



Privacy Impact Assessment

for the

COVID-19 Data Analytics

DHS Reference No. DHS/USCG/PIA-031

July 20, 2021



**Homeland
Security**



Abstract

The purpose of the U.S. Coast Guard (USCG) COVID-19 Data Analytics program (“COVID-19 Operational Software Suite”) is to minimize USCG operational impacts (e.g., workforce readiness, COVID-19 Vaccine Support) during the COVID-19 pandemic. The pandemic impact to the USCG is widespread and touches all aspects of USCG’s responsibilities of maritime safety, security, and stewardship in U.S. ports and inland waterways. USCG is publishing this Privacy Impact Assessment (PIA) to assess the privacy risks and mitigations of collecting Personally Identifiable Information (PII) and Sensitive PII (SPII) associated with implementing the COVID-19 Operational Software Suite.

Overview

USCG is responsible for ensuring the Nation’s maritime safety, security, and stewardship. USCG has 11 statutory missions codified in the Homeland Security Act of 2002.¹ These missions are: Ports, Waterways, and Coastal Security; Drug Interdiction; Migrant Interdiction; Defense Readiness; Law Enforcement; Marine Safety; Search and Rescue (SAR); Aids to Navigation; Living Marine Resources; Marine Environmental Protection; and Ice Operations. The COVID-19 Operational Software Suite provides USCG leadership and employees with mission critical capabilities that enable rapid analysis and visualization of USCG data in near real-time, assisting decision-making processes throughout the COVID-19 pandemic.

About the COVID-19 Operational Software Suite

USCG implemented the COVID-19 Operational Software Suite, using a contracted third-party vendor platform, to conduct data analytics in order to address and minimize COVID-19 impacts to USCG missions. The COVID-19 Operational Software Suite is not part of any underlying database or source system, nor does it collect or change any data in the source systems or permanently retain data. The tool is designed for unclassified information up to For Official Use Only (FOUO).²

The COVID-19 Operational Software Suite governance structure includes full oversight by the USCG Data Readiness Task Force (DRTF) and the Office of Privacy Management (CG-6P). When a program wants to incorporate a new use case or tool into the platform, the program must submit its proposal to the DRTF. The DRTF makes a determination if the use case is applicable to the platform. The program and DRTF work with CG-6P to conduct a Privacy Threshold Analysis (PTA)³ to assess the privacy risks and determine whether additional

¹ 6 U.S.C. § 468(a).

² The third-party vendor platform is hosted and owned by Palantir. Palantir is contracted to the USCG to conduct data analytics for the USCG.

³ CG-6P requires all programs that deploy the COVID-19 Operational Software Suite to conduct a PTA describing



compliance documentation is necessary, including updates to this PIA, source system PIAs, and source system System of Records Notices (SORN).

Compliance Framework

USCG is conducting this PIA to describe the approved use cases for the COVID-19 Operational Software Suite. The COVID-19 Operational Software Suite enables users to examine trends and patterns in data that are critical to USCG operations (e.g., projected inventory shortages, quarantine impacts to unit readiness). The automated nature of enhanced analytics increases the efficiency and effectiveness of USCG managers at all levels, and allows USCG leadership the ability to meet mission critical needs.

At a high level, USCG anticipates using the USCG COVID-19 Operational Software Suite to assess existing data for the following purposes:

1. *COVID-19 Vaccine Support:* USCG Executives, Commanders, and Health Care Providers are moving toward increasingly data-driven decision-making. These personnel have a need to assess and visualize data related to their specific areas of responsibility to make fact-based decisions. The logistics supporting the COVID-19 Vaccine initiative is complex, involving multiple vaccine doses, cold chain management, and delivery to remote locations. The COVID-19 Operational Software Suite is designed to aid USCG leadership to manage the safe and efficient vaccination of USCG personnel. See Appendix A for more information on COVID-19 Vaccine Support.
2. *Workforce Readiness:* The COVID-19 Operational Software Suite provides data visualization to support USCG workforce readiness. The COVID-19 pandemic has significantly affected the USCG workforce. The COVID-19 Operational Software Suite provides USCG senior leadership with data to discover emerging risks and new patterns, allowing USCG to assume a more proactive risk-assessment posture of its workforce readiness. See Appendix B for more information on Workforce Readiness.
3. *Strategic Resource and Asset Allocation:* USCG is responsible for securing and safeguarding vast amounts of information, locations, personnel, and resources. The pandemic has caused substantial disruptions to the global supply chain, which has made asset allocation (e.g., Personal Protective Equipment (PPE) inventory) of extreme importance. The COVID-19 Operational Software Suite provides a high-level view of whether assets are being over- or underused, allowing USCG to more effectively deploy its limited resources. See Appendix C for more information on Strategic Resource and Asset Allocation.

the use case, type of technology, data used, analysis to be performed, and expected outcome. The DHS Privacy Office reviews and adjudicates all PTAs prior to implementation.



4. *Operational Readiness*: USCG needs to understand its operational domains to conduct its 11 statutory missions. The COVID-19 Operational Software Suite allows the USCG to discover emerging risks and shifting patterns and to assume a more proactive operational and risk-assessment posture during the COVID-19 pandemic. The COVID-19 Operational Software Suite assists USCG users in the field to perform operations including preventing violations of law or regulations at and between ports of entry. See Appendix D for more information on Operational Readiness.

Appendix E details the specific publicly available and commercial data (open-source data) approved for use by the COVID-19 Operational Software Suite.

The COVID-19 Operational Software Suite does not grant users new access to USCG data or allow a user to view underlying system data they have not already received permission to view or have a need to know. At no point can access to the COVID-19 Operational Software Suite provide users the ability to make changes to a source database. Users cannot change or manipulate the underlying data using the COVID-19 Operational Software Suite.

USCG will update the Appendices to this PIA prior to adding new initiatives, new use cases, additional open-source data, or additional USCG data to the COVID-19 Operational Software Suite.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

USCG uses the COVID-19 Operational Software Suite to support its 11 statutory missions during the COVID-19 pandemic. The COVID-19 Operational Software Suite governance structure ensures that USCG is using the information consistent with its authorities, and with the original purpose of the collection. USCG is authorized to collect pertinent information in support of these missions pursuant to the following:

- 5 United States Code (U.S.C.) § 301. The head of an Executive department or military department may prescribe regulations for the government of his department, the conduct of its employees, the distribution and performance of its business, and the custody, use, and preservation of its records, papers, and property.
- 10 U.S.C. §§ 1043, 1147. 10 U.S.C. Subtitle A, Part II, Chapter 55, Medical and Dental Care, as applicable. The Coast Guard, as a military service and a branch of the armed forces of the United States, is provided with medical and dental care for members, for certain former members, and for their dependents.
- 14 U.S.C. § 93. This establishes the general powers of the Coast Guard Commandant.



- 14 U.S.C. § 504(a)(17). The Commandant of the Coast Guard may provide medical and dental care for personnel.
- 14 U.S.C. § 632. States the functions and powers vested in the Commandant of the Coast Guard.
- 14 U.S.C. § 936. This section identifies the confidentiality of medical quality assurance records for Coast Guard personnel.
- 14 U.S.C. § 3705. The Coast Guard Reserve is a component of the Coast Guard. This section identifies the benefits afforded to Coast Guard Reserve personnel.
- 37 U.S.C. § 406. Establishes the pay and allowances of the Uniformed Services.
- 40 U.S.C. § 1315. Describes the law enforcement authority of the Secretary of Homeland Security regarding the protection of public property.
- 42 U.S.C. § 213. Establishes the military benefits of commissioned officers.
- 42 U.S.C. § 253. Establishes that certain Coast Guard persons are entitled to medical services.
- 32 Code of Federal Regulations (CFR) Part 199. The Civilian Health and Medical Program of the Uniformed Services (CHAMPUS). As a uniformed service, CHAMPUS applies to the Coast Guard.
- 42 CFR Parts 31.2 - 31.10. Specifies that certain Coast Guard uniformed personnel, their dependents, and Auxiliarists are entitled to medical, surgical, and dental treatment and hospitalization.
- Workforce safety federal requirements, including the Occupational Safety and Health Act of 1970, Executive Order 12196, 5 U.S.C. § 7902; 29 U.S.C. Chapter 15 (e.g., 29 U.S.C. § 668); 29 CFR Part 1904, 29 CFR Parts 1910.1020, and 29 CFR Parts 1960.66.
- Coronavirus Aid, Relief, and Economic Security “CARES” Act, Public Law 116-136, Div. B, which was passed by the U.S. Congress in response to the economic fallout of the COVID-19 pandemic.
- Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. §§. 2000ff to ff-11, which prohibits employment discrimination based on genetic information.
- COMMANDANT INSTRUCTION 3501.80, 31 MAR 2020, which covers the USCG policy for defining organizational readiness and the elements that comprise readiness.



Establishes the framework to develop a readiness measurement platform, process, and reporting system to support operational decision making throughout the Service.⁴

1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The USCG COVID-19 Operational Software Suite receives information from several systems. The source system SORNs below apply. As further data is entered into the USCG COVID-19 Operational Software Suite, any additional applicable SORNs will be listed in the appropriate appendix.

