



PRIVACY IMPACT ASSESSMENT (PIA)

For the

ACT - ARMY CAREER TRACKER

U.S. Army Training and Doctrine Command (TRADOC) G-3/5/7

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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

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 11339 DA186961
- 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 A0350-1b 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

0702-0136

Enter Expiration Date

31 Aug 19

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; Army Regulation (AR) 350-1, Army Training and Leader Development; E.O. 9397 (SSN), as amended; AR 600-20, Army Command Policy; AR 600-8-8, The Total Army Sponsorship Program; and AR 690-950, Career Management.

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.

Army Career Tracker (ACT) receives training, education, experiential learning, personal, and biographical data from several Army information systems and presents a comprehensive and personalized view of Department of the Army military members' career history, course enrollment, course completion, and course catalog information. End users will interface with a secure web site to develop their leadership capabilities.

ACT provides the following capabilities for Department of the Army military members, including Enlisted Soldiers, Officers, future Soldiers, and cadets, in all of the components (Active Duty, Army National Guard, and Army Reserve) and DA civilians

employed by the Army, and their leaders:

- View completed courses as well as enrolled courses
- View a personalized professional development model (PDM)
- View training and education opportunities recommended by their leaders
- View a single view of all scheduled activities such as enrollments, personal and professional goals, and events
- Search a single course catalog consisting of education and training opportunities delivered in a variety of formats
- Allows users to create goals and choose their leaders and mentors
- Upon acceptance of the leader or mentor role, the leader/mentor will be able to see the education, training, experiential learning, personal and biographical data of their subordinates
- Allows career counselors (Branch Managers/Career Program Managers/Career Field Managers) the ability to see the education, training, experiential learning, personal and biographical data of individuals in those respective career fields
- Forms based workflow for Sponsorship Program Counseling (DA 5434)

ACT tracks information regarding Individual Development Plan (IDP) such as personal and professional goals.

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

ACT is designed so that PII is viewable by only the affected end user, their selected leader or mentor(s), Army staff, and system administrators. ACT manages the risk of inadvertent exposure or release of PII by ensuring that ACT fully complies with RMF regulations. ACT complies with the DoD policies, regulations and standards governing security and data protection, especially PII data as defined in the Privacy Act according to the Army Privacy Program, AR 25-22. Specifically, ACT handles PII in accordance with the Department of Defense Privacy Program, DoD 5400.11-R and employs protection mechanisms that satisfy criteria for medium levels of robustness per DoDI 8500.2 and Federal Information Processing Standard (FIPS) 140-2. ACT uses CAC card authentication for universal access to the system; DMDC DS Logon may be used in a self service mode. Once an end-user authenticates, role-based security, enforced by the WebSphere Application Serve, displays information tailored to assigned permission. Access to subordinate data by Leaders/Mentors is provided after mutual concurrence by both parties. Visibility on education information governed by the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) requires user's consent. Army staff can perform analytics and workforce planning using the embedded Business Intelligence reporting capability. System Administrators will be carefully selected, vetted, managed and audited on a monthly basis. ACT's data center uses a DMZ, multiple firewalls, and an intrusion detection system (IDS) to protect the data. Furthermore, ACT encrypts both data in transit and data at rest. Vulnerability assessments are conducted as an adversary to validate and improve system operations security posture.

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 Component, Army Reserve Command, Army National Guard, Army Staff and Army Commands.

Other DoD Components.

Specify. Joint supervisors can view Army subordinates' information.

Other Federal Agencies.

Specify. Office of Personnel Management, Blanket Routine Uses apply to ACT.

State and Local Agencies.

Specify.

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

Specify. IBM in its role as the ACT technical contractor manages the ACT test/development and production environments receiving the PII via data exchange. The ACT contract requires compliance with the Risk Management Framework (RMF) process and implements technical and management controls in order to prevent inadvertent release of PII. Additional vetting is required for contractors having access to aggregated PII data.

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.

Users can decide to opt out of ACT by making a request with the ACT Help Desk. After the Help Desk takes action on this request, ACT will no longer display PII from other Army information systems for that individual and the individual will no longer have access to ACT. The individual can regain access by contacting the ACT Help Desk.

(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.

ACT users have to opportunity to consent to sharing PII with Leaders and Mentors. When users first log into ACT, they will select their leaders. Before selecting a leader or mentor, the user is presented with a privacy statement detailing what information will be shared with the Leader. The individual can give or withhold their consent at this point. Once selected the leader will be sent a inquiry asking whether they accept or reject this role. Only after acceptance will the leader be allowed to see their subordinate's PII.

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

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.	<p>ACT also provides a privacy act statement upon every login. End users will not be permitted to use ACT if they do not accept the prescribed conditions.</p> <p>PRIVACY ACT AND SECURITY NOTICE FOR ARMY CAREER TRACKER</p> <p>COOKIE INFORMATION: ACT does not use persistent cookies (tokens that stay after session closeout and pass information between the client machine and the server). ACT will use session cookies (token that remain active only until you close your browser) in order to personalize the site information.</p> <p>SITE SECURITY: Records are maintained in a secured Army data center where physical security and operation security measures are implemented IAW RMF and pertinent security regulations.</p> <p>PRIVACY ACT STUDENT CONSENT FOR RELEASE OF U.S. ARMY TRAINING RECORDS TO A THIRD PARTY</p> <p>The Privacy Act of 1974 prohibits any department or agency of the Federal Government from releasing any personal information about an individual, to a third party, without consent of the subject of the record unless an approved exception applies.</p>
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