



## 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](mailto: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.

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**Form Number:** CG-3585

**Form Title:** Certificate of Compliance

Component: U.S. Coast Guard (USCG) Office: CG-REG

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#### **IF COVERED BY THE PAPERWORK REDUCTION ACT:**

**Collection Title:** Certificates of Compliance, Boiler/Pressure Vessel Repairs, Cargo Gear Records, Shipping Papers, and NFPA 10 Certificates

OMB Control Number: 1625-0037 OMB Expiration Date: November 30, 2022

Collection status: Extension Date of last PTA (if applicable): July 11, 2019

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#### **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

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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

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## 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, 1625-0037: "Certificates of Compliance, Boiler/Pressure Vessel Repairs, Cargo Gear Records, Shipping Papers, and NFPA 10 Certificates."

The USCG uses the Certificate of Compliance form (CG-3585) to certify that a vessel meets certain domestic and international marine safety and environmental protection requirements. The Coast Guard issues this form to document compliance with the requirements.

CG-3585 contains the name of the vessel, International Maritime Organization (IMO) number, vessel flag, name/address of owner, name/address of operator, vessel specific information, port of issue (i.e., where authorized official endorsed certificate), and the signature of the authorized official issuing or endorsing the Certificate. If deficiencies are found during the course of an examination, then the form also contains the name and signature of the vessel representative receiving a copy of the form.

Records associated with this collection are maintained in accordance with NARA's record retention schedule: N1-026-05-015 and are uploaded into the vessel-specific file in the Marine Information for Safety and Law Enforcement (MISLE) database.

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

46 U.S. Code 3301, 3305, 3306, 3702, 3703, 3711, 3714, 4302 and 4502 are the authorities for this collection.

### **2. Describe the IC/Form**



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www.dhs.gov/privacy

a. Does this form collect any Personally Identifiable Information" (PII <sup>1</sup> )?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b. From which type(s) of individuals does this form collect information? <i>(Check all that apply.)</i>	<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 checked="" type="checkbox"/> DHS Employees/Contractors (list Components) <input type="checkbox"/> Other federal employees or contractors
c. Who will complete and submit this form? <i>(Check all that apply.)</i>	<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 <b>that is NOT the record subject.</b> Please describe. Click here to enter text.
d. How do individuals complete the form? <i>Check all that apply.</i>	<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?	

<sup>1</sup> 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.



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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)	<input type="checkbox"/> 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 financial account number	Entry, Pre-Check, etc.)
<input type="checkbox"/> Other. <i>Please list:</i>	<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. 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 (CG-3585) is to certify that a vessel meets certain domestic and international marine safety and environmental protection 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 (*Does the records subject have notice of the collection or is*

<input checked="" type="checkbox"/> Yes. Please describe how notice is provided. A Privacy Notice will be posted on the form.
<input type="checkbox"/> No.



*form filled out by  
third party)?*

<b>3. How will DHS store the IC/form responses?</b>	
a. How will DHS store the original, completed IC/forms?	<input type="checkbox"/> Paper. Please describe. <a href="#">Click here to enter text.</a> <input type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Forms that the Coast Guard create are maintained in the MISLE database.
b. If electronic, how does DHS input the responses into the IT system?	<input checked="" type="checkbox"/> Manually (data elements manually entered). Please describe. A scanned record is uploaded to the vessel-specific files in MISLE. <input type="checkbox"/> Automatically. Please describe. <a href="#">Click here to enter text.</a>
c. How would a user search the information submitted on the forms, <i>i.e.</i> , how is the information retrieved?	<input type="checkbox"/> By a unique identifier. <sup>2</sup> <i>Please describe.</i> If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. <a href="#">Click here to enter text.</a> <input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> A search is done using vessel-specific information.
d. What is the records retention schedule(s)? <i>Include</i>	A record is retained for the life of the vessel; NARA retention schedule number N1-026-05-015.

<sup>2</sup> 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.



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<i>the records schedule number.</i>	
e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?	As records are maintained in the MISLE database, disposal/deletion is in accordance with the business rules for the database.
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. <a href="#">Click here to enter text.</a>	
<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. <a href="#">Click here to enter text.</a>	
<input checked="" 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:	July 15, 2022
Concurrence from other Components involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	September 16, 2022
Have you approved a Privacy Act Statement for this form? (Only applicable if you have received a waiver from the DHS Chief Privacy Officer to approve component Privacy Act Statements.)	<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.
<b>Component Privacy Office Recommendation:</b> <i>Please include recommendation below, including what existing privacy compliance documentation is available or new privacy compliance documentation is needed.</i>  The U.S. Coast Guard (USCG) is renewing the Information Collection Request (ICR) titled, 1625-0037: "Certificates of Compliance, Boiler/Pressure Vessel Repairs, Cargo Gear Records, Shipping Papers, and NFPA 10 Certificates."  The USCG uses the Certificate of Compliance form (CG-3585) to certify that a vessel meets certain domestic and international marine safety and environmental protection requirements. The Coast Guard issues this form to document compliance with the requirements.  CG-3585 contains the name of the vessel, International Maritime Organization (IMO) number, vessel flag, name/address of owner, name/address of operator, vessel specific information, port of issue (i.e., where authorized official endorsed certificate), and the signature of the authorized official issuing or endorsing the Certificate. If deficiencies are found during the course of an examination, then the form also contains the name and signature of the vessel representative receiving a copy of the form.	



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Records associated with this collection are maintained in accordance with NARA's record retention schedule: N1-026-05-015 and are uploaded into the vessel-specific file in the Marine Information for Safety and Law Enforcement (MISLE) database.

The Certificate of Compliance 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:	<b>Brian Pochtila</b>
PCTS Workflow Number:	<b>0023151</b>
Date approved by DHS Privacy Office:	September 16, 2022
PTA Expiration Date	September 16, 2025
DHS Privacy Office Approver (if applicable):	<b>Schuntel Reddock</b>

## DESIGNATION

Privacy Sensitive IC or Form:	<b>Yes</b> 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. <a href="#">Click here to enter text.</a>
Privacy Act Statement:	Choose an item. Privacy Notice submitted and approved.
System PTA:	Choose an item. <a href="#">Click here to enter text.</a>
PIA:	<b>System covered by existing PIA</b> 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: <a href="#">Click here to enter text.</a>
SORN:	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>



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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 PTA renewal for the Information Collection Request (ICR) titled, 1625-0037: "Certificates of Compliance, Boiler/Pressure Vessel Repairs, Cargo Gear Records, Shipping Papers, and NFPA 10 Certificates." USCG uses the Certificate of Compliance form (CG-3585) to certify that a vessel meets certain domestic and international marine safety and environmental protection requirements. The Coast Guard issues this form to document compliance with the requirements.

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DHS Privacy concurs that the Certificate of Compliance is privacy sensitive requiring PIA coverage. DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE) collects information required to support the Coast Guard's marine safety, security, environmental protection and law enforcement programs.

DHS Privacy finds that no SORN coverage is required since this collection is not retrieved by a personal identifier.