PRIVACY IMPACT ASSESSMENT (PIA)

For the

Alternate Assessment Database (AAD)
Department of Defense Education Activity (DoDEA)

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 | 14563 |

☐ **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 | 007-97-02-07-02-6478-00 |

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 <u>retrieved</u> by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

☒ Yes   ☐ No

If "Yes," enter Privacy Act SORN Identifier | DoDEA 26 |

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.

The student information collected such as name, race, gender, student ID numbers, already exists in the other system which is Student Management Solutions (SMS).

10 U.S.C. 113, Secretary of Defense;
10 U.S.C. 2164, Department of Defense Domestic Dependent Elementary and Secondary Schools;
20 U.S.C. 921-932, Overseas Defense Dependent's Education;
29 U.S.C. 794, Nondiscrimination under Federal Grants and Programs;
DoD Directive 1342.20, Department of Defense Education Activity (DoDEA);
DoD Directive 1020.1, Nondiscrimination on the Basis of Handicap in Programs and Activities Conducted by the Department of Defense; and E.O. 9397 (SSN), as amended.

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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.

To capture alternate assessment test scores for students who are unable to participate in the standard DoDEA system-wide assessment with accommodations. Student scores will be used to generate reports summarizing individual student performance as well as district, area, system-wide student performance.

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

Student's name and date of birth can identify the student ID number. Information Management and Technology Division provides security protection for the system, including physical security for servers, hardware and software firewalls, requiring user ID and password for network access, and limiting users to role-appropriate access to the application and database.

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. | DoDEA, DoDDS-Pacific, and DoDDS-Europe - Special Education and Student Services, System Administrator

☐ **Other DoD Components.**

　　Specify. | .

☐ **Other Federal Agencies.**

　　Specify. |

☐ **State and Local Agencies.**

　　Specify. |

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

　　Specify. |

☐ **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.

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

Data is retrieved from existing system, Student Management Solutions (SMS).

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.

See above in Section 2.i.2.

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.	N/A

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.