



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:	CGHQ-3923		
Form Title:	State Registration Data		
Component:	U.S. Coast Guard (USCG)	Office:	CG-BSX

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	State Registration Data		
OMB Control Number:	1625-NEW	OMB Expiration Date:	TBD
Collection status:	New Collection	Date of last PTA (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Susan Weber		
Office:	CG-BSX	Title:	Statistician
Phone:	202-372-1103	Email:	Susan.M.Weber@uscg.mil

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Anthony Smith		
Office:	CG-612	Title:	PRA Coordinator
Phone:	202-475-3532	Email:	Anthony.D.Smith@uscg.mil



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

46 USC 12302 describes the requirement to create a standard numbering system. 46 USC 6102 describes the requirement to provide statistics and recommendations based on a marine casualty reporting system.

The Coast Guard’s primary purpose for collecting vessel registration data is to measure casualty rates. Registration data frequently serves as the denominator of fatality rates (usually expressed in x deaths per 100,000 registered vessels). The existence of registration data allows the Coast Guard to normalize data and provide meaningful statistics and recommendations for the National Recreational Boating Safety (RBS) Program.

The authorities for this collection are 46 USC 12302 and 46 USC 6102.

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 type="checkbox"/> U.S. citizens or lawful permanent residents <input type="checkbox"/> Non-U.S. Persons. <input type="checkbox"/> DHS Employees <input type="checkbox"/> DHS Contractors <input type="checkbox"/> Other federal employees or contractors.
c. Who will complete and submit this form? (Check all that apply.)	<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.

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.



	<p>If a business entity, is the only information collected business contact information?</p> <p><input type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p> <p><input type="checkbox"/>Law enforcement.</p> <p><input type="checkbox"/>DHS employee or contractor.</p> <p><input checked="" type="checkbox"/>Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> The name, business email address, and business phone number of the State agency representative are requested in this Collection of Information. The State agency representative is responsible for submitting aggregate vessel statistics for their State.</p>										
<p>d. How do individuals complete the form? <i>Check all that apply.</i></p>	<p>X <input type="checkbox"/>Paper.</p> <p>X <input type="checkbox"/>Electronic. (ex: fillable PDF)</p> <p><input type="checkbox"/>Online web form. (available and submitted via the internet)</p> <p><i>Provide link:</i></p>										
<p>e. What information will DHS collect on the form?</p>											
<p>Name, business phone number and business email address of state agency representative.</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>											
<table border="0"> <tr> <td><input type="checkbox"/> Social Security number</td> <td><input type="checkbox"/> DHS Electronic Data Interchange</td> </tr> <tr> <td><input type="checkbox"/> Alien Number (A-Number)</td> <td>Personal Identifier (EDIPI)</td> </tr> <tr> <td><input type="checkbox"/> Tax Identification Number</td> <td><input type="checkbox"/> Social Media Handle/ID</td> </tr> <tr> <td><input type="checkbox"/> Visa Number</td> <td><input type="checkbox"/> Known Traveler Number</td> </tr> <tr> <td><input type="checkbox"/> Passport Number</td> <td></td> </tr> </table>		<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	
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<input type="checkbox"/> Passport Number											



<input type="checkbox"/> Bank Account, Credit Card, or other financial account number <input type="checkbox"/> Other. <i>Please list:</i>		<input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) <input type="checkbox"/> Driver's License Number <input type="checkbox"/> Biometrics	
g. List the specific authority to collect SSN or these other SPII elements.			
N/A.			
h. How will this information be used? What is the purpose of the collection? Describe why this collection of SPII is the minimum amount of information necessary to accomplish the purpose of the program.			
N/A			
i. 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. There is a Privacy Act Statement on the 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 checked="" type="checkbox"/> Paper. Please describe. Paper copies received are scanned into an Office of Auxiliary and Boating Safety (CG-BSX) folder on the CG server, then discarded. <input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Forms are saved to a CG-BSX folder on the CG server. <input type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.



	Scanned forms are stored on the CG server into an electronic folder.
b. If electronic, how does DHS input the responses into the IT system?	<p><input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. Forms are saved to a CG-BSX folder on the CG server.</p> <p><input type="checkbox"/> Automatically. Please describe. Click here to enter text.</p>
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<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> Information is not retrieved by an individual, however via workbook/worksheet. Each workbook represents a calendar year’s worth of data. Each worksheet represents a particular State’s submission.</p>
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	NARA schedule Standard Subject Identification Code (SSIC) 16750, item 12, change was submitted to NARA and is currently pending.
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	The NARA records retention schedule is currently pending approval with NARA.

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.



f. Is any of this information shared outside of the original program/office? *If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?*

Yes, information is shared with other DHS components or offices. Please describe.

Yes, information is shared *external* to DHS with other federal agencies, state/local partners, international partners, or non-governmental entities. Please describe.

Federal sources and the marine industry representatives are the primary requestors of state registration information. The Coast Guard uses this data to measure fatality rates and the Department of the Treasury uses this information to calculate financial allocations of trust fund money. Marine industry stakeholders (e.g., manufacturing association, boating safety product marketers, etc.) request the information to gauge market dynamics.

The Coast Guard also publishes an annual Recreational Boating Statistics Report which provides information on boating accidents and boat registration data and also provides numerical information to a distribution list of interested individuals; no PII is shared.

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:	Kenlinishia Tyler
Date submitted to component Privacy Office:	October 23, 2018
Date submitted to DHS Privacy Office:	November 8, 2018
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 checked="" type="checkbox"/> Yes. Please include it with this PTA submission. A PAS is on the form. However, information is not retrieved by a personal identifier; USCG Privacy will work w/Program to change PAS to a Privacy Notice. <input type="checkbox"/> No. Please describe why not. Click here to enter text.
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 State Registration Data is a collection of vessel registration data that creates a means to measure casualty rates. Registration data frequently serves as the denominator of fatality rates (usually expressed in x deaths per 100,000 registered vessels).</p> <p>The existence of registration data allows the Coast Guard to normalize data and provide meaningful statistics and recommendations for the National Recreational Boating Safety (RBS) Program. Name, business phone number and business email address are collected for this initiative.</p> <p>DHS/USCG-013 and DHS/USCG/PIA-008 provide coverage for this collection.</p>	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Riley Dean
PCTS Workflow Number:	Click here to enter text.
Date approved by DHS Privacy Office:	November 8, 2018
PTA Expiration Date	November 8, 2021

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 Notice 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.
DHS IC/Forms Review:	Choose an item.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	e(3) statement update is required.



	The Privacy Act Statement on the form should be modified into a Privacy Notice as the information is not covered by a SORN since it is not retrieved by personal identifier.
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: <i>Please describe rationale for privacy compliance determination above.</i>	
<p>USCG is submitting this PTA to discuss CGHQ-3923, State Registration Data, which is associated with a new information collection. The purpose of the form is to collect vessel registration data in order to measure casualty rates, as required by 46 U.S.C. 6102. The form collects only basic business contact information from a state representative on the overall number of vessels registered in the state. This information is then used as the denominator when measuring the number of incidents involving casualties.</p> <p>The DHS Privacy Office finds that this form is privacy-sensitive, requiring PIA coverage.</p> <p>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. SORN coverage is not technically required as the information is collected and therefore not retrieved by a unique identifier. However, DHS/USCG-013 MISLE does provide notice of this type of information collection. Additionally, a Privacy Act Statement is not required. The current Privacy Act Statement on the form should be amended to a Privacy Notice.</p>	