- DHA-207/EDHA-07 Military Health Information System, which covers information that provides federal agencies the ability to support continuity of care for patrons, ensures more efficient adjudication of claims, enables quality assurance and healthcare operations, and supports a myriad of healthcare policy, public health, military mission, data analysis, and clinical research activities;⁵
- DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), which covers information collected in order to provide authorized individuals with access to DHS information technology resources;⁶
- DHS/ALL-007 Accounts Payable, which covers information from individuals in connection with reimbursable services provided to DHS to ensure the Department properly pays these individuals;⁷
- DHS/ALL-008 Accounts Receivable, which covers the ability to collect and maintain records on accounts receivable, which enables DHS to have an accurate accounting of money it is owed;⁸

⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, COMMANDANT INSTRUCTION 3501.80, COAST GUARD DEFINITION OF READINESS, *available at* https://media.defense.gov/2020/Mar/31/2002272813/-1/-1/0/CI_3501_80.PDF.

⁵ See DHA-207/EDHA-07 Military Health Information System, 85 FR 36190 (June 15, 2020), *available at* <https://www.health.mil/Military-Health-Topics/Privacy-and-Civil-Liberties/Privacy-Act-at-DHA/List-of-all-DHA-SORNs>.

⁶ See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

⁷ See DHS/ALL-007 Accounts Payable, 83 FR 65705 (December 21, 2018), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

⁸ See DHS/ALL-008 Accounts Receivable, 83 FR 65176 (December 19, 2018), *available at* <https://www.dhs.gov/system-records-notices-sorns>.



- DHS/ALL-010 Asset Management Records, which covers information necessary to track all DHS-owned or controlled property that has been issued to current and former DHS employees and contractors;⁹
- DHS/ALL-047 Records Related to DHS Personnel, Long-Term Trainees, Contractors, and Visitors During a Declared Public Health Emergency, which covers DHS's collection, use, and maintenance of records on individuals associated with DHS and its facilities during a declared public health emergency;¹⁰
- DHS/USCG-011 Military Personnel Health Records, which covers military personnel health records. This information assists USCG in meeting its obligation to manage military personnel health records;¹¹
- DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE), which covers information and records of marine safety, security, environmental protection, and law enforcement, performance history of vessels, facilities, people and organizations engaged in marine transportation;¹²
- DHS/USCG-014 Military Pay and Personnel, which covers USCG's administration of the USCG active duty, reserve, and retired active duty and retired reserve military pay and personnel system and supports personnel accountability for USCG affiliated personnel during a natural or man-made disaster or when directed by the USCG Commandant;¹³
- DHS/USCG-027 Recruiting Files, which covers recruiting files and documents recruiting efforts for the USCG and USCG Reserves;¹⁴
- DHS/USCG-031 USCG Law Enforcement (ULE) System of Records, which covers USCG's collection and maintenance of records related to maritime law enforcement, security, marine safety, and environmental protection activities;¹⁵

⁹ See DHS/ALL-010 Asset Management Records, 80 FR 58280 (September 28, 2015), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹⁰ See DHS/ALL-047 Records Related to DHS Personnel, Long-Term Trainees, Contractors, and Visitors During a Declared Public Health Emergency, 85 FR 45914 (July 30, 2020), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹¹ See DHS/USCG-011 Military Personnel Health Records, 73 FR 77773 (December 19, 2008), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹² See DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE), 74 FR 30305 (June 25, 2009), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹³ See DHS/USCG-014 Military Pay and Personnel, 76 FR 66933 (October 28, 2011), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹⁴ See DHS/USCG-027 Recruiting Files, 76 FR 49494 (August 10, 2011), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

¹⁵ See DHS/USCG-031 USCG Law Enforcement (ULE) System of Records, 81 FR 88697 (December 8, 2016), *available at* <https://www.dhs.gov/system-records-notices-sorns>.



- DHS/USCG-032 Asset Management Information System (ALMIS), which covers the collection and maintenance of records on the maintenance, mission scheduling, and logistics for USCG aviation and surface assets (e.g., boats);¹⁶ and
- DoD 0004 Defense Repository for Common Enterprise Data (DRCED), which covers multiple information systems that provide DoD-wide and component-level enterprise solutions for integrating and analyzing targeted data from existing DoD systems to develop timely, actionable, and insightful conclusions in support of national strategies.¹⁷

USCG is also drafting a specific USCG Quarantinable Communicable Disease SORN that will provide additional notice of the information collected related to individuals that have a possible quarantinable communicable disease who are in close contact or associated with USCG personnel.

1.3 Has a system security plan been completed for the information system(s) supporting the project?

Yes, USCG completed a system security plan. The COVID-19 Operational Software Suite received an Authority to Operate with Conditions (ATO-C) on March 12, 2021, and it is effective for nine (9) months.

1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Retention schedules for data within COVID-19 Operational Software Suite will be determined by the source systems from which they originate. All data ingests are also tagged with the source system retention schedule. Data in the COVID-19 Operational Software Suite will be refreshed from the source systems at a regular rate, and therefore will adhere to the source system schedules. As source system information refreshes, it will delete any data within COVID-19 Operational Software Suite designated for destruction.

The COVID-19 Operational Software Suite ties any visualizations (e.g., maps, graphs, charts of data points) or analytical products it creates to the underlying records that were analyzed. The appendices of this PIA contain citations to all published privacy documentation of ingested datasets, which contain the relevant retention schedules for ingested data.

¹⁶ See DHS/USCG-023 Asset Management Information System (ALMIS) System of Records, 83 FR 19087 (May 1, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

¹⁷ See DoD 0004 Defense Repository for Common Enterprise Data (DRCED), 86 FR 526 (January 6, 2021), available at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>.



1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The COVID-19 Operational Software Suite does not collect information directly from individuals. All information accessed and analyzed by the COVID-19 Operational Software Suite is provided by government agencies and commercial providers. Some source systems may be subject to the PRA and will state the OMB control number in their respective PIAs. The name of the PIA for each source system can be found within the appendices of this PIA.

Section 2.0 Characterization of the Information

2.1 Identify the information the project collects, uses, disseminates, or maintains.

The COVID-19 Operational Software Suite operates as a platform for a variety of analytical tools that operate across disparate datasets. It employs user access restrictions at the data element level and robust user auditing controls to compartmentalize data based on the user's need to know. The information contained within the COVID-19 Operational Software Suite is sourced from systems as described in this PIA's appendices. The information contained in the COVID-19 Operational Software Suite will continuously change as analytical tools are developed.

Depending on the initiative (identified as an Appendix to this PIA), the COVID-19 Operational Software Suite maintains information on specific categories of individuals including, but not limited to, USCG personnel (e.g., Active Duty, Reserve, Coast Guard Civilian) and members of the public (e.g., USCG Military Dependents).

The COVID-19 Operational Software Suite maintains categories of information dependent on the specific initiative. Those data elements are listed in the initiative-specific Appendices of this PIA, but may include name, date of birth, mailing address, e-mail address, Zip Code, Employee ID number (EMPLID), Unit designation, or other unique operational identifiers (e.g., Marine Information for Safety and Law Enforcement (MISLE) Case ID).

For example, for the COVID-19 Vaccine Support Initiative, the COVID-19 Operational Software Suite maintains specific information on USCG Personnel including:

- Name;
- Electronic Data Interchange Personal Identifier (EDIPI);
- Employee Identification Number (EMPLID);



- Date of birth;
- Work email;
- Sex/Gender;
- Marital status;
- Race;
- Ethnicity;
- Case ID (Unique in the DoD Defense Repository Form Common Enterprise Data (DRCED known as Advanced Analytics) (ADVANA)) platform);
- Vaccine Event ID;
- Vaccine Lot Number;
- Vaccine CVX (Vaccine Type); and
- Unit Identification Code (UIC).

The COVID-19 Vaccine Support Initiative also maintains specific information on members of the public (i.e., USCG Dependents) including:

- Name;
- Date of birth;
- DoD ID;
- Sex/Gender;
- Recipient Status (e.g., USCG Dependent);
- Vaccine Event ID;
- Vaccine Lot Number;
- Vaccine CVX (Vaccine Type); and
- UIC.

The COVID-19 Operational Suite does not maintain Social Security numbers (SSN) or biometric identifiers. USCG only uploads the CG-6P-approved information needed for each use case into the COVID-19 Operational Software Suite, thus limiting the amount of PII, SPII, and Protected Health Information (PHI) available.

All open-source data is identified in Appendix E. In addition, each initiative's appendix to this PIA identifies any open-source data that the third-party vendor platform is using to support



the specific USCG initiative.

2.2 What are the sources of the information and how is the information collected for the project?

The COVID-19 Operational Software Suite maintains information from multiple source systems. The information is not collected directly from an individual; rather the information is pulled from a source system, manually or, in the future, through system-to-system interconnectivity. The COVID-19 Operational Software Suite does not have the ability to change, modify, or otherwise alter data in the underlying source system.

For example, for the COVID-19 Vaccine Support Initiative, the COVID-19 Operational Software Suite may pull information from specific source systems including the Coast Guard Personnel Accountability and Assessment System (CGPAAS);¹⁸ Direct Access (DA);¹⁹ Coast Guard Business Intelligence (CGBI);²⁰ and the Medical Readiness Reporting System (MRRS).²¹ The COVID-19 Operational Software Suite pulls information from these systems to manage the safe and efficient vaccination of USCG personnel and dependents.

Each initiative's appendix to this PIA identifies a comprehensive list of source systems used to support the specific USCG initiative.

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

Yes. Commercially available data and open source (public) data may be ingested or accessed by the COVID-19 Operational Software Suite.²² The COVID-19 Operational Software Suite integrates this open-source data with the USCG data to provide the USCG with a comprehensive understanding of the COVID-19 pandemic impact on USCG missions and readiness. USCG does not use open-source data to identify individuals or verify information already provided by or about an individual.

