PRIVACY IMPACT ASSESSMENT (PIA)

For the

TAP-XXI - SOLDIER FOR LIFE - TRANSITION ASSISTANCE PROGRAM XXI

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: 6622 DA76884
- ☐ **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.

5 United States Code (USC) 301, Departmental Regulations; 10 USC 1142, Pre-separation counseling, transmittal of medical records to Department of Veterans Affairs; 10 USC 1143, Employment assistance; 10 USC 3013, Secretary of the Army; 10 USC Chapter 58, Benefits and Services for Members; Department of Defense Directive 1332.35, Transition Assistance For Military Personnel; Army Directive 2014-18, Army Career and Alumni Program; HQDA EXORD 054-12, Transition; The VOW to Hire Heroes Act of 2011; 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 Soldier For Life - Transition Assistance Program (SFL-TAP) XXI (TAP-XXI) application provides an interactive, multimedia approach to pre-separation counseling and job assistance training. This application uses full motion video, graphics, and sound to train clients and schedules clients for classroom-type instruction. TAP-XXI also provides office automation support for clients. It integrates a complete range of transition services and benefits for Soldiers, Department of Army civilian employees, and their family members as they transition from Active Duty. TAP-XXI is a web-based, three-tiered application with a centralized database for all SFL-TAP sites. The user interface is browser based, and the application is based on a storefront intranet model to provide access from within SFL-TAP centers. TAP-XXI includes TAP-XXI and two modules, TAP-Support and TAP-Online. Dedicated and/or specific hardware and software are not required to host TAP-XXI, TAP-Support or TAP-Online. The only exceptions are specific users who need access provided through a special arrangement with the production environment in network operations. All users access the application via Internet Explorer, version 6 or later. Aside from JavaScript validation of data entry fields, there is no application processing on the desktops located at SFL-TAP sites.

PII collected includes personal, contact, employment, 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. Army Inspector General; Army Audit Agency; US Army Criminal Investigation Command; US Army Intelligence and Security Command; Provost Marshal General; and Assistant Secretary of the Army for Financial Management and Comptroller.

☒ **Other DoD Components.**

Specify. Defense Manpower Data Center (DMDC), Department of Defense Inspector General, Defense Criminal Investigative Service; US Air Force; US Marine Corps; and US Navy.

☒ **Other Federal Agencies.**

Specify. National Guard Bureau; Department of Labor; Department of Veterans Affairs; and Veterans Administration.

☐ **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 (SAIC) contractual language acknowledges the sensitivity of PII and describes the importance of protecting and maintaining the confidentially and security of an individual'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 the system 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 552a, and all applicable agency rules and regulations.

SERCO Inc. contractual language describes security requirements addressing security and privacy, National Agency Checks, Privacy Act, and physical security aspects addressing PII safeguards. All personnel conduct support activities in accordance with AR 380-19.

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

Specify. N/A

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.

PII is provided by the applicant on DD Form 2648 , Preseparation Counseling Checklist for Active Component Service Members, DD Form 2648-1, Preseparation Counseling Checklist for Reserve Component Service Members Released from Active Duty, DD Form 2958, Service Member's Individual Transition Plan Checklist, or collected via electronic form on the TAP-XXI web site, and individuals can object to the collection by refusing to complete the forms. PII is also collected from existing information systems where individuals 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 Army, at which time they are provided a Privacy Advisory.

(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.

PII is provided by the applicant on DD Form 2648 , Preseparation Counseling Checklist for Active Component Service Members, DD Form 2648-1, Preseparation Counseling Checklist for Reserve Component Service Members Released from Active Duty, DD Form 2958, Service Member's Individual Transition Plan Checklist, or collected via electronic form on the TAP-XXI web site, and individuals consent to use of their PII by completing and submitting the forms. PII is also collected from existing information systems where individuals 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 Army, at which time they are provided a Privacy Advisory.

(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.

- [x] **Privacy Act Statement**
- [x] **Privacy Advisory**
- [ ] **Other**
- [ ] **None**

Describe each applicable format.

DD Forms 2648 and 2648-1 contain the following Privacy Act Statement:

"AUTHORITY: 10 U.S.C. 1142, Preseparation Counseling; transmittal of medical records to Department of Veterans Affairs, and E.O. 9397 (SSN) as amended.
PRINCIPAL PURPOSE(S): To record preseparation services and benefits requested by and provided to Service members; to identify preseparation (or transition) counseling areas of interest as a basis for development of an Individual Transition Plan (ITP). The signed preseparation counseling checklist will be maintained in the Service member's official personnel file. Title 10 U.S.C. 1142 requires that not later than 90 days before the date of separation, for anticipated losses, preseparation counseling for Service members be made available. For unanticipated losses, preseparation counseling shall be made available as soon as possible.
ROUTINE USE(S): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. Applicable Blanket Routine Use(s) are: Law Enforcement Routine Use, Congressional Inquiries, Disclosure to the Department of Justice for Litigation Routine Use, Disclosure of Information to the National Archives and Records Administration Routine Use, and Data Breach Remediation Purposes Routine Use. To the Department of Veterans Affairs and other federal agencies for the purpose of providing transition assistance and available benefits to the eligible Service member. The DoD Blanket Routine Uses set forth at the beginning of the Office of the Secretary of Defense (OSD) compilation of systems of records notices may apply to this system. The complete list of DoD Blanket Routine Uses can be found online at http://dpcld.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx. The applicable system of records notice is: DMDC 01, Defense Manpower Data Center Data Base. The SORNs may be found at http://dpcld.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570563/dmdc-01.aspx
DISCLOSURE: Disclosure is voluntary however it may not be possible to initiate preseparation counseling and other transition assistance services or develop an Individual Transition Plan (ITP) for a Service member if the information is not provided."