



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
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Form Title:	N/A
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Component:	U.S. Coast Guard (USCG)	Office:	CG-REG
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IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Marine Occupational Health and Safety Standards for Benzene –46 CFR 197 Subpart C
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OMB Control Number:	1625-0063	OMB Expiration Date:	November 30, 2022
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Collection status:	Extension	Date of last PTA (if applicable):	August 23, 2019
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PROJECT OR PROGRAM MANAGER

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

Name:	A.L. Craig
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Office:	CG-6P	Title:	PRA Coordinator
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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, 1625-0063: "Marine Occupational Health and Safety Standards for Benzene –46 CFR 197 Subpart C."

The purpose of this information collection is to protect individuals from exposure to toxic benzene vapor. The Coast Guard uses this information to determine if the proper safety precautions are being taken to protect the employees from hazards associated with the transfer and storage of benzene.

There is no form associated with this collection. The records contain the name, social security number, job classification and medical information of each employee subject to medical surveillance. The records also contain the name and address of the vessel owner/operator, if the vessel is owned or operated by an individual. A full list of requirements is in 46 CFR 197 Subpart C.

Benzene records are not submitted to the Coast Guard; rather they are developed and maintained by the employer. However, during non-standard practices such as marine casualty investigations, the Coast Guard could take possession of benzene records, store them in the Marine Information for Safety and Law Enforcement (MISLE) system and retrieve the information by Coast Guard inspection or casualty case number.

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

The authority for this collection is 46 U.S. Code (U.S.C.) 3703.

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 checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" type="checkbox"/> Non-U.S. Persons <input type="checkbox"/> DHS Employees/Contractors (list Components) <input type="checkbox"/> Other federal employees or contractors
c. Who will complete and submit this form? (Check all that apply.)	<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. Please describe. Click here to enter text.
d. How do individuals complete the form? Check all that apply.	<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) Provide link:
e. What information will DHS collect on the form?	

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.



The records contain the name, social security number, job classification and medical information of each employee subject to medical surveillance. The records also contain the name and address of the vessel owner/operator, if the vessel is owned or operated by an individual.

f. Does this form collect Social Security number (SSN) or other element that is stand-alone Sensitive Personally Identifiable Information (SPII)? Yes.

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| <input checked="" 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 | <input type="checkbox"/> Trusted Traveler Number (Global |
| <input type="checkbox"/> Bank Account, Credit Card, or other | Entry, Pre-Check, etc.) |
| financial account number | <input type="checkbox"/> Driver's License Number |
| <input checked="" type="checkbox"/> Other. <i>Please list:</i> | <input type="checkbox"/> Biometrics |
| Medical information. | |

g. List the **specific authority** to collect SSN or these other SPII elements.

29 U.S.C. §§ 653, 655, and 657 authorizes collection of the social security number and medical information of the employee.

h. Is SSN necessary to carry out the functions of this form and/or fulfill requirements of the information collection?

The information is used by the employer to safeguard the health of their employees.

i. How will this information be used? What is the purpose of the collection?

The purpose of this information collection is to protect individuals from exposure to toxic benzene vapor. The Coast Guard uses this information to determine if the proper safety precautions are being taken to protect the employees from hazards associated with the transfer and storage of benzene.

j. Are individuals provided notice at the time of collection by DHS (*Does the records subject have notice of*

- ☐ Yes. Please describe how notice is provided.
Click here to enter text.
- ☒ No.
Information is retrieved by Coast Guard inspection or casualty case number.



<i>the collection or is form filled out by third party)?</i>	
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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 type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form. Click here to enter text. <input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository. Information that the Coast Guard receives is 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. Information is uploaded to the vessel-specific file in MISLE. <input type="checkbox"/> Automatically. Please describe. Click here to enter text.
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. ² Please describe. If information is retrieved by personal identifier, please submit a Privacy Act Statement with this PTA. Click here to enter text. <input checked="" type="checkbox"/> By a non-personal identifier. Please describe. Benzene records are maintained by the employer (<i>i.e.</i> , vessel). However, during non-standard practices such as marine casualty investigations, the Coast Guard could take possession of benzene records, store them in the MISLE system and retrieve the

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.



	information by Coast Guard inspection or casualty case number.
d. What is the records retention schedule(s)? <i>Include the records schedule number.</i>	A record is retained for the life of the vessel; NARA retention schedule number N1-026-05-015.
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. Click here to enter text.	
<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. Click here to enter text.	
<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:	May 27, 2022
Concurrence from other Components involved (if applicable):	N/A
Date submitted to DHS Privacy Office:	July 7, 2022
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. There is no form associated with this collection. Information is retrieved by Coast Guard inspection or casualty case number.
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, 1625-0063: "Marine Occupational Health and Safety Standards for Benzene –46 CFR 197 Subpart C."</p> <p>The purpose of this information collection is to protect individuals from exposure to toxic benzene vapor. The Coast Guard uses this information to determine if the proper safety precautions are being taken to protect the employees from hazards associated with the transfer and storage of benzene.</p> <p>There is no form associated with this collection.</p> <p>Benzene records are not submitted to the Coast Guard; rather they are developed and maintained by the employer. However, during non-standard practices such as marine casualty investigations, the Coast Guard could take possession of benzene records, store</p>	



them in the Marine Information for Safety and Law Enforcement (MISLE) system and retrieve the information by Coast Guard inspection or casualty case number.

The Marine Occupational Health and Safety Standards for Benzene –46 CFR 197 Subpart C collection is privacy sensitive-coverage is provided by DHS/USCG/PIA-008, Marine Information for Safety and Law Enforcement (MISLE).



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Brian Pochatila
PCTS Workflow Number:	0022803
Date approved by DHS Privacy Office:	July 7, 2022
PTA Expiration Date	July 7, 2025
DHS Privacy Office Approver (if applicable):	Schuntel Reddock

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-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 submitting this PTA renewal for the Marine Occupational Health and Safety Standards for Benzene Information Collection, which is used to protect individuals from exposure to toxic benzene vapor. USCG uses this information to determine if the proper safety precautions are being taken to protect the employees from hazards associated with the transfer and storage of benzene.

There is no form associated with this collection. The records contain basic business contact information, which may include the name and address of the vessel owner/operator, if owned/operated by an individual. Additionally, the records include the name, SSN job classification and medical information of each employee subject to medical surveillance.

Additionally, benzene records are not submitted to the Coast Guard; rather they are developed and maintained by the employer. However, during non-standard practices such as a marine casualty investigation, USCG could take possession of benzene records, store them in the Marine Information for Safety and Law Enforcement (MISLE) system and retrieve the information by Coast Guard inspection or casualty case number. Marine casualty investigations are covered by OMB Control Number 1625-0001.

DHS Privacy concurs that this information collection to be privacy sensitive requiring PIA coverage. PIA coverage is provided by DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE), which is a steady-state system designed to capture information required to support the Coast Guard's marine safety, security, environmental protection and law enforcement programs. Supporting these programs requires the collection of personally identifiable information about individuals associated with vessels, as well as investigatory information.

SORN coverage is not required at this time, as information is not recovered via unique identifier. However, SORN DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE) does provide coverage for this type of information collection.