Each initiative's appendix to this PIA identifies any open-source data that the third-party vendor platform is using to support the USCG initiative. A comprehensive open-source data list is

¹⁸ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

¹⁹ *Id.*

²⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE COAST GUARD BUSINESS INTELLIGENCE (CGBI), DHS/USCG/PIA-018 (2012), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

²¹ USCG is developing a USCG Electronic Health Records Acquisition (eHRA) PIA, which will be available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

²² USCG does not use social media information in the COVID-19 Operational Software Suite.



identified in Appendix E.

2.4 Discuss how accuracy of the data is ensured.

All datasets analyzed by the COVID-19 Operational Software Suite are provided by other government and commercial databases. The COVID-19 Operational Software Suite relies on the accuracy and integrity of source system data or established USCG data aggregators, such as USCG's Enterprise Data Warehouse (EDW),²³ which obtains its data from the source systems. The COVID-19 Operational Software Suite does not alter or transform data in the source systems, and automated and manual quality checks are integrated into the tool to validate source data as it is ingested. The third-party vendor platform stores all data in a secure cloud environment.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that data originally collected for other purposes is used inappropriately for analytical purposes.

Mitigation: This risk is mitigated. USCG will develop a PTA for any third-party vendor platform, COVID-19 Operational Software Suite tool, or COVID-19 Operational Software Suite use case that will perform COVID-19 data analytics as part of this PIA. The PTA will include a discussion of the datasets involved and analysis to ensure adherence to the Purpose Specification principle and the source system PIA(s) and SORN(s).

If the analysis concludes that the purposes articulated at the time of collection are aligned, then USCG will update the appendices to this PIA to describe the new use case and any new data. If the analysis concludes that the purposes articulated at the time of collection are not aligned, the tool may not be eligible to be included as part of this PIA, and would require its own PIA to assess the risks associated with the proposed use of USCG data.

Further, the COVID-19 Operational Software Suite does not provide a user with any access to USCG data that the user does not already have access to in the performance of their duties.

Privacy Risk: There is a risk that information will be included into the COVID-19 Operational Software Suite that is not necessary or relevant to accomplish the USCG purpose to conduct data analytics to ensure mission and personnel readiness during the COVID-19 pandemic.

Mitigation: This risk is mitigated. USCG only includes information in the COVID-19 Operational Software Suite that has been approved through multiple governance layers. Any potential data is evaluated using the COVID-19 Operational Software Suite governance structure.

²³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE COAST GUARD BUSINESS INTELLIGENCE (CGBI), DHS/USCG/PIA-018 (2012), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.



Any program that wants to incorporate a new use case or tool into the platform must submit its proposal to the DRTF. The DRTF determines whether the information is necessary and relevant to accomplish the USCG purpose to conduct data analytics to ensure mission and personal readiness during the COVID-19 pandemic. Once approved by the DRTF, the program and the DRTF work with CG-6P to conduct a PTA to ensure that only the information necessary and relevant to accomplish the USCG purpose of conducting data analytics is approved for use by the COVID-19 Operational Software Suite.

Privacy Risk: There is a privacy risk that users will unnecessarily store local copies of the extracted data prior to upload into the tool.

Mitigation: This risk is partially mitigated. As part of the privacy compliance process, CG-6P staff counsel and advise programmatic offices on the method and duration that data extracts from the source system may be stored. To access the data, the users must have a need to know to fulfill their official duties, and already have access to the data in the source system(s). Additionally, users are required to complete basic information management and privacy training prior to being granted access to the platform.

Privacy Risk: There is a risk that corrections made to PII in the underlining source systems will not be reflected in the COVID-19 Operational Software Suite, thus leading to inaccurate or out-of-date information being stored, shared, or used.

Mitigation: This risk is mitigated. USCG instituted multiple procedures to ensure the COVID-19 Operational Software Suite is using accurate data. USCG refreshes highly visible data (e.g., COVID-19 Vaccine Support) multiple times per day. By refreshing data multiple times per day, USCG mitigates the risk of stale information and ensures USCG leadership and operators make decisions informed by accurate data. All datasets are time stamped based on the last update. This allows COVID-19 Operational Software Suite users to identify the last update.

The COVID-19 Operational Software Suite incorporates an automatic data cleaning process that eliminates and corrects known data inaccuracies, so each user only has access to the most recent version; this cleaning process does not affect the data in the source system(s). Old versions of the data are kept as a record, which ensures USCG can audit records. This process ensures that users across the USCG are accessing the most accurate and timely data.

Further, the COVID-19 Operational Software Suite facilitates analysis of existing USCG data for COVID-19 purposes. Any decision affecting an individual is based on data from the source system, to which existing access, redress, and correction procedures still apply. Any compartmentalized or sensitive data is appropriately marked to ensure data integrity.

Section 3.0 Uses of the Information

3.1 Describe how and why the project uses the information.



USCG deployed the COVID-19 Operational Software Suite to perform data analysis of internal datasets and other sources available to USCG to support its 11 statutory missions during the COVID-19 pandemic. These advanced analytic tools assist USCG efforts by helping USCG personnel use the data they already have in source systems more efficiently and effectively. The COVID-19 Operational Software Suite enables USCG users to look at trends and patterns that are critical to USCG operations. The automated nature of enhanced analytics increases the efficiency and effectiveness of USCG managers, at all levels, to easily identify mission critical information. The analytic tools do not collect information directly from the public; however, the underlying source systems often contain information collected directly from an individual.

As an example of the outputs the COVID-19 Operational Software Suite may produce, USCG has a need to understand how its workforce is being vaccinated. The COVID-19 Operational Software Suite can use source system data to produce a report that provides visual analysis of where USCG personnel are being vaccinated, what vaccine they are being administered, when individuals are due for their second dose, or what types of individuals they are (e.g., newly onboarded, actively deployed on a Cutter). This will assist USCG decision makers know where additional vaccine doses need to be shipped and administered. Individual level PII is not needed or displayed.

USCG minimizes the PII or SPII that the COVID-19 Operational Software Suite maintains by only uploading the CG-6P approved information needed for each use case. The platform does not maintain certain SPII, such as SSN, biometric identifiers, Passport numbers, or bank and citizenship information. The COVID-19 Software Suite does maintain certain categories of unique identifiers (e.g., MISLE Case number) because these identifiers are critical to integrating multiple sets of records into a single “data asset” to ensure data integrity. Using a source system unique identifier instead of SPII (e.g., SSN, Tax Identification Number) minimizes risk to a specific individual in the COVID-19 Operational Software Suite.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how DHS plans to use such results.

The COVID-19 Operational Software Suite is able to conduct queries of datasets accessed from multiple databases to discover predictive patterns and connections between entities and events. It will assist users in recognizing relationships between disparate or previously un-synthesizable data.

The COVID-19 Operational Software Suite is predominately a data-visualization tool, but more complex analytics may be used. However, it does not conduct complex analytics to target or identify individuals. No new results or records will be placed in any individual’s records.



USCG may conduct complex analytics resulting in matching (e.g., integrating multiple datasets to clean the data), aggregated statistics reporting (e.g., COVID-19 Vaccine Support aggregated vaccine rates), or pattern analysis. Pattern analysis may, for example, include identifying USCG helicopter assets to determine which helicopters are best equipped to deploy to a disaster response zone, or USCG identifying qualifications, billet, and competencies to ensure workforce readiness across the USCG.

3.3 Are there other components with assigned roles and responsibilities within the system?

No other DHS components have assigned roles and responsibilities within the system; however, information resulting from the use of the platform may be shared with those components as appropriate.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk a user will have access to information that they do not have a documented need to know.

Mitigation: This risk is mitigated. Information and tool access within the COVID-19 Operational Software Suite is compartmentalized to match the user's defined need to know. Users are required to document the access level prior to gaining entry to any tools within the platform. The USCG compartmentalizes information based on two levels: (1) Role-based Access Control (e.g., use case), and (2) Information Control or Data Sensitivity (e.g., FOUO). A user's access permissions are granular down to the individual data field. For instance, a Surface Forces Logistics Center (SFLC) user will not have access to the Aviation Logistics Center (ALC) data. Information controls are tied to the level of data sensitivity (e.g., FOUO). For instance, only certain users in the COVID-19 Vaccine Tracking use case are authorized to access COVID-19 Vaccine Tracking information.

Finally, the COVID-19 Operational Software Suite has alert mechanisms in place to identify unauthorized user access. In the event a user gains unauthorized access without a documented need to know, USCG investigates the user's activities by analyzing audit logs of that individual's activities and takes any appropriate action if there is an inappropriate use or access.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The COVID-19 Operational Software Suite does not directly collect information from



individuals, and therefore is unable to provide direct notification that information is being used. However, general notice of the existence, contents, and uses of this system, and the systems from which it routinely derives its data, is provided by the publication of this PIA and the associated PIAs and SORNs of the source systems. When information is obtained from Federal Government forms, Privacy Act Statements and privacy notices state why the information is being collected and how that information may be shared.

4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

As the COVID-19 Operational Software Suite does not directly collect information from individuals, there is no opportunity for individuals to consent, decline, or opt out of providing information to the system. The agency, program, or source systems (e.g., Direct Access, CGPAAS) that collected the information from individuals are best positioned to provide individuals with the opportunity to consent, decline to provide information, or opt out. These programs, however, may not be able to provide an individual with the opportunity to consent or decline to the use of their information depending on the nature of those systems (e.g., law enforcement use).

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that USCG does not provide sufficient notice of collection of this information.

