

## PRIVACY IMPACT ASSESSMENT (PIA)

**PRESCRIBING AUTHORITY:** DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

### 1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:

Advanced Distributed Learning's (ADL) Moodle / cmi5 Player / SQL LRS

### 2. DOD COMPONENT NAME:

Defense Human Resources Activity

### 3. PIA APPROVAL DATE:

Defense Support Services Center

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

#### a. The PII is: (Check one. Note: foreign nationals are included in general public.)

- ☐ From members of the general public ☒ From Federal employees and/or Federal contractors
- ☐ From both members of the general public and Federal employees and/or Federal contractors ☐ Not Collected (if checked proceed to Section 4)

#### b. The PII is in a: (Check one)

- ☒ New DoD Information System ☐ New Electronic Collection
- ☐ Existing DoD Information System ☐ Existing Electronic Collection
- ☐ Significantly Modified DoD Information System

#### c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.

The Moodle Learning Management System is a platform designed to provide educators, administrators and learners with a secure and integrated system to deliver courses and instructional content within a personalized learning environments. Learner records are used to track, manage, and deliver instructional resources to each learner. Learner progress and performance is measured to assess proficiency against competency-based learning objectives. Learner records are also generated to support statistical analysis, document evidence of learner proficiency, and reporting requirements (e.g., student completions of a course). The types of personal information being collected include: DoD ID, first name, last name, date of rank, military branch, occupation, duty station, joint professional military education status, joint qualification level, skill code, DoD email address. Other types of personal information include learner performance information such as course completions, pass/fail status, grades, proficiency levels, and other information about each learner's interaction with a course (e.g., registration, course progress, preferences).

The Moodle cmi plugin uses the cmi5 player to deliver courses and content that track performance across the different activities that a course is comprised of. Unlike traditional Online courses, the cmi5 player allows blended instruction so that curriculum can include non-browser-based activities, such as serious games, mobile applications, virtual classrooms, and other forms of digital learning. The types of personal information being collected include: DoD ID, first name, last name, date of rank, military branch, occupation, duty station, joint professional military education status, joint qualification level, skill code, DoD email address. Other types of personal information include learner performance information such as course completions, pass/fail status, grades, proficiency levels, and other information about each learner's interaction with a course (e.g., registration, course progress, preferences).

The SQL LRS is an open source xAPI learning Record store. The IEEE 9274.1 Experience API standard is used to track and store information about learner performance as they navigate through different learning activities that occur within the Moodle LMS or within the cmi5 player. The SQL LRS validates and stores xAPI statements being collected from one or more xAPI conformant learning activities. The types of personal information being collected include: DoD ID, first name, last name, date of rank, military branch, occupation, duty station, joint professional military education status, joint qualification level, skill code, DoD email address. Other types of personal information include learner performance information such as course completions, pass/fail status, grades, proficiency levels, and other information about each learner's interaction with a course (e.g., registration, course progress, preferences).

**d. Why is the PII collected and/or what is the intended use of the PII?** (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

PII is collected for the purposes of tracking learner interactions, performance, course completions, and other mission related uses. The information retained in SQL LRS is used to manage the delivery of training and education content to individual learners based on their individual learner goals (e.g., course goals, career goals), interactions (e.g., registered, completed, passed), performance (e.g., outcomes, proficiency levels, grades) across different programs of instruction delivered by connected systems. This system is used to store and route learner data to other DoD systems. PII is used to maintain individual records within the Learning/training/certification process and for use with other systems for verification, identification, authentication in mission and administrative operations.

**e. Do individuals have the opportunity to object to the collection of their PII?** ☐ Yes ☒ No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

Disclosure is provided upon accessing Moodle and upon registering for Moodle courses. The data is used to ensure students are meeting academic standards and to monitor their progress. Students can opt to not participate in the course and thus opt out of the collection of data, however, opting out may delay or prohibit their completion of courses.

**f. 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.

Disclosure is provided upon accessing Moodle and upon registering for Moodle courses. The data is used to ensure students are meeting academic standards and to monitor their progress.

**g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided.** (Check as appropriate and provide the actual wording.)

☐ Privacy Act Statement ☐ Privacy Advisory ☒ Not Applicable

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component?** (Check all that apply)

☒ Within the DoD Component

Specify. OUSD(P&R)

☒ Other DoD Components

Specify. DoD Enterprise

☐ Other Federal Agencies

Specify.

☐ State and Local Agencies

Specify.

☐ Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

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

Specify.

**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

☐ Individuals

☐ Databases

☒ Existing DoD Information Systems

☐ Commercial Systems

☐ Other Federal Information Systems

**j. How will the information be collected?** (Check all that apply and list all Official Form Numbers if applicable)

- |  |  |
|--|--|
| <input type="checkbox"/> E-mail  | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> Face-to-Face Contact  | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax   | <input type="checkbox"/> Telephone Interview                                   |
| <input checked="" type="checkbox"/> Information Sharing - System to System                   | <input type="checkbox"/> Website/E-Form  |
| <input checked="" type="checkbox"/> Other (If Other, enter the information in the box below) |  |

The Moodle LMS, cmi5 Player, and SQL LRS are instrumented with the IEEE 9274.1 Experience API (xAPI) to track user searches, allow users to save courses that interest them, and curate lists of courses required to meet individual / career learning goals. xAPI statements that track user interactions are stored in a SQL database.

**k. 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 must be consistent.

☒ Yes ☐ No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/Privacy/SORNs/>  
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

**l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?**

(1) NARA Job Number or General Records Schedule Authority.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

Disposition pending. Retain indefinitely until the retention and disposition is approved by NARA (National Archives and Records Administration).

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.  
(2) If a SORN does not apply, 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) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, 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 must be identified.

AUTHORITY: OMB Policy M-16-12: Improving the Acquisition and Management of Common Information Technology. Executive Order 13781 (Comprehensive Plan for Reorganizing the Executive Branch), USC Title 10§2222, Executive Order 14028 (Improving the Nation's Cybersecurity), 10 U.S.C. Chapter 107, Professional Military Education; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 5 U.S.C. Chapter 41, Training; 10 U.S.C. 115b Biennial Strategic Workforce Plan; 51400.25 Volume 250, DoD Civilian Personnel Management System; CFR part 410, Office of Personnel Management-Training; E.O. 11348, Providing for the Further Training of Government Employees, as amended by E.O. 12107, Relating to the Civil Service Commission and Labor-Management in the Federal Service; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; DoD Directive 1

**n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (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      ☒ No      ☐ Pending

(1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.

(2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, " DoD Information Collections Manual: Procedures for DoD Public Information Collections."

(3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

This system does not collect information on members of the public, only Service members.