PRIVACY IMPACT ASSESSMENT (PIA)

For the

Marine Corps Distance Learning (MCDL)
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: 20385   DITPR DON ID: 5130 |

☐ **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: 007-000003448 |

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 | 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 authorities:

(1) 10 U.S.C. 5013, Secretary of The Navy
(2) 37 U.S.C. 5031, Office of the Chief of Naval Operations: function
(3) 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN);
(4) 5 U.S.C. 301, Departmental Regulations;
(5) 14 U.S.C. 93, Commandant, U.S. Coast Guard General Powers;
(6) 10 U.S.C. 8013, Secretary of the Air Force;
(7) 10 U.S.C. Section 3013, Secretary of The Army;
(8) E.O 9397 (SSN).

Other authorities:

(9) DoD Directive 1322.18 Military Training
(10) DoD Instruction 1322.20 Development and Management of Interactive Courseware
(11) DoD Directive 8320.0 Data-Sharing in a Net-Centric Department of Defense
(12) DoD Directive 81001.1 Global Information Grid (GIG) Overarching Policy
(13) DoD Instruction 1322.26

---

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.

Marine Corps Distance Learning (MCDL) hosts MarineNet, an online system that provides distance learning for the Marine Corps, including all active duty and reserve Marines, their family members, and DoD civilians and contractors. The system owner is Marine Corps System Command (MARCORSYSCOM), Program Manager for Training Systems (PMTRASYS). MarineNet is available online in garrison, over the commercial internet, and while deployed. The system consists of a centralized learning management system (LMS) located in Pax River, MD and distributed content hosted on the Marine Corps Enterprise Network (MCEN).

MarineNet records full name, Social Security Number (SSN), Date of Birth (DoB), Military Occupational Specialty (MOS), Rank, Branch, Service Status, both home and work Address and Phone Number.

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

The privacy risks associated with MCDL include unauthorized access or inappropriate dissemination of PII. These risks are common among any collection of PII; however, as MarineNet is a public facing website, these risks are increased. Per DoD and Marine Corps policy, the system has been certified and accredited to operate on the MCEN. This accreditation validates security controls that will help enhance the protection of PII. Further, all collection and transmission of PII is conducted over 128-bit Secure Socket Layer (SSL) connections.

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.   Marine Corps Total Force System (MCTFS), Marine Corps Training and Information Management System (MCTIMS)

☒ **Other DoD Components.**

Specify.   Defense Manpower Data Center (DMDC)

☐ **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.

Individuals can object to the collection of their PII, but failure to submit the information will result in a user's inability to access MCDL/MarineNet content.

Registration is required for access to MCDL/MarineNet. Users are informed that their information is needed via the Privacy Act Statement provided on the website. If a potential user needs to access content hosted on MCDL/MarineNet, collection of pertinent registration information (SSN, Full Name, DoB, and e-mail address) is necessary.

    (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.

Information collected during registration is needed to verify and identify users. MCDL/MarineNet only collects the information needed to perform those tasks.

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.	AUTHORITY: Title 10 U.S. Code §§ Section 113 Secretary of Defense, Section 5013, Secretary of the Navy, 10 U.S.C. 5041 Headquarters Marine Corps; 5 U.S.C. 301, Departmental Regulations; 14 U.S.C. 93, Commandant, U.S. Coast Guard General Powers; 10 U.S.C. 8013, Secretary of the Air Force; 10 U.S.C. Section 3013, Secretary of The Army; E.O 9397 (SSN). PURPOSE: This information will be used to verify the identity of eligible users of the MarineNet Distance Learning System. ROUTINE USES: None. The "Blanket Routine Uses" set forth by the Department of Defense. DISCLOSURE: Voluntary. However, failure to provide the requested information will result in denial of access to the MarineNet system. Why do we need your Social Security Number? We request your Social Security Number (SSN) and Date of Birth (DoB) during the account creation process only to authenticate who you are. The information you provide is compared with your information in the Marine Corps Total Force Structure (MCTFS) system if you are an active duty Marine or Marine Civilian in MCTFS, or this information is compared with your information in the Defense Manpower Data Center (DMDC) for all other service members, DOD civilians, and dependents. The information is used solely to verify that you are authorized to have a MarineNet account. This data is already in the MCTFS and/or DMDC systems. The Commandant of the Marine Corps (MCTFS) and the Secretary of Defense (DMDC) are both authorized to use the data for verification purposes. Your SSN will be stored with your account when it is created, but it is not shared with any other agency or organization, it is not part of your user name, and it is used only as a discriminator during multiple identity instances. Is it safe? Security during registration is ensured using a 128-bit Secure Socket Layer (SSL) connection. This is the highest industry standard and establishes an encrypted session between your computer and MarineNet. We use the same technology other major companies operating on the World Wide Web (WWW) use to protect personal information and guard against identity theft. Look for the little yellow padlock at the bottom of your browser window to ensure you have established a secure connection.

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.