issued by the USCG and establishing and maintaining continuous records of the person's documentation transactions. SSNs are only required for new initial applicants that have not been issued a merchant mariner credential

DHS Privacy concurs this Final Rule privacy sensitive requiring PIA and SORN coverage. PIA coverage provided by DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System, WHICH permits USCG to manage the issuance of credentials to Merchant Mariners and process and track merchant mariner applications.

DHS/USCG-030 Merchant Seamen's Records administers the Commercial Vessel Safety Program to determine domestic and international qualifications for the issuance of licenses, documents, and staff officer certifications.