PRIVACY IMPACT ASSESSMENT (PIA)

For the

Adjunct Faculty Information Database
Defense Security Cooperation Agency / Defense Institute of International Legal Studies

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
- ☐ **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 DSCA 04 (pending review)

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.

10 U.S.C. 126, Transfer of Funds and Employees; 10 U.S.C. 134, Under Secretary of Defense for Policy; DoD Directive 5105.65, Defense Security Cooperation Agency (DSCA); DoD Directive 5101.1, DoD Executive Agent; DoD Directive 5123.03, DoD Policy and Responsibilities Relating to Security Cooperation; Executive Order 9397 (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 purpose of this database is to collect supplied information from qualified adjunct faculty members to make preparations for their overseas travel assignments as well as maintain a record of their qualifications for participation in future programs. This data will also be used as a resource for future assignments, as a record of adjunct assignments and a basis to identify training requirements for the faculty.

The types of personal information collected is as follows: full name, date and place of birth, social security number, home and work addresses, work, fax, home and personal cell phone numbers, US government credit card number, personal and alternative e-mail addresses, pay grade, military status (e.g., military rank, branch of service, retired and reserves), security clearance and current status, passport information, language capability, self-rating/level of expertise and abilities, training completed (e.g, trafficking in persons, human rights, code of conduct, etc.), biography, and professional references.

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

The primary risk with this database would be the disclosure of PII to an unauthorized source. DIILS has addressed potential risks with the following safeguards:

- access to computerized data is restricted by centralized access control including Common Access Cards (CAC), password protection (which is changed periodically), intrusion detection systems, and located in a secured facility with restricted access to person(s) properly screened and cleared for need-to-know basis to carry out DIILS' mission;

- access to computerized data containing individual SSNs is restricted by "blocking out" the numbers when viewed;

- access to computerized data and the use and dissemination of this data is controlled in a secured database using industry standards and best practices thereby minimizing the risk of unauthorized disclosure.

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. DSCA

☒ **Other DoD Components.**

Specify. COMBATANT COMMANDS (COCOMS), US EMBASSY PERSONNEL, OFFICE OF SECRETARY OF DEFENSE (OSD)

☒ **Other Federal Agencies.**

Specify. DEPARTMENT OF STATE

☐ **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.

Individuals have the option of providing their PII data or not -- it is strictly voluntary. Moreover, individuals may contact DIILS and request to have all their PII removed from the system if they so desire.

(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.

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

The PII requested is specifically restrictive to the nature of the mission. Potential Adjunct Instructors can not restrict the use of their PII if they are requesting to participate in DIILS overseas education programs and training sessions.

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.	The Adjunct Faculty Application form used to solicit the PII data from each potential applicant contains the appropriate Privacy Act Statement. The statement outlines the legal authority, purpose, routine use for the collection, as well as, whether or not the information is voluntary and the effects of not providing all or any part of the requested information.

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.