PRIVACY IMPACT ASSESSMENT (PIA)

For the

Marine Corps Training Information Management System (MCTIMS)
Department of Navy - United States Marine Corps

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   DITPR ID: 8712   DITPR DON ID: 21448

☐ **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   UII: 007- 000002414

> 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 underlined 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   NM01500-2

> 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.

SORN NM01500-2 authorities:

10 U.S.C. 5013, Secretary of the Navy
10 U.S.C. 5041, Headquarters, Marine Corps function, composition
OPNAVINST 1510.10B, Corporate Enterprise Training Activity Resource System (CeTARS), Catalog of Navy Training Courses and Student Reporting Requirements
MCO 1580.7D Schools Inter-service Training
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.

MCTIMS is an enterprise integrated web-based, multi-user system that supports Marine Corps training development, delivery management, reports, executive information and metrics, and Marine unit and individual Marine training. MCTIMS receives and maintains course, class and student information from the Marine Corps schools and Agencies and from external systems to provide a central repository to track students and completion/incompletion information.   MCTIMS also provides quotas, courses, and class schedules to other Marine Corps and other Services personnel assignment systems. MCTIMS provides class rosters, reports and tracks attrition for use by the school houses or Military Occupational Specialty (MOS) producing schools. Functional capabilities include Unit Training Module (UTM), Individual Marine Management (IMM), and Marine Electronic Training Jacket (ETJ) modules to support and record training for Marine units and individual Marines worldwide. MCTIMS includes a Training Resource Module to support curriculum development and make the curriculum and supporting materials available for Marine-wide use as well as for formal schools. MCTIMS includes unclassified sensitive data with PII. MCTIMS is the Marine Corps "Authoritative Data Source" for Training.

Personal information collected: Name, SSN, Other ID Number (EDIPI), Citizenship, Gender, Race/Ethnicity, Birth Date, Home Telephone Number, Religious Preference, Security Clearance, Marital Status, Child Information, Medical Information, Military Records, Education Information.

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

As with many information technology systems, MCTIMS has potential privacy risks in the areas of identity theft, unsolicited marketing, loss of customer faith in protecting their information, and compromise of sensitive information. However, potential privacy risks are mitigated through access restrictions, user roles and permissions, and annual Privacy and PII training. MCTIMS is used exclusively by authorized military, DoD personnel and contractor personnel supporting DoD. PII is shared and or released only after the individual has provided written consent using the standard Privacy Act Statement Release form. Only those users with the Administrator role are able to provide access to the MCTIMS application. Access to MCTIMS is provided on a need-to-know basis and via a valid Public Key Infrastructure (PKI) enabled authentication. All MCTIMS users (to include contractors) receive mandatory Marine Corps/DISA sponsored Privacy Act and PII protection, PII breach Incident Response, and spillage Incident response training annually to help safeguard the PII resident in MCTIMS. These annual PII training sessions include safe handling procedures that cover receiving , viewing, printing, forwarding, marking, storing and disposal of PII data.

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.

System: Marine Corps Distance Learning Program (Marine Net)
Information Owner: USMC Training and Education Command (TECOM)

System: Marine Corps Recruiting Information Support System: (MCRISS)
Information Owner: Marine Corps Recruiting Command (MCRC)

System: Marine Corps Total Force System (MCTFS)
Information Owners - Jointly: USMC Manpower & Reserve Affairs (M&RA) & Defense Finance and Accounting Services (DFAS)

System: Operational Data Store Enterprise (ODSE)

Information Owners - Jointly: USMC Manpower & Reserve Affairs (M&RA) & Defense Finance and Accounting Services (DFAS)

System: Total Force Data Warehouse (TFDW)
Information Owner: USMC M&RA

System: Defense Readiness Reporting System – Marine Corps (DRRS-MC)
Information Owner: HQMC, PP&O

System: Manpower Models (MODELS)
Information Owner: USMC M&RA

☒ **Other DoD Components.**

Specify.

System: Army Training Requirements and Resources System (ATRRS)
Information Owner: Army Training and Doctrine Command (TRADOC)

System:Corporate Enterprise Training Activity Resources System (CeTARS)
Information Owner: Naval Education & Training Command (NETC)

System: Defense Manpower Data Center (DMDC)
Information Owner: DMDC

System: Sailor/Marine American Council on Education Registry Transcript (SMART)
Information Owner: Navy College Center

System: Naval Aviation Maintenance Training Continuum System (AMTCS)
AMTCS Software Module (ASM)
Information Owner: Naval Air Systems Command (NAVAIR),

System: Military Personnel Data System - Oracle Training Administration (MilPDS-OTA)
Information Owner: Air Force Personnel Operations Agency

☐ **Other Federal Agencies.**

Specify.

☐ **State and Local Agencies.**

Specify.

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

Specify.

InfoReliance. Contractors sign a Non Disclosure Agreement (NDA) to assure confidentiality between the contractor and the government to protect any type of confidential and proprietary information. Specific language in the contract is described as:

Security measures shall be taken to satisfy the security requirements in accordance with the Marine Corps System Security Plan. MCTIMS data/information shall be protected from an Information Security (INFOSEC) perspective. The contractor shall

apply security considerations to software design and management.

MCTIMS shall share PII with contractors who have a valid need to know and a favorable adjudicated background investigation. Contractors may be exposed to PII while testing and maintaining MCTIMS. A Secret clearance will be required for personnel requiring access to the Information Technology Data Center, Quantico (ITDC-Q).

The two FAR Privacy Clauses are included in the contract.

☐ **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.

PII for Marines and select Sailors is pulled from the ODSE system. PII for other Sailors (not resident in ODSE), Government civilians, other Service personnel, and foreign nationals are manually entered by schoolhouse administrators when they are registering for a school seat. If not provided the student would not be able to register.

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.

PII for Marines and select Sailors is pulled from the ODSE system. PII for other Sailors (not resident in ODSE), Government civilians, other Service personnel, and foreign nationals are manually entered by schoolhouse administrators when they are registering for a school seat. If not provided the student would not be able to register.

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 Privacy Act Statement is presented when a user logs into MCTIMS and requires all users to acknowledge each and every time before allowing system access.

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.