PRIVACY IMPACT ASSESSMENT (PIA)

For the

Forensic Toxicology Drug Testing Laboratory - Information Management System (FTDTL-IMS)

Department of the Army - US Army Medical Command (MEDCOM)

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: 7672 (DA95878)
- ☐ **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: A0600-85 DAPE

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.

10 U.S.C. 3013, Secretary of the Army; 42 U.S.C. 290dd-2; Federal Drug Free Workplace Act of 1988; Army Regulation 600-85, Army Substance Abuse Program; and E.O. 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.

The Forensic Toxicology Drug Testing Laboratory - Information Management System (FTDTL-IMS) is the umbrella system of applications required to implement the Congressionally-mandated testing of military and select government civilians for the presence of illegal Drugs. Drug testing is also conducted on personnel entering the military who have a pre-entrance test requirement, Reserve Officer Training Corps (ROTC) and Service academy cadets who are tested as part to their entrance examination. Test results may be used in litigation and PII data is required to maintain accurate records of the test results.

This PIA covers the following FTDTL-IMS components:

- Forensic Toxicology Drug Testing Laboratory – Web Reporting System (FTDTL-WRS)
- Drug Testing Program - Client Collection System (DTP-CCS)
- Laboratory Information Management System (LIMS)
- Drug Testing Program - Express (DTP Express)
- Drug Testing Program - Lite (DTPLite)
- National Guard Bureau Drug Testing Program (NGB-DTP)

Demographic data is collected in this system.

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

Risk	Mitigation
1. Inaccurate PII Data:	Data is provided from electronic unit rosters. Individuals who are selected for testing are required to review SSNs on documentation and initial entries to insure validity.
2. Unauthorized access to PII Data:	Access to applications with PII data is limited based on "Need To Know" basis and require login and password. Access logs track all attempts to gain access to servers and applications and are reviewed daily. Hard copy records are kept in locked containers and are shredded when no longer needed (six years).
3. Unauthorized Disclosure of PII Data:	Access to PII data is based on "Need To Know". Individuals are not granted access to servers, applications or data unless they have "Need To Know" and have approval by someone authorized to grant access. All hard copies containing PII data are kept in locked containers and are shredded when no longer needed. Tapes and disks with PII data are secured when not in use and are destroyed when no longer required.

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. Urine testing is done for individuals Army-wide. Data is shared with all supervisors and managers in all Army organizations.

☒ **Other DoD Components.**

Specify. Urine testing is done for individuals DOD-wide. Data is shared with all supervisors and managers in all DOD organizations.

☐ **Other Federal Agencies.**

Specify.

☐ **State and Local Agencies.**

Specify.

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

Specify. AllientCorps (W81K04-11-C-0002)
Para 2.4.7 Privacy Act: Access to information subject to the provisions of the Privacy Act is not normally required however, it is required when diagnosing and repairing software. Personnel shall adhere to the Privacy Act, Title 5 of the US Code, Section 552a and applicable agency rules and regulations.

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

Specify. Urine testing is done for Reserve Officers Training Corps students. Data is shared with military managers in colleges which host ROTC programs.

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.

The individual does not participate in the collection of the PII for this application. PII is collected from existing DoD systems, applications, and databases (unit rosters).

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.

The individual does not participate in the collection of the PII for this application. PII is collected from existing DoD systems, applications, and databases (unit rosters).

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.

The individual does not participate in the collection of the PII for this application. PII is collected from DoD existing systems, applications, and databases (unit rosters).

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.