Mitigation: This risk is partially mitigated. Notice is provided through the publication of this PIA and the source system PIAs and/or SORNs. If there is a form associated with the collection of information, then notice of information collection is provided with the form. However, because the COVID-19 Operational Software Suite does not directly collect information from individuals, this risk cannot be fully mitigated.

Privacy Risk: There is a privacy risk that individuals do not have the opportunity to consent to their information being used by the COVID-19 Operational Software Suite.

Mitigation: This risk is partially mitigated. The COVID-19 Operational Software Suite does not collect information directly from individuals. However, USCG mitigates this risk by ensuring that the COVID-19 Operational Software Suite cannot change or modify the underlying source system to which USCG continues to provide access, correction, and redress. The source system, to the extent permitted by law, offers individuals the opportunity to provide their information directly to USCG and provides notice, as appropriate, at the time of collection.

Section 5.0 Data Retention by the Project

5.1 Explain how long and for what reason the information is retained.



Datasets accessed or ingested by the COVID-19 Operational Software Suite will be governed by source system SORNs and their own NARA-approved retention periods. The retention of data within COVID-19 Operational Software Suite is determined by the source system connection. As an analytical platform, COVID-19 Operational Software Suite will not hold data longer than the source system. As source system information refreshes, it will delete any data within COVID-19 Operational Software Suite designated for destruction. All data ingests are also tagged with the source system retention schedule; thus, if a source system is decommissioned, records will be retained for the relevant retention schedule in the COVID-19 Operational Software Suite. Ad-hoc uploads and data from source systems with no retention schedule will be tagged with its associated case file. The retention period for each dataset is outlined in the published privacy documentation cited in the appendices of this PIA.

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a privacy risk that the COVID-19 Operational Software Suite will retain data for longer than is necessary or for a longer period than allowable under the source system's retention schedule.

Mitigation: This risk is mitigated. The COVID-19 Operational Software Suite datasets are refreshed and updated regularly from source systems. Data will also be tagged with the source system retention schedule when it is ingested. Moreover, USCG will conduct a PTA for each COVID-19 Operational Software Suite tool or use case that will perform COVID-19 data analytics. The PTA will identify the appropriate retention schedule, which will not be longer than the source system's retention schedule (or the source system with the shortest retention period in the event that multiple source systems are used to create a visualization).

Handling and retention requirements will remain consistent for data as it is accessed by different tools on the platform. Products of COVID-19 Operational Software Suite analytical tools will be connected to the underlying records in the COVID-19 Operational Software Suite. As the underlying records are deleted in accordance with source system retention periods, the analytical products will be updated to ensure that records do not remain in a COVID-19 Operational Software Suite analytical work product past the source system retention schedule.

USCG COVID-19 Operational Software Suite operators and CG-6P will collaboratively verify that the COVID-19 Operational Software Suite tool does not retain data longer than authorized, and that the tool deletes the data in accordance with the approved records retention schedule, as well as at the completion of this program.

Section 6.0 Information Sharing

6.1 Is information shared outside of DHS as part of the normal agency operations? If so, identify the organization(s) and how the



information is accessed and how it is to be used.

No, information is not shared outside of DHS as part of the normal agency operations. However, any sharing external to DHS is discussed in the appendices of this PIA.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

Any external sharing from the source systems will be done so in accordance with applicable law, including the published routine uses in the associated SORNs, as listed in the appendices of this PIA.

6.3 Does the project place limitations on re-dissemination?

Any specific limitations on re-dissemination is described in the relevant source system PIAs and in the appendices of this PIA, when external sharing occurs.

6.4 Describe how the project maintains a record of any disclosures outside of the Department.

Because the COVID-19 Operational Software Suite is not a system of record, each source system is responsible for maintaining a record of any disclosures as outlined in its applicable SORN and PIA. All ad-hoc requests for information are forwarded to the source system's owner for response. All disclosures of records are made in accordance with the appropriate PIA and SORN, and in accordance with any applicable MOUs, ISAs, or MOAs.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk of unauthorized re-dissemination or improper sharing of information from the COVID-19 Operational Software Suite program.

Mitigation: This risk is mitigated. The COVID-19 Operational Software Suite does not authorize re-dissemination of information. The source system authorizes re-dissemination of information. All disclosures of records are made in accordance with the appropriate source system's PIA and SORN. USCG tracks audit logs of user activity, including data exports and re-dissemination.

Further, the COVID-19 Operational Software Suite, with limited exceptions, generates an output that is not privacy sensitive—such as a graph or chart of activity in a certain location. To the extent an output generated by the COVID-19 Operational Software Suite includes PII, USCG will not disclose information to third parties that USCG is not legally allowed to disclose. Adherence to this requirement is determined during the PTA process.



Section 7.0 Redress

7.1 What are the procedures that allow individuals to access their information?

An individual may seek access to their records by filing a Privacy Act or Freedom of Information Act (FOIA) request. Only U.S. citizens, lawful permanent residents, and covered citizens of a designated foreign countries or regional economic organization under the Judicial Redress Act (JRA) are afforded provisions under the Privacy Act. Individuals not covered by the Privacy Act or JRA may still obtain access to records consistent with FOIA unless disclosure is prohibited by law or if the agency reasonably foresees that disclosure would harm an interest protected by an exemption. If an individual would like to file a Privacy Act or FOIA request to view their record, they may submit requests electronically at <https://www.dhs.gov/dhs-foia-privacy-act-request-submission-form>. Individuals may also submit requests to the USCG FOIA Officer by mail, facsimile, or email:

Commandant (CG-6P)
Attn: FOIA/PA Officer
U.S. Coast Guard
2703 Martin Luther King, Jr. Ave. SE STOP 7710
Washington, D.C. 20593-7710
Fax: (202) 372-8413
eFOIA@uscg.mil

To conform to the Privacy Act regulations set forth in 6 CFR Part 5, the individual must first verify their identity, including their full name, current address, and date and place of birth. The individual must sign the request. The individual's signature must either be notarized or submitted under 28 U.S.C. § 1746, a law that permits statements to be made under penalty of perjury as a substitute for notarization. In addition, the individual should:

- Explain why he or she believes the USCG would have the information being requested;
- Specify when the individual believes the records would have been created; and
- If the request is seeking records pertaining to another living individual, the request must include an authorization from the individual whose record is being requested, authorizing the release to the requester.

Without the above information, the USCG may not be able to conduct an effective search, and the individual's request may be denied due to lack of specificity or lack of compliance with applicable regulations. All or some of the requested information may be exempt from access pursuant to the Privacy Act in order to prevent harm to law enforcement investigations or interests. Providing an individual access to these records could inform the target of an actual or potential criminal, civil,



or regulatory investigation or reveal investigative interest on the part of DHS or another agency. However, USCG evaluates requests for access and redress on a case-by-case basis.

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

The correction procedure is the same as the procedure identified in Section 7.1 that allows individuals to access their information. U.S. citizens, lawful permanent residents, and covered persons from a covered country under the JRA are afforded amendment provisions, when applicable, through a Privacy Act request. While FOIA does not provide individuals with amendment provisions, USCG evaluates requests for redress on a case-by-case basis.

Depending on the source system, additional procedures that allow the subject individual to correct inaccurate or erroneous information may be provided, as described in applicable PIAs and SORNs.

7.3 How does the project notify individuals about the procedures for correcting their information?

This PIA, as well as the source systems PIAs, provide notice of the procedures. USCG will review any information request on a case-by-case basis. Depending on the source system, notice may have been provided by applicable PIAs and SORNs. If the initial information collection occurred via a form, a Privacy Act Statement or privacy notice may have also provided notice.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not be able to correct or access their information.

Mitigation: This risk is mitigated. Individuals may formally request to correct or access their information by making a Privacy Act or FOIA request, as identified in Sections 7.1 and 7.2. Depending on the source system, redress procedures may have been provided through Privacy Act Statements or applicable PIAs and SORNs.

Data within the COVID-19 Operational Software Suite may also be exempted from certain provisions of the Privacy Act regarding access and redress based on its source system SORN. Nonetheless, USCG will examine each separate request on a case-by-case basis, and may waive applicable exemptions in appropriate circumstances, or when it would not appear to interfere with or adversely affect the law enforcement or national security purposes of the systems from which the information is recompiled or in which it is contained.

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in



accordance with stated practices in this PIA?

USCG has an auditing process to identify which users access the program and what the user can access. USCG has internal policies and procedures for administrators and users of the COVID-19 Operational Software Suite. Certain users may have “read-only” access, while others may be permitted to conduct more in-depth analytics on the data. A limited group of USCG personnel has administrative privileges to the entire platform and data. USCG approves users in a role-based manner to ensure that the information is used in accordance with this PIA.

USCG has established a governance structure that involves several layers of review before any new data can be used in the COVID-19 Operational Software Suite. When a program wants to incorporate a new use case or tool into the platform, the program must submit their proposal to the DRTF. The DRTF makes a determination if the use case is applicable to the platform. The program and DRTF work with CG-6P to conduct a PTA to assess the privacy risks and determine whether additional compliance documentation is necessary.

CG-6P will conduct a USCG Privacy Evaluation (CGPE) within one year of publication of this PIA. CG-6P will share the results of the CGPE with the DHS Privacy Office.

8.2 Describe what privacy training is provided to users either generally or specifically relevant to the project.

The USCG provides annual required training for USCG personnel that consists of USCG Federal Cyber Awareness Training and DHS: Protected Personal Information Training. USCG trains users that USCG will take appropriate administrative or Uniform Code of Military Justice (UCMJ) action against individuals found responsible for unauthorized disclosure of information in violation of the Privacy Act or Health Insurance Portability and Accountability Act (HIPAA) provisions. To receive access, the user must complete the specific annual training requirements. Additionally, user access to the COVID-19 Operational Software Suite requires the individual to complete HIPAA training. Finally, USCG tracks all privacy and security awareness training to demonstrate compliance with training requirements.

