



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:	1652-0051		
Form Title:	Rail Transportation Security		
Component:	Transportation Security Administration (TSA)	Office:	Office of Security Policy and Industry Engagement (OSPIE)

IF COVERED BY THE PAPERWORK REDUCTION ACT:

Collection Title:	Rail Transportation Security		
OMB Control Number:	1652-0051	OMB Expiration Date:	October 31, 2018
Collection status:	Extension	Date of last PTA (if applicable):	2014

PROJECT OR PROGRAM MANAGER

Name:	Nina Case		
Office:	OSPIE	Title:	Surface Division
Phone:	571-227-2438	Email:	nina.case@tsa.dhs.gov

COMPONENT INFORMATION COLLECTION/FORMS CONTACT

Name:	Glenn Stoll		
Office:	Information Management Program Section (IMPS)	Title:	IMPS Director, Forms Management Officer
Phone:	571-227-5175	Email:	Glenn.stoll@tsa.dhs.gov



SPECIFIC IC/Forms PTA QUESTIONS

1. Purpose of the Information Collection or Form

a. Describe the purpose of the information collection or form. *Please provide a general description of the project and its purpose, including how it supports the DHS mission, in a way a non-technical person could understand (you may use information from the Supporting Statement).*

If this is an updated PTA, please specifically describe what changes or upgrades are triggering the update to this PTA.

TSA is seeking to renew the collection of information for the Rail Transportation Security regulation, 49 CFR 1520 and 1580. This information collection enhances the security of the Nation’s freight and passenger rail systems by requiring certain rail carriers, shippers and receivers in a High Threat Urban Area (HTUA) to: designate a Rail Security Coordinator (RSC) and Alternate RSC; report significant security concerns; provide the location and shipping information of rail cars under their physical custody and control; and document the secure exchange of custody of rail cars carrying Rail Security-Sensitive Materials (RSSM). These requirements provide TSA with a point of contact for covered entities; support timely communication of vital security information between TSA and stakeholders; analysis of information to develop threat assessments and allocation of security resources; and ensure certain rail cars are not left unattended in a non-secure area.

b. List the DHS (or component) authorities to collect, store, and use this information. *If this information will be stored and used by a specific DHS component, list the component-specific authorities.*

49 CFR 1520 and 1580 codified the scope of TSA’s existing inspection program and requires regulated parties to allow TSA and Department of Homeland Security (DHS) officials to enter, inspect, and test property, facilities, conveyances, and records relevant to rail security. This rule also requires that regulated parties designate rail security coordinators and report significant security concerns. This rule further requires that freight rail carriers and certain facilities handling specified hazardous materials be able to report location and shipping information to TSA upon request and implement chain of custody requirements to ensure a positive and secure exchange of specified hazardous materials.



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 <ul style="list-style-type: none"> <input checked="" type="checkbox"/> U.S. citizens or lawful permanent residents <input checked="" 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 checked="" type="checkbox"/> Business entity. If a business entity, is the only information collected business contact information? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Law enforcement. <input type="checkbox"/> DHS employee or contractor. <input type="checkbox"/> Other individual/entity/organization that is NOT the record subject. <i>Please describe.</i> Click here to enter text.
d. How do individuals complete the form? Check all that apply.	<input 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>

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.



e. What information will DHS collect on the form? *List all PII data elements on the form. If the form will collect information from more than one type of individual, please break down list of data elements collected by type of individual.*

Railroad Security Coordinator business contact info: Name, title, company/railroad name, mailing address, phone number, and email address. Also captured are names of individuals attending/witnessing the transfer of custody of rail cars.

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

- | | |
|---|--|
| <input type="checkbox"/> Social Security number | <input type="checkbox"/> DHS Electronic Data Interchange Personal Identifier (EDIPI) |
| <input type="checkbox"/> Alien Number (A-Number) | <input type="checkbox"/> Social Media Handle/ID |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Known Traveler Number |
| <input type="checkbox"/> Visa Number | <input type="checkbox"/> Trusted Traveler Number (Global Entry, Pre-Check, etc.) |
| <input type="checkbox"/> Passport Number | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Bank Account, Credit Card, or other financial account number | <input type="checkbox"/> Biometrics |
| <input type="checkbox"/> Other. <i>Please list:</i>
N/A | |

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.

TSA will use this information to ensure regulated parties are in compliance with security requirements.

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

- Yes. Please describe how notice is provided.
Requirements to provide information are outlined in the rule. Information is provided by the business entity.
- No.



<i>form filled out by third party)?</i>	
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3. How will DHS store the IC/form responses?

