



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Impact AID Database
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
- 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
- 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

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.

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 Department of Defense Education Activity's (DoDEA) Educational Partnership Branch is responsible for administering the DoD Impact Aid programs, consistent with its mission of developing, promoting and maintaining partnerships and communications with local school districts. The impact AID application will store PII of District contact persons to include first and last name.

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

The perceived threats are primarily computer hackers, disgruntled employees, state sponsored information warfare, and acts of nature (e.g., fire, flood, etc.).

All systems are at risk because they may be vulnerable to unauthorized intrusion and hacking. There are risks that Impact AID, with its extensive collection of PII, could be compromised.

Because of this possibility, appropriate security and access controls listed in this PIA are in place.

All systems are vulnerable to "insider threats." Systems Administrators are vigilant to this threat by limiting system access to those individuals who have a defined need to access the information. There are defined criteria to identify who should have access to the Impact AID system.

Mitigation:

The following controls are used to mitigate the risks:

a) Access Controls. Access controls limit access to the application and/or specific functional areas of the application. These controls consist of privileges, general access, password control and discretionary access control. Additionally, each user is associated with one or more database roles. Each role provides some combination of privileges to a subset of the application tables. Users are granted only those privileges that are necessary for their job requirements. The same roles that protect the database tables also determine which buttons and menu items are enabled for the user currently logged on.

b) Confidentiality. This ensures that data is not made available or disclosed to unauthorized individuals, entities, or processes.

c) Physical Security. This consists of placing servers that contain privileged information in a secure and protected location, and to limit access to this location to individuals who have a need to access the servers. An internal policy is set in place to ensure that there are always no less than two users present at a time when privileged information is being retrieved. Since the server and data reside within a DON establishment, the strict security measures set by the establishment are always followed.

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.

The data will be used to determine grant eligibility

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.

All data in the system is provided to us directly from the Department of Education.

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.

[Empty rectangular box]

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

All data in the system is provided to us directly from the Department of Education.

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.

[Large empty rectangular box for describing applicable formats]

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.