8.3 What procedures are in place to determine which users may access the information and how does the project determine who has access?

There are a number of procedures, policies, and technologies in place to limit user access to information contained within the COVID-19 Operational Software Suite.



Only certain USCG personnel who possess a need to know the information in order to perform their official duties will have access to the information. Information within the COVID-19 Operational Software Suite is compartmentalized based on the user's need to know. The COVID-19 Operational Software Suite "tool" access is limited in accordance with the user's need to know. Other agencies do not have access to the platform. If users outside of the USCG want access, then the non-USCG user may be granted access only through a formal access request that the USCG will have to approve.

The COVID-19 Operational Software Suite program manager has administrative access to approve new users, conduct audits, and maintain access protocols. The program manager may designate specific USCG entities (e.g., COVID-19 Crisis Action Team (C-CAT)) with administrative privileges. The program manager will provide these designated entities with guidance for user access based on need to know. These specific USCG entities will be trained on how to manage user permissions prior to designation of such a role.

The COVID-19 Operational Software Suite program manager and CG-6P will conduct auditing and tracking of all user accounts. To account for the USCG geographically mobile workforce, USCG will implement a procedure to ensure user accounts are disabled after a certain period of inactivity. This ensures no user retains access for longer than required (e.g., when a user transfers out of the unit to another command). The COVID-19 Operational Software Suite program manager, CG-6P, and USCG Legal will review any security and auditing measures implemented by the COVID-19 Operational Software Suite.

The COVID-19 Operational Software Suite has either Single-Sign On (Common Access Card login) or multifactor authentication upon login to minimize the risk of an information access breach.

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within DHS and outside?

This COVID-19 Operational Software Suite program reviews and approves any information sharing by organizations inside and outside of DHS. The program manager, CG-6P, and USCG Legal will review all sharing agreements and MOUs/MOAs, any new information, and any new access to the system by any organization inside and outside of DHS.

Contact Official

Data Readiness Task Force
United States Coast Guard
HQS-SMB-CG-67-DRTF@uscg.mil



Responsible Official

Kathleen L. Claffie
Privacy and FOIA Officer
United States Coast Guard
Kathleen.L.Claffie@uscg.mil

Approval Signature

Original, copy signed and on file with the DHS Privacy Office.

Lynn Parker Dupree
Chief Privacy Officer
U.S. Department of Homeland Security
(202) 343-1717



APPENDIX A: COVID-19 Vaccine Support Initiative

Last Update: 20 July 2021

Logistics supporting the nation-wide COVID-19 vaccination campaign are complex, involving cold chain management and multiple doses. The USCG COVID-19 vaccination campaign is especially complex, involving Cutters that get underway and deploy for months at a time, USCG personnel who work temporarily at other units, and duty crews that must be staffed 365/24/7. The COVID-19 Operational Software Suite directly supports USCG decision-makers and health care providers to rapidly vaccinate the USCG workforce. USCG must develop a USCG readiness common operating picture (COP), including COVID-19 vaccine logistics management and distribution and COVID-19 positivity rates, and conduct data analytics to inform operational decisions required in the COVID-19 environment.

Use Cases:

Quarantine Tracking

As the COVID-19 pandemic continues, USCG must identify what happens to USCG personnel who enter into “quarantine” status. USCG uses the COVID-19 Operational Software Suite to identify trends of USCG COVID-19 positive individuals and consider potential future impacts to the USCG workforce. USCG must discern personnel and geographical trends that may affect mission capabilities on the unit, sector, and installation levels. The COVID-19 Operational Software Suite allows USCG leadership to understand the progression and return to work status of the USCG work force. By conducting quarantine tracking data analytics, USCG minimizes the potential spread of COVID-19 to its workforce.

COVID-19 Vaccine Tracking

USCG is undergoing a service-wide COVID-19 Vaccination Campaign. USCG, through the DoD, established a MOA with the Centers for Disease Control and Prevention (CDC) for the COVID-19 Vaccine Support Initiative. The COVID-19 Operational Software Suite contains four data analytic portals for COVID-19 vaccination and tracking. The portals are: (1) USCG-Hierarchy “Briefing” COP for USCG Leadership, (2) USCG Clinic COP for USCG Health Care Providers, (3) Vaccine Dose Manager, and (4) Daily Reporting Survey.

1. *USCG-Hierarchy “Briefing” COP for USCG Leadership*: This is a high-level storyboard for USCG senior leadership and C-CAT leadership. The Briefing COP is organized in alignment with the USCG’s traditional military hierarchy. The Briefing COP has the ability to select and deselect a series of filters including military status, vaccine type, expected second dose due-date, vaccine tier, and vaccination status. Unless the user has a demonstrated need to know, there is no access to PII in this tool.



2. *USCG-Clinic COP for Health Care Providers*: This tool is similar to the Briefing COP; however, the USCG-Clinic COP is modeled on the administrative hierarchy of the USCG Health Care Clinic. The USCG-Clinic COP enables USCG health care staff to maintain visibility on the populations under their responsibility.
3. *Vaccine Dose Manager*: This portal has a Second Dose Tracker, a Roster Generator, and a Report Lost Dose Tracker. The Second Dose Tracker ensures USCG tracks vaccines that require a second dose. The Roster Generator provides clinical employees with the ability to export lists of personnel that are the focus of vaccination outreach efforts based on filtered criteria. USCG uses the Report Lost Dose Tracker to report spoiled and lost doses directly to the USCG COVID-19 Vaccine Incident Command (CVIC).
4. *Daily Reporting Survey*: The CVIC is responsible for generating detailed daily reports on USCG Vaccination progress. The Daily Reporting Survey is a way for the CVIC to augment information collection about current vaccine inventory levels and utilization rates at each USCG Clinic.

Categories of Individuals

The COVID-19 Vaccine Support Initiative maintains information on certain individuals. The individuals are:

- USCG Personnel (i.e., Active Duty, Reserve, Civilian Employees, Contractors); and
- Members of the Public (i.e., USCG Dependents).

Source Systems

The COVID-19 Vaccine Support Initiative uses the following source systems:

- Coast Guard Business Intelligence (CGBI);²⁴
- Coast Guard Personnel Accountability and Assessment System (CGPAAS);²⁵
- Direct Access (DA);²⁶
- Direct Access Personnel Allowance List (PAL);²⁷

²⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE COAST GUARD BUSINESS INTELLIGENCE (CGBI), DHS/USCG/PIA-018 (2012), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

²⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

²⁶ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

²⁷ *Id.*



- DoD Defense Repository Form Common Enterprise Data (DRCED known as Advanced Analytics) (ADVANA));²⁸
- Joint Unified Military Payroll System (JUMPS);²⁹ and
- Medical Readiness Reporting System (MRRS).³⁰

Notable Data Fields

These are the data elements for USCG Personnel that support the COVID-19 Vaccine Support Initiative.

- Name;
- Electronic Data Interchange Personal Identifier (EDIPI);
- Employee Identification Number (EMPLID);
- Date of birth;
- Work email;
- Sex;
- Gender;
- Marital status;
- Race;
- Ethnicity;
- Case ID (Unique in the ADVANA platform);
- Vaccine Event ID;
- Vaccine Lot Number;
- Vaccine CVX (Vaccine Type); and
- Unit Identification Code (UIC).³¹

²⁸ See DoD 0004 Defense Repository for Common Enterprise Data (DRCED), 86 FR 526 (January 6, 2021), available at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDIS-Article-List/>.

²⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

³⁰ USCG is developing a USCG Electronic Health Records Acquisition (eHRA) PIA, which will be available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

³¹ While not unique identifiers, when certain categories are aggregated with other PII the result could be considered



The data elements below for Members of the Public (i.e., USCG Dependents) support the COVID-19 Vaccine Support Initiative.

- Name;
- Date of Birth;
- DoD ID;
- Sex/Gender;
- Recipient Status (i.e., USCG Dependent);
- Vaccine Event ID;
- Vaccine Lot Number;
- Vaccine CVX (Vaccine Type); and
- UIC.

Open-Source Data

The following open-source sources are used to support the COVID-19 Vaccine Support Initiative:

- COVID-19 Cases/Death by County from USAFacts;³²
- Population Demographics from 2018 U.S. Census Bureau;³³
- CG District/Sector Shapes from Homeland Infrastructure Foundation-Level Data (HIFLD) Subcommittee;³⁴
- Weather data from the National Oceanic and Atmospheric Administration (NOAA);³⁵

an identifier. The following categories are: Personnel status (e.g., Unaffected, Quarantined), Work status (e.g., Working On-Site, Working Off-Site), Current location (e.g., city, state, postal code, country), Note entry (e.g., at home providing childcare, teleworking from home), Highest education completed, Employee record status (e.g., Active, Suspended, Awaiting age 60), Military status (e.g., Active duty, Selected Reserve, Individual Ready Reserve), Officer source, Officer category, Commission date, Officer year group, Promotion status, Security clearance level, Reserve training pay status, Date started current enlistment, Current enlistment term in years, Date entered current active duty, Position number (unique number sequence to identify a specific job), and Contract number (recruitment contract the individual signed.)

³² US COVID-19 CASES AND DEATHS BY STATE, available at <https://usafacts.org/visualizations/coronavirus-covid-19-spread-map/>.

³³ EXPLORE CENSUS DATA, available at <https://data.census.gov/cedsci/>.