<p>a. How will DHS store the original, completed IC/forms?</p>	<p><input type="checkbox"/> Paper. Please describe. Click here to enter text.</p> <p><input checked="" type="checkbox"/> Electronic. Please describe the IT system that will store the data from the form.</p> <p><input checked="" type="checkbox"/> Scanned forms (completed forms are scanned into an electronic repository). Please describe the electronic repository.</p> <p>TSA’s Performance and Results Information System (PARIS) is used to track and provide information to aviation and multimodal surface transportation security programs with incident data related to investigations, inspections and enforcement activities initiated by TSA against individuals, transportation sector facilities, and other entities involved in incidents that may or may not have led to an investigations or legal action. Information is retained for security management purposes related to development of lessons learned, best practices, corrective actions and the prosecution of violators of transportation security regulations.</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>The original information is maintained by the regulated party. During an inspection, the inspector takes a photo or scans in the record containing the name or unique identifying employee number and saves the image to PARIS.</p> <p><input type="checkbox"/> Automatically. Please describe.</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><input checked="" type="checkbox"/> By a non-personal identifier. <i>Please describe.</i> Tracking number, date, or rail region or area</p>
<p>d. What is the records retention schedule(s)? <i>Include the records schedule number.</i></p>	<p>Records input to PARIS are maintained for seven years after cut-off in accordance with NARA authority N1-560-12-002 Item 3.</p>
<p>e. How do you ensure that records are disposed of or deleted in accordance with the retention schedule?</p>	<p>Rail Transportation Security records in PARIS are reviewed periodically and any older than seven years since cut-off are deleted.</p>
<p>f. Is any of this information shared outside of the original program/office? <i>If yes, describe where (other offices or DHS components or external entities) and why. What are the authorities of the receiving party?</i></p>	
<p><input checked="" type="checkbox"/> Yes, information is shared with other DHS components or offices. Please describe. Significant security concerns are reported to Transportation Security Operations Center.</p> <p><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. Significant security concerns may be shared with other law enforcement or intelligence agencies.</p> <p><input type="checkbox"/> No. Information on this form is not shared outside of the collecting office.</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.



Homeland
Security

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



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:	Jennifer L. Schmidt
Date submitted to component Privacy Office:	December 22, 2017
Date submitted to DHS Privacy Office:	January 2, 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 type="checkbox"/> Yes. Please include it with this PTA submission. <input checked="" type="checkbox"/> No. Please describe why not. Records are not retrieved by a unique 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>	
TSA Privacy recommends approval of this Information Collection PTA. This collection is privacy sensitive because it maintains PII on members of the public; thus a PIA is required. PIA coverage is provided by DHS/TSA/PIA-038 Performance and Results Information System (PARIS). No SORN coverage is required because records are not retrieved by a unique personal identifier.	



PRIVACY THRESHOLD ADJUDICATION

(TO BE COMPLETED BY THE DHS PRIVACY OFFICE)

DHS Privacy Office Reviewer:	Sean McGuinness
PCTS Workflow Number:	1156714
Date approved by DHS Privacy Office:	January 25, 2021
PTA Expiration Date	January 25, 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 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.
DHS IC/Forms Review:	DHS PRIV has not received this ICR/Form.
Date IC/Form Approved by PRIV:	Click here to enter a date.
IC/Form PCTS Number:	Click here to enter text.
Privacy Act Statement:	Choose an item. Privacy Act Statement is not required as information is not retrieved by personal identifier
PTA:	No system PTA required. Click here to enter text.
PIA:	System covered by existing PIA



	<p>If covered by existing PIA, please list: DHS/TSA/PIA-038 Performance and Results Information System (PARIS)</p> <p>If a PIA update is required, please list: Click here to enter text.</p>
SORN:	<p>If covered by existing SORN, please list: Click here to enter text.</p> <p>If a SORN update is required, please list: Click here to enter text.</p>
<p>DHS Privacy Office Comments: <i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>DHS Privacy Office finds that the Rail Transportation Security form is privacy sensitive as it collects PII from members of the public (to include U.S. citizens or lawful permanent residents and Non-U.S. Persons).</p> <p>The Rail Transportation Security form collects PII from certain rail carriers, shippers and receivers in High Threat Urban Areas (HTUA) to: designate a Rail Security Coordinator (RSC) and Alternate RSC; report significant security concerns; provide the location and shipping information of rail cars under their physical custody and control; and document the secure exchange of custody of rail cars carrying Rail Security-Sensitive Materials (RSSM).</p> <p>PRIV agrees with TSA Privacy that PIA coverage is provided under DHS/TSA/PIA-038 Performance and Results Information System (PARIS). PARIS maintains personally identifiable information (PII) about individuals, including witnesses, involved in security incidents or regulatory enforcement activities.</p> <p>SORN coverage is not required as information is not retrieved via personal identifier.</p> <p>A Privacy Act Statement is not required as information is not retrieved via personal identifier. Information is retrieved by</p> <p>PRIV recommends that a link is added to the program webpage that points to guidance on information that should be entered into an e-mail inquiry.</p>	