PRIVACY IMPACT ASSESSMENT (PIA)

For the

HRC Enterprise Data Warehouse (HEDW)

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: 17506, APMS (DA305540)
- ☐ **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: A0601-0210 AHRC TRADOC

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 USC Section 301 and 3111 (Acceptance of Volunteer Service); Title 10 Section 31 (Enlistments), 33 (Original appointments of regular officers in grades above warrant officer grads); 103 (Senior Reserve Officers' Training Corps), 503 (Enlistments: recruiting campaigns, compilation of directory information), 504 (Person not qualified), 12102 (Reserve components: qualifications), 2031 (Junior Reserve Officers' Training Corps), 133 (Under Secretary of Defense for Acquisition, Technology, and Logistics), 1588 (Authority to Accept Certain Voluntary Services); Title 32 USC Section 302 (Enlistments, reenlistments, and extensions), 313 (Appointments and enlistments: age limitations); Title 26 USC Section 641 (Information at Source); DODD 1145.2 (United States Military Entrance Processing Command); AR 145-1 (Senior Reserve Officer's Training Corps Program: Organization, Administration, and Training); AR 145-2 (Junior Reserve Officer's Training Corps Program: Organization, Administration, and Training); AR 350-1 (Army Training and Leader Development); AR 351-1 (Individual Military Education and Training); AR 601-1, Assignment of Enlisted Personnel to the U.S. Army Recruiting Command; AR 601-2 Army Promotional Recruiting Support Programs; AR 601-100 (Appointment of Commissioned and Warrant Officers in the Regular Army); AR 601-210 (Active and Reserve Components Enlistment Program); AR 601-222 (Armed Services Military Personnel Accession Testing Programs); AR 601-270 (Military Entrance Processing Station (MEPS); AR 614-100 (Officer Assignment Policies, Details, and Transfers); AR 614-200 (Enlisted Assignments and Utilization Management); USMEPCOM Regulation 680-3 (U.S. Military Processing Command Integrated Resources System (USMIRS)); 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.

Human Resources Command (HRC) Enterprise Data Warehouse (HEDW) provides accurate, integrated, reliable data of strategic and tactical importance that enhances accomplishment of the recruiting missions as well as Human Resource Command missions, and provides decision support capabilities within a flexible, secure, standards-based architecture. HEDW is a mature single analytical source for advertising, marketing, demographic, enlisted and officer recruiting and accessions life-cycle data and geo-coding, and is the authoritative repository for strategic recruiting decision making and analysis using a robust best practices Extract, Transform, and Load process to improve and ensure data quality, and to pull data from the various transactional source systems. HEDW is non-transactional, so reports and analytics can be pulled without affecting the performance of the transactional source systems, and data are included from other transactional systems within their analysis.

PII collected includes: Personal, Contact, Dependent and Relative, Medical, Employment, and Education information

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

The system and its components are maintained in a controlled, secure facility. Appropriate technical, personnel, physical and operational safeguards are in place for the access, collection, use and protection of information. Employees and appropriate contractor personnel are required to obtain security/information assurance training and certification based on system access levels and level of assigned responsibility. Data are passed via secure wide area networks or via use of virtual private networks. 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. US Army Military Academy, Department of the Army Inspector General, Army Audit Agency, US Army Criminal Investigation Command, US Army Intelligence and Security Command, Army Provost Marshal General, US Army Recruiting Command, National Guard Bureau, Army Deputy Chief of Staff (DCS) G-1, Army DCS G-2, Personnel Security Investigation Center of Excellence, US Army Cadet Command, US Army Reserve Command, and US Army Training and Doctrine Command.

☒ **Other DoD Components.**

Specify. Department of Defense Inspector General, Defense Criminal Investigative Service, Defense Finance and Accounting Service, US Military Entrance Processing Command, Defense Manpower Data Center, Defense Security Service, Office of the Under Secretary of Defense (OUSD) for Personnel and Readiness, Office of the Under Secretary of Defense for Intelligence.

☒ **Other Federal Agencies.**

Specify. Office of Personnel Management, Selective Service System, Social Security Administration, Department of Justice (FBI).

☐ **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 522a, and all applicable agency rules and regulations.

☐ **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.

N/A

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

Individuals are not involved in the data collection 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.

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.

N/A

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

Individuals are not involved in the data collection 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.

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.

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