³⁴ HIFLD OPEN DATA, available at <https://hifld-geoplatform.opendata.arcgis.com/>.

³⁵ NOAA DATA ACCESS, available at <https://www.ncdc.noaa.gov/data-access>.



- State Stay-at-Home Policies from WikiData;³⁶
- World Health Organization (WHO) (e.g., WHO Novel Coronavirus SITREP);³⁷
- Department of Defense (DoD) (e.g., DoD Press Release);³⁸
- Department of Homeland Security (DHS) (e.g., DHS Weekly Update);³⁹ and
- Other federal agencies (e.g., White House Press Briefings, CDC Maritime Transportation Support (MTS) Recovery Support Daily Brief).⁴⁰

Special Requirements for the Vaccination of USCG Dependents

The Defense Health Agency (DHA) and CDC require the USCG track the vaccination status of USCG Dependents. The COVID-19 Operational Software Suite functions as the tool that facilitates this tracking requirement. Only USCG Dependents ages 16 and older who are voluntarily vaccinated will be tracked. USCG does share PII about these dependents with DHA to meet USCG reporting requirements. The PII is limited to name, DoD ID, and vaccine dose information.

The DHA-207 COVID-19 Vaccine Screening and Immunization Form serves as the official record. This paper record is retained by USCG Medical Clinics in the Dependent's Sponsor's medical file until the USCG Military Electronic Health Record System (MHS-GENESIS) is fully operational. MHS-GENESIS will become the system of record once it is operational; forms will be scanned into the Dependent's Sponsor's medical file at that time.

SORNs and PIAs

Associated SORNs

- DHS/ALL-047 Records Related to DHS Personnel, Long-Term Trainees, Contractors, and Visitors During a Declared Public Health Emergency;⁴¹

³⁶ STAY-AT-HOME ORDER ISSUES IN THE UNITED STATES IN RESPONSE TO THE 2020 CORONAVIRUS PANDEMIC, available at <https://www.wikidata.org/wiki/Q88509703>.

³⁷ WORLD HEALTH ORGANIZATION (WHO) CORONAVIRUS DISEASE (COVID-19) WEEKLY EPIDEMIOLOGICAL UPDATE AND WEEKLY OPERATIONAL UPDATE, available at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/situation-reports>.

³⁸ U.S. DEPARTMENT OF DEFENSE (DoD) OFFICIAL DEFENSE DEPARTMENT STATEMENTS AND ANNOUNCEMENTS, available at <https://www.defense.gov/Newsroom/releases/>.

³⁹ U.S. DEPARTMENT OF HOMELAND SECURITY (DHS) NEWS AND UPDATES, available at <https://www.dhs.gov/news-releases>.

⁴⁰ THE WHITE HOUSE PRESS BRIEFINGS, available at <https://www.whitehouse.gov/briefing-room/press-briefings/>.

⁴¹ See DHS/ALL-047 Records Related to DHS Personnel, Long-Term Trainees, Contractors, and Visitors During a Declared Public Health Emergency, 85 FR 45914 (July 30, 2020), available at <https://www.dhs.gov/system-records-notices-sorns>.



- DHS/USCG-011 Military Personnel Health Records;⁴²
- DHS/USCG-014 Military Pay and Personnel;⁴³ and
- Forthcoming USCG Quarantinable Communicable Disease SORN.

PIAs

- DHS/USCG/PIA-018 Coast Guard Business Intelligence (CGBI);⁴⁴
- DHS/USCG/PIA-024 Direct Access;⁴⁵
- Forthcoming USCG Electronic Health Records Acquisition (eHRA) PIA; and
- Forthcoming USCG Quarantinable Communicable Disease PIA.

⁴² See DHS/USCG-011 Military Personnel Health Records, 73 FR 77773 (December 19, 2008), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁴³ See DHS/USCG-014 Military Pay and Personnel, 76 FR 66933 (October 28, 2011), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁴⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE COAST GUARD BUSINESS INTELLIGENCE (CGBI), DHS/USCG/PIA-018 (2012), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁴⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.



APPENDIX B: Workforce Readiness Initiative *Last Update: 20 July 2021*

The Coast Guard's workforce is its greatest asset. The USCG must have a healthy and safe workforce in order to fulfill its statutory missions. The COVID-19 pandemic has affected the USCG workforce. For instance, prior to missions, USCG personnel on Cutters must undergo mandatory "Restriction of Movement" (ROM) periods, meaning personnel cannot leave their residences prior to deployment. Once underway, Cutter personnel have further restrictions such as frequent cancellation of port calls, which restricts Cutter personnel to their ship for months at a time. While these restrictions are necessary to ensure the unit remains operational, it has large effects on Cutter personnel's mental and physical health.

The pandemic has affected recruiting, training, and retention efforts throughout the Service. Data-driven decision-making is a critical component to ensuring the USCG workforce remains healthy and ready to conduct its missions. The COVID-19 Operational Software Suite has the capability to inform policy-makers and senior leadership on how to recruit, train, retain, and understand a resilient workforce.

Use Cases:

The following use cases fall under the Workforce Readiness Initiative:

Personal Protective Equipment Management:

Personal Protective Equipment (PPE) was a critical resource at the beginning of the COVID-19 pandemic and remains a resource that USCG needs to track. The COVID-19 Operational Software Suite tracks PPE Inventory Levels across the USCG and estimates optimal levels based on mission requirements.

USCG Personnel Accountability:

USCG's Coast Guard Personnel Accountability and Assessment System (CGPAAS) is a critical link in understanding the status (e.g., Quarantine, No Status) of the USCG workforce service-wide. The COVID-19 Operational Software Suite assists USCG leadership to understand a variety of metrics including total current COVID-19 cases, personnel temporarily assigned to other units, and overall workforce readiness.

USCG Recruiting and Retention:

The COVID-19 pandemic has significantly reduced USCG's ability to recruit new military personnel. Coast Guard Recruiting Command (CGRC) leaders and analysts need to analyze the effects of COVID-19 on Coast Guard recruiting and predict future impacts. CGRC leadership must understand what recruiting areas are most productive to maximize limited resources, and analyze



historic office performance to identify trends and consider new recruiting office locations to maximize recruiter efficiency in light of COVID-19. CGRC must balance the need to conduct efficient recruiting (e.g., surge recruiters, new recruiting office locations) with limited resources.

Because of the COVID-19 pandemic, CGRC will be unable to meet Accession Plan targets, which will create personnel shortages in the field and reduce USCG readiness. USCG uses the COVID-19 Operational Software Suite to create a talent management tool to better understand service, unit, and individual readiness. The Assistant Commandant for Human Resources (CG-1) and CGRC leadership need to understand the anticipated attrition and retention rates to predict how many people will exit the Coast Guard over the next several years, and look for trends to retain targeted specialties. CG-1 will evaluate historic and potential future workforce shaping interventions to maximize the use of limited retention resources going forward. CG-1 leadership must understand in which enlisted ratings USCG will experience shortfalls; which units and positions are most likely to be gapped; what is the efficacy (return on investment) of retention bonuses based on occupational specialties and economic factors; and which monetary interventions would yield the most effective results to mitigate personnel gaps.

Aviation Survival Technician (AST) Readiness:

As the COVID-19 pandemic continues in the midst of a second hurricane season, USCG must monitor the overall health readiness of its workforce. Search and rescue (SAR) is one of the USCG's statutory missions. However, COVID-19 has affected USCG mission readiness, and the addition of hurricane season means many USCG members are not SAR ready. By using the COVID-19 Operational Software Suite, the USCG will be able to show up-to-date and trending capabilities of the USCG AST workforce, and obtain real time "mission" readiness levels of personnel at the unit level.

Enlisted Training and Accessions Plans (ETAP) Assessment:

As the COVID-19 pandemic continues, Coast Guard Office of Budget and Programs (CG-821) must determine how well USCG has met its policy driven goals (enlisted training) based on limited resources. CG-821 must determine what impacts the COVID-19 pandemic has had on the current ETAP, including recruiting, basic training, and A-school targets (i.e., quotas) for the USCG active duty and reserve workforces. USCG leadership must determine how the COVID-19 pandemic has affected future training to ensure that the allocation of accession and training resources will meet the Active Duty and Reserve workforces' needs.

Categories of Individuals

The Workforce Readiness Initiative maintains information on certain individuals:

- USCG Personnel (e.g., Active Duty, Reserve, Recruit that signed a contract with USCG); and



- Members of the Public (i.e., Recruit that did not sign a contract with USCG).

Source Systems

The Workforce Readiness Initiative uses the following source systems:

- Coast Guard Personnel Accountability and Assessment System (CGPAAS);
- Direct Access (DA);
- Direct Access Personnel Allowance List (PAL);
- Joint Unified Military Payroll System (JUMPS); and
- USCG binnacle list.⁴⁶

Notable Data Fields

The following data elements on USCG Uniformed Member (i.e., Recruit that signed the contract with USCG) support the Workforce Readiness Initiative.

- Name;
- Age;
- Date of birth;
- EDIPI;
- EMPLID;
- Sex;
- Race description;
- Applicant ID (record identifier, unique to the recruiting system);
- Citizenship Status;
- Ethnicity;
- Gender;
- Race/Ethnic Code;
- Current Location (e.g., city, state, postal code, country);

⁴⁶ The USCG AST Rating Force Master Chief manages the USCG binnacle list. This USCG data contains PII, but does not contain SPII or PHI. The PII on USCG Aviation Survival Technician Personnel includes: Name, Unit (e.g., Kodiak), Days Fit to Stand Duty (#), Days Med-Down (#), Total Days (#), Total Grounded (%), Unit Total (#), Month, and Year.



