PRIVACY IMPACT ASSESSMENT (PIA)

For the

Integrated Total Army Personnel Data Base (ITAPDB)
U.S. Army Deputy Chief of Staff for Personnel (Army DCS G-1) Human Resources Command (HRC)

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

☐ (1) Yes, from members of the general public.

☐ (2) Yes, from Federal personnel* and/or Federal contractors.

☒ (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.

☐ (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- ☐ **New DoD Information System**
- ☐ **New Electronic Collection**
- ☒ **Existing DoD Information System**
- ☐ **Existing Electronic Collection**
- ☐ **Significantly Modified DoD Information System**

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- ☒ **Yes, DITPR** Enter DITPR System Identification Number: 78 (DA05357)
- ☐ **Yes, SIPRNET** Enter SIPRNET Identification Number:
- ☐ **No**

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- ☐ **Yes**
- ☒ **No**

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. Does this DoD information system or electronic collection require a Privacy Act System of Records Notice (SORN)?

A Privacy Act SORN is required if the information system or electronic collection contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

- ☒ **Yes**
- ☐ **No**

If "Yes," enter Privacy Act SORN Identifier A0600-8-104 AHRC

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: http://www.defenselink.mil/privacy/notices/

or

Date of submission for approval to Defense Privacy Office
Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an OMB Control Number?
Contact the Component Information Management Control Officer or DoD Clearance Officer for this information.

This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

☐ **Yes**

Enter OMB Control Number

Enter Expiration Date

☒ **No**

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) Cite the authority for this DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.)

(a) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect authority may be cited if the authority requires the operation or administration of a program, the execution of which will require the collection and maintenance of a system of records.

(c) DoD Components can use their general statutory grants of authority ("internal housekeeping") as the primary authority. The requirement, directive, or instruction implementing the statute within the DoD Component should be identified.

Title 5 U. S. Code Section 301, Departmental Regulations; Title 10 U. S. Code Section 3013, Secretary of the Army; and Executive Order 9397 as amended (SSN).

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

ITAPDB is the Army's Human Resource (HR) database that provides a single integrated source of data in support of contingencies, mobilization and peacetime operations for the Active Army, Army National Guard, Army Reserve components and Civilian personnel.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Due to the level of safeguarding, we believe the risk to individuals' privacy to be minimal. Appropriate safeguards are in place for the collection, use and safeguarding of information.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

☒ **Within the DoD Component.**

Specify. As required, additional internal Army agencies that could obtain access to PII in this system may include staff principals in the individual's chain of command; the Department of the Army Inspector General; the Army Audit Agency; the US Army Criminal Investigation Command; the US Army Intelligence and Security Command; the Provost Marshall General and Assistant Secretary of the Army for Financial Management and Comptroller; Active Army, Army National Guard, Army Reserve Command.

☒ **Other DoD Components.**

Specify. The Office of the Under Secretary of Defense for Personnel and Readiness, Personnel and Readiness Information Management, Defense Finance Accounting Service, US Navy, US Marine Corps, Defense Intelligence Agency, US Air Force, Joint Services Records Research Center, DoD Inspector General, Defense Manpower Data Center and Defense Criminal Investigative Service.

☒ **Other Federal Agencies.**

Specify. NA

☐ **State and Local Agencies.**

Specify.

☒ **Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify. Science Applications International Corporation (SAIC) contractual language acknowledges the sensitivity of PII and describes the importance of protecting and maintaining the confidentially and security of a Soldier's PII. The contractual language keys on training as a fundamental element in creating awareness and understanding of PII and why it is important to control and safeguard. The language also stresses securing PII material and equipment housing PII at the end of a work day. Contractual language directs and requires each SAIC employee in support of ITAPDB to have a valid Secret clearance prior to working on the program. The contract specifically states that contractor personnel will adhere to the Privacy Act, Title 5 of U.S. Code Section 522a, and all applicable agency rules and regulations.

☒ **Other** (e.g., commercial providers, colleges).

Specify. NA

i. Do individuals have the opportunity to object to the collection of their PII?

☐ **Yes** ☒ **No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object.

Since data are not collected directly from individual they are not provided either a Privacy Act Statement or a Privacy Advisory from ITAPDB. However, individuals implicitly consent to capture and use of that information at the time of employment or enlistment in the Armed Forces, at which time they are provided a Privacy Advisory.

j. Do individuals have the opportunity to consent to the specific uses of their PII?

☐ **Yes** ☒ **No**

(1) If "Yes," describe the method by which individuals can give or withhold their consent.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

Since data are not collected directly from individual they are not provided either a Privacy Act Statement or a Privacy Advisory from ITAPDB. However, individuals implicitly consent to capture and use of that information at the time of employment or enlistment in the Armed Forces, at which time they are provided a Privacy Advisory.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- ☐ **Privacy Act Statement**
- ☐ **Privacy Advisory**
- ☐ **Other**
- ☒ **None**

Describe each applicable format.