



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Arlington National Cemetery Interment Scheduler System (ANC ISS)
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Arlington National Cemetery Provisional Oversight Group, OICO
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### **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
- 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

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**

Working with IMCO regarding OMB Control #

**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.

5 U.S.C. 301, Departmental Regulations  
10 U.S.C. 3013, Secretary of the Army  
Army Regulation 25-1, The Army Information Resources Management Program  
AR 210-190, Post Cemeteries  
DA Pamphlet 290-5, Administration, Operation, and Maintenance of Army Cemeteries  
Executive Order 9397 (SSNs), as amended.

**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.

Arlington National Cemetery - Interment Scheduler System (ANC ISS) is utilized to schedule and manage resources for ANC interments/inurnments. Service members, or their dependents, contact ANC to schedule an interment/inurnment for the deceased. If service members and/or their dependent(s) are to be interred together, a reservation for a living service member and/or their dependent(s) is also submitted. It is used by Arlington National Cemetery employees. Input - reservations and interment information are manually entered into the system by ANC. This system can be used to populate DA 2122, JUN 82 Record of Interment/Inurnment.

PII collected includes personal information and military records.

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

Security risks inherent in maintaining data in an electronic environment have been mitigated using a variety of technical, physical, and administrative safeguards. Physical records are located within restricted areas accessible only to authorized ANC personnel. Physical access is controlled by multiple access controls: alarm system, surveillance system, properly cleared and trained personnel with approved need-to-know plus computer hardware and software security features. All PII is encrypted and accessible only by designated users with an assigned user role on a need-to-know basis. Safeguards employed are commensurate with the risk that would result from loss, misuse, unauthorized access or modification of the data.

PII RISK is associated as HIGH due to the number of records maintained within the system.

**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.

All Army components and major commands which includes active Army Accessions Command, Army Audit Agency, Army Cadet Command, Army Criminal Investigation Command, Army Deputy Chief of Staff for Personnel, Army G1, Army Inspectors General, Army Intelligence and Security Command, Army Recruiting Command, Army Recruiting Information Support System, Army Research Institute, Army Reserve Command and to Commanders of the Army Reserves, Army Training and Doctrine Command, Assistant Secretary of the Army (Financial Management & Comptroller) , Department of the Army Inspectors General, Provost Marshal General, Army Staff Principals, within the chain of command, and supervisors and their designated human resources and administrative personnel responsible for processing personnel actions.

**Other DoD Components.**

Specify.

Defense Criminal Investigative Service, Defense Finance and Accounting Service, Defense Integrated Military Human Resources System, Defense Manpower Data Center, Defense Security Service, Department of Veterans Affairs, DoD Inspector General, Medical Command, National Guard Bureau,

Office of the DoD Inspector General, Office of the Secretary of Defense, Office of the Secretary of Defense Personnel and Readiness, and U.S. Military Entrance Processing Command.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

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

Specify.

The following contractors have access to the system: Booz Allen Hamilton; iBASEt; ArrowPoint, Lockheed MArtin, L3 Stratis and Excidion. Each contract has language similar to the content below.

1.6.7 Security Requirements:

1.6.7.1 The contractor is responsible for safeguarding information of a confidential or sensitive nature. Failure to safeguard any classified/privileged information which may involve the contractor or the contractor's personnel or to which they may have access may subject the contractor and/or the contractor's employees to criminal liability under Title 18, section 793 and 7908 of the United States Code. Provisions of the Privacy Act apply to all records and reports maintained by the contractor. All programs and materials developed at government expense during the course of this contract are the property of the government. At the time that the solicitation is issued, it should be accompanied by a Contract Security Specification, DD Form 254, in accordance with DoD Directive 5220.22-M, Department of Defense Industrial Security Manual for Safeguarding Classified Information, and any revisions, thereto, as well as Industrial Security Regulation DoD 5220.22-R. Failure to safeguard any classified/privileged information which may involve the contractor and/or the contractor's personnel or to which they may have access may subject the contractor and/or contractor's personnel to criminal liability under Title 18, section 793 and 7908 of the United States Code.

1.6.7.2 SecArmy memorandum dated 28 January 2006 on Contractor Verification System (CVS) Implementation provides guidance and instructions for the implementation of the CVS Army-wide. IAW that guidance, the authorizing official (Contracting Officer Representative (COR)), Contracting Officer Technical Representative (COTR), Contracting Officer, or other approving officials), the contractor's sponsor, approves issuance of the CAC through the automated CVS system. The COR in the BPA is the designated Trusted Agent (TA). Further delegation of that authority is determined at the installation level. The contractor's CVS applications under this task order should clearly cite the contract and task order numbers identified on the DD Form 1155 for this task order.

1.6.7.3 Physical Security. The contractor shall be responsible for safeguarding all government property provided for contractor use. At the close of each work period, government facilities, equipment, and materials shall be secured.

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

Specify.

**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.

To determine eligibility, individuals consent to the capture and use of this information when requesting interment/inurnment at ANC. Without this consent, ANC cannot determine eligibility and therefore would not be able to schedule the funeral service.

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

**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.

So that eligibility may be determined, individuals are consenting to the capture and use of this information when requesting interment at ANC.

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.

PRIVACY AUTHORIZATION STATEMENT TO COLLECT DATA  GENERAL - This notice is provided pursuant to Public/ Law 93-579, Privacy Act of 1974, as amended, 5, U.S.C. Section 552a, for individuals supplying information in order to request interment at Arlington National Cemetery.  AUTHORITY: 32 CFR 553, AR 290-5, EO 9397, as amended. PURPOSE: This information is used to certify individuals requesting burial meet eligibility requirements in ground and/or in columbarium interment/inurnment. The information will be used to order and place a government furnished marker.  ROUTINE USE(S): To the Department of Veteran Affairs for the purposes of issuing a government headstone. The DoD 'Blanket Routine Uses' set forth at the beginning of the Army's compilation of systems of records notices also apply to this system.  DISCLOSURE: Disclosure is Voluntary. However, failure to provide all the requested information will not allow processing of the Interment request.
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**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.