- Commission Date;
- Enlistment Contract Number;
- Enlistment Contract Type (e.g., re-enlist, initial enlistment);
- AFQT (Overall composite score for the Armed Services Vocational Aptitude Battery score);
- Military Entrance and Processing Command (MEPCOM) Education Code; and
- Security Clearance Level.

The following data elements on USCG Uniformed Member (i.e., Recruiter) support the Workforce Readiness Initiative.

- Recruiter Name;
- Recruiter ID (EMPLID);
- Employee status (Active or separated);
- Active or Reserve Component;
- Current mailing address and Zip code;
- Member age; and
- Time in service.

The following data elements on Members of the Public (i.e., Recruit that did not sign the contract with USCG) support the Workforce Readiness Initiative.

- Person ID (Unique recruiting record identifier);
- Citizenship status;
- Race/Ethnic code;
- Gender;
- Marital Status;
- Race description;
- Hispanic Ethnicity (y/n);
- Date record created;
- Postal code; and
- Source of record (e.g., manual recruiter entry).



Open-Source Data

The following open-source sources are used:

- Regional Unemployment from the U.S. Bureau of Labor Statistics;⁴⁷
- COVID-19 Transmission from Wikipedia;⁴⁸
- Higher Education Costs from U.S. Department of Education's College Scorecard;⁴⁹
- Obesity Rates from the U.S. Centers for Disease Control and Prevention;⁵⁰ and
- Google search trends from Google Trends web service.⁵¹

Special Requirements

There are no special requirements for the Workforce Readiness Initiative.

SORNs and PIAs

Associated SORNs

- DHS/USCG-014 Military Pay and Personnel;⁵² and
- DHS/USCG-027 Recruiting Files.⁵³

PIAs

- DHS/USCG/PIA-012 Recruit Analysis and Tracking System;⁵⁴ and
- DHS/USCG/PIA-024 Direct Access.⁵⁵

⁴⁷ U.S. BUREAU OF LABOR STATISTICS, DATABASES, TABLES & CALCULATORS, *available at* <https://www.bls.gov/data/>.

⁴⁸ STATISTICS OF THE COVID-19 PANDEMIC IN THE UNITED STATES, *available at* https://en.wikipedia.org/wiki/Statistics_of_the_COVID-19_pandemic_in_the_United_States.

⁴⁹ U.S. DEPARTMENT OF EDUCATION (DOE) COLLEGE SCORECARD, *available at* <https://collegescorecard.ed.gov/>.

⁵⁰ CENTERS FOR DISEASE CONTROL AND PREVENTION DATA & STATISTICS, *available at* <https://www.cdc.gov/obesity/data/index.html>.

⁵¹ GOOGLE TRENDS, *available at* <https://trends.google.com/trends/?geo=US>.

⁵² See DHS/USCG-014 Military Pay and Personnel, 76 FR 66933 (October 28, 2011), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

⁵³ See DHS/USCG-027 Recruiting Files, 76 FR 49494 (August 10, 2011), *available at* <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁴ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE RECRUIT ANALYSIS AND TRACKING SYSTEM, DHS/USCG/PIA-012 (2012), *available at* <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁵⁵ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), *available at* <https://www.dhs.gov/privacy-documents-us-coast-guard>.



APPENDIX C: Strategic Resource and Asset Allocation Initiative

Last Update: 20 July 2021

USCG assets require regular maintenance to ensure strategic resource and asset allocation for all USCG missions. Maintenance cycles are impacted by the COVID-19 pandemic in a variety of ways, including shipping delays, part and material shortages, and COVID-19 outbreaks at maintenance facilities. Additionally, the USCG operates in remote parts of the world where the consequences of an equipment casualty can be severe. The pandemic's significant impact to the global supply chain means even a temporary disruption, like a shipping delay, can significantly affect USCG's ability to conduct its statutory missions.

The COVID-19 Operational Software Suite provides USCG with a high-level view of its assets, which allows for the effective deployment of USCG's limited resource.

Use Cases:

The following use cases fall under the Asset Readiness Initiative:

Surface Forces Logistics Center:

USCG's Surface Forces Logistics Center (SFLC) supports every surface asset of the USCG with depot maintenance and inventory support services. The disruption caused by COVID-19 had immediate effects on depot maintenance availabilities, personnel cost increases (e.g., PPE needs, Shelter in Place Orders), supply chain disruptions, and absence of the specialized workforce. These impacts resulted in work delays and put the operational readiness of the surface fleet at risk. SFLC must calculate and conduct inventory demand and budget funding.

However, just as critical as managing these current COVID-19 complications is the need to conduct precise and careful planning for the next six to 12 months. For the USCG to maintain mission readiness, the depot maintenance schedule for the end of Fiscal Year (FY) 21 and FY 22 requires advanced financial, operational, and logistical coordination that is unavailable in the current state.

The COVID-19 Operational Software Suite combines maintenance, inventory, and financial data that enables the USCG to perform sensitive and relevant cost projections, readily identify and discern trends related to the COVID-19 environment, and responsively adjust to operational challenges and schedule changes.

Aviation Logistics Center:

USCG's Aviation Logistics Center (ALC) supports every aviation asset of the USCG with depot maintenance and inventory support services. Like SFLC, ALC has been similarly impacted by the COVID-19 pandemic. The disruption caused by COVID-19 had immediate effects on depot



maintenance availabilities, supply chain disruptions, and the absence of the specialized workforce. These impacts resulted in work delays and put the operational readiness of the aviation fleet at risk.

However, just as critical as managing these current COVID-19 complications is the need to conduct precise and careful planning for the next six to twelve months. For the USCG to maintain mission readiness throughout the remaining pandemic and in future emergencies (e.g., hurricane response support), ensuring the ALC's Inventory Control Point is able to continue to support mission requirements requires advanced financial, operational, and logistical coordination that is unavailable without the use of data analytics.

The COVID-19 Operational Software Suite allows the USCG to perform detailed analysis and cost projections. These projections identify lagging indicators of impacts related to the COVID-19 supply chain disruption and workforce shortages, providing USCG leadership the ability to adjust to operational challenges and schedule changes to ensure resilience to meet USCG readiness demands.

Hurricane Response and Reconstitution:

USCG has and will continue to respond to hurricanes and other natural disasters throughout the course of the pandemic. A key component to disaster response efforts is infrastructure reconstitution. USCG uses the COVID-19 Operational Software Suite to analyze Hurricane Reconstitution project locations, description, and status data to visualize and better understand COVID-19 impacts on the reconstitution of USCG shore infrastructure. USCG continues to repair and rebuild damaged USCG shore infrastructure, yet leadership needs to know how COVID-19 affects construction market activity restrictions, pricing trends, and supply chain impacts in these locations.

Office of Performance Management and Assessment (DCO-81):

As the COVID-19 pandemic continues, the Office of Performance Management and Assessment (DCO-81) must determine how the Deputy Commandant for Operations (DCO) should allocate mission hours to compensate for mission loss due to capacity reductions from COVID-19 infections, quarantines, or readiness shortfalls. DCO-81 uses the COVID-19 Operational Software Suite to conduct data analytics to ascertain asset capacity at the USCG Unit, Sector, District, and Area levels. The COVID-19 Operational Software Suite helps DCO-81 and DCO leadership determine the current and historical employment of assets (e.g., boats, aircraft) that are not available for operations.

Housing:

USCG must achieve a better understanding of maintenance priorities and impacts to USCG housing from environmental contaminants. USCG leadership uses the COVID-19 Operational



Software Suite to obtain a visualization of the COVID-19 vulnerabilities to USCG populations across the country.

Atlantic Area Command (LANTAREA):

The COVID-19 pandemic has significantly affected the USCG Atlantic Area Command (LANTAREA) operations. LANTAREA leadership must identify the degree to which the COVID-19 pandemic has affected its operations. LANT-81 uses the COVID-19 Operational Software Suite to gather a more complete analysis of the COVID-19 impact on LANTAREA operations. LANTAREA will ascertain asset capacity at the Unit, Sector, District, and Area levels of LANTAREA. LANT-81 and LANTAREA leadership use the COVID-19 Operational Software Suite to obtain a better understanding of what has already occurred, and what actions USCG should take in the event of a resurgence of COVID-19.

Categories of Individuals

The Strategic Resource and Asset Allocation Initiative maintains information on certain individuals:

- USCG Personnel (i.e., Active Duty, Reserve, USCG Civilian)

Source Systems

The Strategic Resource and Asset Allocation Initiative uses the following source systems:

- Abstract of Operations-Training Management Tool (AOPS-TMT);⁵⁶
- Asset Logistics Management Information System (ALMIS);⁵⁷
- Aviation Maintenance Information System (AMMIS);⁵⁸
- Decision Support System (DSS);⁵⁹
- Defense Property Accountability System (DPAS);⁶⁰
- Direct Access (DA);⁶¹

⁵⁶ See DHS/ALL-010 Asset Management Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁵⁷ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE ASSET LOGISTICS MANAGEMENT INFORMATION SYSTEM (ALMIS), DHS/USCG/PIA-025 (2018), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ See DHS/ALL-007 Accounts Payable, 83 FR 65705 (December 21, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.



