



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:	N/A		
Form Title:	N/A		
Component:	U.S. Coast Guard (USCG)	Office:	CG-REG

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Course Approval and Records for Merchant Mariner Training Schools		
OMB Control Number:	1625-0028	OMB Expiration Date:	April 30, 2023
Collection status:	Extension	Date of last PTA (if applicable):	January 17, 2020

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, 1625-0028: "Course Approval and Records for Merchant Mariner Training Schools."

The purpose of the information collection is to determine if merchant mariner training schools meet minimal statutory requirements. The Coast Guard uses this information to approve the curriculum, facility and faculty for these schools, and to verify student course completion.

There is no form associated with this collection. The records contain business contact information, which may include the name and address of the training school owner/operator, if owned/operated by an individual. The records also include the names of course instructors and proctors, and the names of students that complete or dis-enroll from a course or program.

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

The authority for this collection is 46 U.S.C. 2103, 2104 and 7315.

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 type="checkbox"/> DHS Employees/Contractors (list Components) <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 checked="" type="checkbox"/> The record subject of the form (e.g., the individual applicant). <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No <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.
<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>The records contain business contact information, which may include the name and address of the training school owner/operator, if owned/operated by an individual. The records also include the names of course instructors and proctors, and the names of students that complete or dis-enroll from a course or program.</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 information collection is to determine if merchant mariner training schools meet minimal statutory requirements. The Coast Guard uses this information to approve the curriculum, facility and faculty for these schools, and to verify student course completion.

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 type="checkbox"/> Yes. Please describe how notice is provided. Click here to enter text. <input checked="" type="checkbox"/> No. Information is not retrieved by a personal identifier.
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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 checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.
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	<p>A CG course approval specialist enters information into a limited-access CG file server at the USCG National Maritime Center (NMC).</p> <p><input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> <p>Click here to enter text.</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 CG course approval specialist enters information into a limited-access CG file server at the USCG NMC.</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 CG course approval specialist would retrieve information using the training school or course name.</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 training school; NARA retention schedule number DAA-GRS-2013-0007-0012 (GRS 4.2, Item 130).</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with</p>	<p>Electronic records are disposed/deleted in accordance with the Agency business rules and the retention schedule.</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.



the retention schedule?	
f. Is any of this information shared outside of the original program/office?	
<input type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Click here to enter text.	
<input checked="" 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. To aid mariners, course approval information is available at https://www.dco.uscg.mil/portals/9/NMC/pdfs/courses/courses.pdf	
<input type="checkbox"/> 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:	October 26, 2022
Concurrence from other Components involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	January 17, 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.
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, 1625-0028: "Course Approval and Records for Merchant Mariner Training Schools."</p> <p>The purpose of the information collection is to determine if merchant mariner training schools meet minimal statutory requirements. The Coast Guard uses this information to approve the curriculum, facility, and faculty for these schools, and to verify student course completion.</p> <p>There is no form associated with this collection.</p> <p>Course Approval and Records for Merchant Mariner Training Schools records contain business contact information, which may include the name and address of the training school owner/operator, if owned/operated by an individual. The records also include the names of course instructors and proctors, and the names of students that complete or disenroll from a course or program.</p>	



Records associated with this collection are maintained in accordance with NARA retention schedule number DAA-GRS-2013-0007-0012 (GRS 4.2, Item 130) and are in a CG restricted file server at the USCG National Maritime Center (NMC).

Course Approval and Records for Merchant Mariner Training Schools is privacy sensitive-coverage is proved by DHS/USCG/PIA-015, Merchant Mariner Licensing and Documentation System (MMLDS).



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Kattina Do
PCTS Workflow Number:	0023745
Date approved by DHS Privacy Office:	January 18, 2023
PTA Expiration Date	January 18, 2026

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 type="checkbox"/> Other. Click here to enter text.
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: DHS/USCG/PIA-015 Merchant Mariner Licensing and Documentation System 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 submitting this renewal PTA to discuss the Course Approval and Records for Merchant Mariner Training Schools. No changes have been made since the last adjudication on January 17, 2020.

The purpose of the information collection is to determine if merchant mariner training schools meet minimal statutory requirements. The Coast Guard uses this information to approve the curriculum, facility and faculty for these schools, and to verify student course completion.

There is no form associated with this collection. The records contain business contact information, which may include the name and address of the training school owner/operator, if owned/operated by an individual. The records also include the names of course instructors and proctors, and the names of students that complete or dis-enroll from a course or program.

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-015 Merchant Mariner Licensing and Documentation System, which discusses how USCG uses this system to: (1) manage the issuance of credentials to Merchant Mariners and process merchant mariner applications; (2) produce merchant mariner credentials; (3) track merchant mariner credentials issued by the Coast Guard; (4) track the status of merchant mariners with respect to service, training, credentials, and qualifications, related to the operation of commercial vessels; (5) qualify merchant mariners for benefits and services administered by other agencies; and (6) perform merchant mariner call-ups related to national security. While this PIA does not explicitly call out the information collected from those at merchant marine training schools (it focuses more on the actual merchant mariner), the PIA provides enough notice about the Merchant Marine process in general. USCG should include information related to this accreditation process next time this PIA is updated.

SORN coverage is also not required because information is not retrieved by personal identifier.