



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Benchmark Assessment System Online Data Management System (BAS ODMS)

Department of Defense Education Activity

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

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. 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.

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 the Benchmark Assessment Online Data Management System (BAS ODMS) is to maintain a record of K-3 student reading proficiency data. The system is organized into 3 sections: Classes, Assessments, and Reports. Teachers, school administrators, and above-school level personnel on the district, area, and HQ level can view student and class data. Personal information collected in the system includes a DoDEA-approved naming convention consisting of first letter of first name, first three letters of last name, last four letters of student ID#, student ID #, gender, date of birth, race/ethnicity, English Language Learners (ELL), Special Education Services, and Additional Reading Services, BAS Independent Level, BAS Instructional Level, recommended Placement Level and Other. Once a class is created, teachers include grade level information, start and end dates of the school year, and the text level goals for the students throughout the school year.

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

Privacy risks are minimized because of the following factors:
(1) Students are not identified by their first or last name.
(2) A username and password is required to access the online data management system.
(3) Information in the online data management system is restricted to those stakeholders given access on a hierarchical level; DoDEA area, district, school, and class.

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.

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.

Contractor: Heinemann Publishing; Contract: "All online resources and instructional software shall meet DoDEA information security requirements, such as not containing vulnerabilities posing risk to the network."

[Empty text box]

Other (e.g., commercial providers, colleges).

Specify.

[Empty text box]

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.

[Empty text box]

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

PII was collected during the student registration process (DoDEA Form 600). Privacy rights are explained on DoDEA Form 600.

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 text box]

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

PII was collected during the student registration process (DoDEA Form 600). Privacy rights are explained on DoDEA Form 600.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

PII was collected during the student registration process (DoDEA Form 600). The Privacy Act Statement, Authority 10 USC 2164 and 20 USC 921, is included on the Student Registration Form 600.

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.