- Financial Procurement Desktop (FPD);⁶²
- Fleet Logistics System (FLS);⁶³
- Housing Management Information System (HMIS);⁶⁴
- Naval Engineering Supply Support System (NESSS);⁶⁵ and
- Shore Asset Management System (SAMS).⁶⁶

Notable Data Fields

SFLC is the only use case that maintains data fields on certain USCG Personnel. The PII that supports this effort includes:

- Badge ID (Relates to an employee based on hours worked. Unique identifier to the NESSS system);
- Budget owner; and
- Person ID (NESSS username. Unique identifier to the NESSS system).

Open-Source Data

The following open-source sources are used:

- COVID-19 Cases/Death by County from USAFacts;
- Population Demographics from 2018 U.S. Census;
- CG District/Sector Shapes from Homeland Infrastructure Foundation-Level Data (HIFLD) Subcommittee;
- Weather data from the National Oceanic and Atmospheric Administration;
- State Stay-at-Home Policies from WikiData;
- World Health Organization (WHO) (e.g., WHO Novel Coronavirus SITREP);
- Department of Defense (DoD) (e.g., DoD Press Release);

⁶² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE CORE ACCOUNTING SUITE, DHS/USCG/PIA-009 (2009), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁶³ See DHS/ALL-004 General Information Technology Access Account Records System (GITAARS), 77 FR 70792 (November 27, 2012), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶⁴ See DHS/ALL-010 Asset Management Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶⁵ *Id.*

⁶⁶ *Id.*



- DHS (e.g., DHS Weekly Update); and
- Other federal agencies (e.g., White House Press Briefings, CDC MTS Recovery Support Daily Brief).

Special Requirements

There are no special requirements for the Strategic Resource and Asset Allocation Initiative.

SORNs and PIAs

Associated SORNs

- DHS/ALL-007 Accounts Payable System of Records;⁶⁷
- DHS/ALL-008 Accounts Receivable System of Records;⁶⁸
- DHA/ALL-010 Asset Management Records System of Records;⁶⁹ and
- DHS/USCG-032 Asset Logistics Management Information System (ALMIS).⁷⁰

PIAs

- DHS/USCG/PIA-009 Core Accounting Suite;⁷¹
- DHS/USCG/PIA-024 Direct Access;⁷² and
- DHS/USCG/PIA-025 Asset Logistics Management Information System (ALMIS).⁷³

⁶⁷ See DHS/ALL-007 Accounts Payable, 83 FR 65705 (December 21, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶⁸ See DHS/ALL-008 Accounts Receivable, 83 FR 65176 (December 19, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁶⁹ See DHS/ALL-010 Asset Management Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁰ See DHS/USCG-023 Asset Management Information System (ALMIS) System of Records, 83 FR 19087 (May 1, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷¹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE CORE ACCOUNTING SUITE, DHS/USCG/PIA-009 (2009), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁷² See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR DIRECT ACCESS, DHS/USCG/PIA-024 (2016), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁷³ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE ASSET LOGISTICS MANAGEMENT INFORMATION SYSTEM (ALMIS), DHS/USCG/PIA-025 (2018), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.



APPENDIX D: Operational Readiness Initiative

Last Update: 20 July 2021

USCG must maintain continuous operational readiness to conduct its 11 statutory missions throughout the COVID-19 pandemic. The COVID-19 Operational Software Suite allows the USCG to discover emerging risks, shifting patterns, and to assume a more proactive operational and risk-assessment posture during the COVID-19 pandemic. The data analytics will assist USCG users in the field to perform operations including preventing violations of law or regulations at and between ports of entry.

For instance, one shifting operational domain is domestic fisheries. The COVID-19 pandemic had sweeping impacts on U.S. fishing fleets. Because of COVID-19 outbreaks onboard certain vessels, the vessels were required to remain docked at U.S. piers. In the event of a COVID-19 outbreak, crewmembers were required to undergo a mandatory quarantine period, which further complicated logistics. According to NOAA, U.S. seafood exports declined 18 percent in value between January and June 2020 when compared to the preceding five years.

Data-driven decision-making is critical to successful USCG operations. The COVID-19 Operational Software Suite assists USCG leadership and operators to understand COVID-19 influences on USCG operational domains.

Use Cases:

The following use cases fall under the Operational Readiness Initiative:

Boat Forces Search and Rescue (SAR) Analysis:

Search and rescue is one of USCG's 11 statutory missions. As the COVID-19 pandemic continues, USCG Boat Forces leaders and analysts need better insight into SAR unit readiness and safety. USCG leadership must understand whether SAR units can meet critical operational objectives. Currently, Boat Forces continue to perform SAR missions, but COVID-19 has affected operational objectives. USCG leadership must determine how the activity level and reduced competency and proficiency among the boat crew personnel has influenced readiness levels during the pandemic. USCG leadership also need to know how this reduced level of readiness of boat crew and assets will affect current and future readiness. USCG needs to quantify how the COVID-19 pandemic has influenced the Boat Force operational readiness, mitigate any impact, and determine possible future trends for the USCG Boat Forces.

Categories of Individuals

The Operational Readiness Initiative does not maintain information on Members of the Public. This Initiative maintains information on certain individuals:



- USCG Personnel (e.g., Active Duty, Reserve, Civilian employees, Contractors).

Source Systems

The Operational Readiness Initiative uses the following Source Systems:

- Abstract of Operations-Training Management Tool (AOPS-TMT);
- Asset Logistics Management Information System (ALMIS); and
- Marine Information for Safety and Law Enforcement (MISLE).

Notable Data Fields

The following data fields support the Operational Readiness Initiative.

- Case ID (Unique identifier for the MISLE data);⁷⁴
- Resource Sortie ID;
- MLE Case Number;
- EMPLID (USCG Boat Forces Personnel);
- Name (USCG Boat Forces Personnel); and
- Resource Sortie Activity ID.

Open-Source Data

The following open-source sources are used:

- Weather data, ocean tides, fisheries permits/licenses, Federal License Limitation Program licenses, ocean temperatures, and Marine Protected Areas from NOAA;
- Catch data, by location and time, from the Regional Fishery Management Councils;
- Catch/landing data in the Alaska region, list of permit holders, and list of vessels/fisheries from the Alaska Department of Fish and Game (ADF&G); and
- Fishery landing data from Regional Fisheries Management Organizations.

Special Requirements

Any MISLE data is compartmentalized. Access is restricted to users that have an explicit and timely need to know.

⁷⁴ The MISLE system is the authenticating source for this data. The Case ID and Resource Sortie Activity ID is just a number with no identifying PII. However, the number can be used to identify a specific case that will contain PII that is not contained in the COVID-19 Operational Software Suite.



SORNs and PIAs

Associated SORNs

- DHS/ALL-010 Asset Management Records System of Records;⁷⁵
- DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE);⁷⁶
- DHS/USCG-031 USCG Law Enforcement (ULE) System of Records;⁷⁷ and
- DHS/USCG-032 Asset Logistics Management Information System (ALMIS).⁷⁸

PIAs

- DHS/USCG/PIA-008 Marine Information for Safety and Law Enforcement (MISLE);⁷⁹ and
- DHS/USCG/PIA-025 Asset Logistics Management Information System (ALMIS).⁸⁰

⁷⁵ See DHS/ALL-010 Asset Management Records, 80 FR 58280 (September 28, 2015), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁶ See DHS/USCG-013 Marine Information for Safety and Law Enforcement (MISLE), 74 FR 30305 (June 25, 2009), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁷ See DHS/USCG-031 USCG Law Enforcement (ULE) System of Records, 81 FR 88697 (December 8, 2016), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁸ See DHS/USCG-023 Asset Management Information System (ALMIS) System of Records, 83 FR 19087 (May 1, 2018), available at <https://www.dhs.gov/system-records-notices-sorns>.

⁷⁹ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR MARINE INFORMATION FOR SAFETY AND LAW ENFORCEMENT (MISLE), DHS/USCG/PIA-008 (2009), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.

⁸⁰ See U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. COAST GUARD, PRIVACY IMPACT ASSESSMENT FOR THE ASSET LOGISTICS MANAGEMENT INFORMATION SYSTEM (ALMIS), DHS/USCG/PIA-025 (2018), available at <https://www.dhs.gov/privacy-documents-us-coast-guard>.



APPENDIX E Open-Source Data

Last Update: 20 July 2021

The third-party vendor is using the following open-source data to integrate with USCG-owned data. This is publicly available and commercial data.

COVID-19 Cases/Death by County from USAFacts	Population Demographics from 2018 U.S. Census Bureau	USCG District/Sector Shapes from Homeland Infrastructure Foundation-Level Data (HIFLD) Subcommittee
COVID-19 Transmission from Wikipedia	CDC Travel Advisories from the U.S. Centers for Disease Control and Prevention (CDC)	State Stay-at-Home Policies from WikiData
World Health Organization (WHO) (e.g., WHO Novel Coronavirus SITREP)	U.S. Department of Defense (DoD) (e.g., DoD Press Release)	U.S. Department of Homeland Security (DHS) (e.g., DHS Weekly Update)
Other federal agencies (e.g., White House Press Briefings, CDC MTS Recovery Support Daily Brief)	Unemployment rates from the Bureau of Labor Statistics	Social Vulnerability Index from the CDC
COVID-19-related State Policies from WikiData	Population Demographics from the U.S. Census	Weather data from NOAA, includes weather stations and historical observations over the last couple of years
Higher Education Costs from College Scorecard at the U.S. Department of Education	Obesity rates from the CDC	Google search trends from Google Trends web service
Federal License Limitation Program licenses, ocean temperatures, and Marine Protected Areas from NOAA	Fishery Landing data, Catch data, by location and time from the Regional Fishery Management Councils	Catch/landing data in the Alaska region, list of permit holders, and list of vessels/fisheries from the Alaska Department of Fish and Game (ADF&G)