

## 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:

Department of Defense Memorandum of Understanding (DoD MOU) Application

### 2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

### 3. PIA APPROVAL DATE:

08/09/24

Defense Support Services Center (DSSC)

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

**a. The PII is:** (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- ☐ From members of the general public ☐ From Federal employees
- ☒ from both members of the general public and Federal employees ☐ 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 DoDMOU facilitates educational institution compliance with DoD policy for the Tuition Assistance (TA) program which requires a signed MOU prior to receiving Service funding.

**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)

Verification and identification. Publicly available data is collected from users of the DoDMOU system to provide access to the system. College/University personnel who interact with the DoDMOU system provide names, professional email address and work phone numbers as points of contact for each educational institution. This is publically available information available from public websites. Once collected, it is used to identify users of the system.

**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.

To effectively communicate with the Points of Contact (POC) at the institutions we need to collect at the bare minimum their office phone number and official institution email address which are both available on their institution webpage. Policy updates and other essential MOU procedures are communicated via System generated emails. Providing the information is voluntary.

**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.

Individuals are provided with a Privacy Act Statement outlining the specific uses of the information collected.

**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

Department of Defense Memorandum of Understanding (DoD MOU) Application

Authority: DoDI 1322.25, Voluntary Education Program; DoDD 1322.08E, Voluntary Education Programs for Military Personnel; and E.O.9397 (SSN), as amended.

**Principal Purpose(s):** To process memorandum of understanding applications and verify educational institution information provided is accurate and meets the DoDI 1322.25 eligibility requirements to participate in the military Tuition Assistance program.

**Routine Use(s):** To contractors responsible for performing or working on contracts for the DoD when necessary to accomplish an agency function related to this system of records. For a complete list of routine uses, visit the applicable system of records notice at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

**Disclosure:** Voluntary; however, failure to provide the requested information may result in a delay of processing and/or eligibility approval to participate in the military tuition assistance program.

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

- |  |          |  |
|--|----------|--|
| <input type="checkbox"/> Within the DoD Component  | Specify. | <input type="text"/>                   |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. | <input type="text"/>                   |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)  | Specify. | <input type="text"/>                   |
| <input type="checkbox"/> State and Local Agencies  | Specify. | <input type="text"/>                   |
| <input type="checkbox"/> 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. | <input type="text"/>                   |
| <input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).  | Specify. | Universities, Educational Institutions |

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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Individuals            | <input type="checkbox"/> Databases          |
| <input type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems |   |

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

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

DoD MOU online form

**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.

DAA-GRS-2017-0002-0002

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

(3) Retention Instructions.

Delete when superseded, obsolete, or when customer requests the agency to remove the records.

**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.

DoDI 1322.25, Voluntary Education Program; DoDD 1322.08E, Voluntary Education Programs for Military Personnel

**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 DoD Memorandum of Understanding Application is to facilitate educational institution compliance with DoD policy for the Tuition Assistance (TA) program which requires a signed MOU prior to receiving Service funding.