



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Promotion Point Worksheet - DA3355 (PPW)

US Army Deputy Chief of Staff for Personnel / 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 13241 (APMS ID DA201254)
- 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

A0680-31b 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 US Code, Sections 301, Departmental regulations, and 552(a), Records maintained on individuals; Title 10 US Code Sections 505(d), Reenlistments, 1176, Retention of enlisted members after 18 but less than 20 years of service, 1142, Pre-separation counseling, , 3013 (Secretary of the Army), 3258, Reenlistment after service as an officer, 3259-3261 repealed, Intelligence appropriations, 3914, Enlisted members with 20 to 30 years service, 3917, Enlisted members with 30 or more years service, 12301(a) and (d), Reserve components, 12302, Ready Reserve, 12304, Selected Reserve and certain IRR members, and 12305, Authority of President to suspend certain laws relating to promotion, retirement, and separation; Title 37 US Code Sections 308 and 309, Special pay: reenlistment bonus; AR 600-8-19, Enlisted Promotions and Reductions; and Executive Order 9397 as amended (SSN) 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.

The Promotion Point Worksheet - DA3355 (PPW) application is the automated promotion process for updating promotion points for Soldiers in the rank of E1 through E5. Record updates are either obtained through HRC or from the Soldiers' units, and used to update the Total Army Personnel Data Base - Active Enlisted and the Electronic Military Personnel Office.

Personal information collected includes personal identification and military record data.

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

All systems and environments have threats that seek to exploit and cause harm to the information. Some threats are natural, some are inherent in the system design, some can be attributed to unauthorized personnel, and some to authorized personnel who make mistakes. Four general categories of threats exist: human-intentional, human-unintentional, structural, and natural. The system is maintained in a controlled facility. Appropriate technical, personnel, physical and operational safeguards are in place for the access, collection, use and protection of information. Due to the level of safeguarding, we believe the risk to individuals' privacy to be minimal.

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. Staff principals in the 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 the Assistant Secretary of the Army for Financial Management and Comptroller.

Other DoD Components.

Specify. The Department of Defense Inspector General and the Defense Criminal Investigative Service.

Other Federal Agencies.

Specify. N/A

State and Local Agencies.

Specify. N/A

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

Specify. Science Applications International Corporation contractual language acknowledges

the sensitivity of PII and describes the importance of protecting and maintaining the confidentiality 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 ARTRAMS 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.

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.

Data are collected direct from Soldiers via the web, and they can object to its collection by refusing to provide it. PPW also retrieves data from information systems rather than directly from individuals, and individuals are not involved in that process. However, Soldiers implicitly consent to capture and use of that information at the time of employment or enlistment in the Department of the Army.

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

N/A

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.

Data are collected direct from Soldiers via the web, and they consent to its use by providing collection by refusing to provide it. PPW also retrieves data from information systems rather than directly from individuals, and individuals are not involved in that process. However, Soldiers implicitly consent to capture and use of that information at the time of employment or enlistment in the Department of the Army.

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

N/A

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.

A Privacy Act Statement is provided by PPW for review by Soldiers when they provide input to their DA Forms 3355:

DATA REQUIRED BY THE PRIVACY ACT OF 1974

AUTHORITY: Title 5 USC, Section 301.
PRINCIPLE PURPOSE: To determine eligibility for promotion.
ROUTINE USES: Reviewed to determine promotion eligibility and validity of points granted.
DISCLOSURE: The furnishing of fraudulent information may result in denial of promotion.

Data are also retrieved from Army information systems rather than directly from individuals, and Soldiers are not involved in the process. However, Soldiers implicitly consent to capture and use of their information at the time of employment or enlistment in the Department of the Army, at which time they are provided a Privacy Advisory.

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.