PRIVACY IMPACT ASSESSMENT (PIA)

For the

Marine Sierra Hotel Aviation Readiness Program (M-SHARP)
Department of the Navy - United States Marine Corps (USMC)

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 | DADMS ID: 81383 |

☐ **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 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 | M05420-2 |

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 Authorities:

10 U.S.C. 5013, Secretary of the Navy
10 U.S.C. 5041, Headquarters, U.S. Marine Corps
OPNAVINST 3710.7T NATOPS, General Flight and Operating Instructions
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 Marine Sierra Hotel Aviation Readiness Program (M-SHARP) enables aviators to log post flight data including training, readiness, resource expenditures, and flight hours. Aggregation of this data allows for the calculation of squadron training readiness levels. The software also allows management of crew qualifications, designations, and scheduling of flight, ground, and duty events. With this information, aviation squadrons are better able to intelligently plan and schedule future training events to include flights, simulators and ground events. In addition, both systems offer a reporting interface that allows squadron personnel to create both predefined and custom reports along with the ability to manage all variations of crew configurations (single seat to multi-person crews) across all aviation communities in the Navy and Marine Corps. Further, the Marine Corps has extended its use of M-SHARP to the non-flying communities within Marine Aviation (air defense, airfield operations/emergency service, air traffic control, etc.) for training and readiness management.

The M-SHARP system collects the following personal information:

1. Social Security Number (full and truncated)
2. Rank/Rate
3. First Name
4. Last Name
5. Date of birth (optional)

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

All systems are vulnerable to "insider threats." All System Managers will be vigilant to this threat by limiting system access to those individuals who have a defined need to access this information. There are defined criteria to identify who should have access to the applications. These individuals have gone through extensive background and employment checks.

The application mitigates PII risks upon creation within the application. SSN is immediately encrypted using Advanced Encryption Standard (AES) specification adopted by the U.S. government via a Rijndael provider. A 128 bit encryption key is provided for each SSN upon creation of the record and is not retrievable within the user interface layer. A query within the database looking for SSN will return a random variable character string.

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. | Navy/USMC - Aircraft maintenance users of NALCOMIS/OOMA |

☒   **Other DoD Components.**

Specify. [   ]

☐ **Other Federal Agencies.**

Specify. [N/A   ]

☐ **State and Local Agencies.**

Specify. [N/A   ]

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

Specify.
InnovaSystems International,
"No data, materials or other items created or provided expressly for this contract shall be used by the contractor for any purpose other than the support and performance under this contract without the prior written permission of the Contracting Officer.The contractor is obligated to protect from unauthorized use or disclosure all government confidential or classified material and government owned proprietary data obtained in the course of performance of services under government contract as long as such data remains proprietary, confidential or classified.

☐ **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 can object at the time they arrive at their unit with the unit's M-SHARP administrator located in the Operations Department (S-3/G-3). The M-SHARP application contains minimal PII. Individuals could elect not to provide PII when applying for access; however, failure to provide the requested information may impede, delay, or prevent further processing of an account request and the tracking of their flight training.

(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 M-SHARP application contains only that PII which is essential for discrete identification of individual training records and for interoperability with NALCOMIS.

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 M-SHARP Program Office at TECOM Aviation Training Division will ensure that the requirements needed to be in compliance with Marine Corps Enterprise Information Assurance Directive 011, Personally Identifiable Information (PII) 09 April 2009 are implemented at the earliest possible date (this requirement was not included under the current contract but will be added to the current/follow-on scope of work).

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.