

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:

Employer Support of the Guard and Reserve Public Website (www.esgr.mil)

2. DOD COMPONENT NAME:

Defense Human Resources Activity

3. PIA APPROVAL DATE:

05/10/19

Defense Personnel and Family Support 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 purpose of the system is to support the Employer Support of the Guard and Reserve (ESGR) mission to: facilitate and promote a cooperative culture of employer support for National Guard and Reserve service by developing and advocating mutually beneficial initiatives; recognize outstanding employer support; increase awareness of applicable laws and policies; resolve potential conflicts between employers and their service members; and act as the employers' principal advocate within DoD. The PII contained in this system is used to create user accounts for a small subset of ESGR volunteers who handle public affairs, so that they are able to login to the website to contribute content (e.g., news and upcoming events) to the site.

The types of personal information stored in ESGR.mil include: volunteer member's full name, email address, and state.

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)

Identification

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.

Individuals may object to the collection of their PII by not providing their information to ESGR; however, failure to provide the requested information may impede, delay, or prevent further processing of user accounts.

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.

ESGR cannot create a State User account to log into the system without the collection of the requested information.

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

DD Form 2875 System Authorization Access Request (SAAR)

Authority: Executive Order 10450, 9397; and Public Law 99-474, the Computer Fraud and Abuse Act.

Principal Purpose: To record names, signatures, and other identifiers for the purpose of validating the trustworthiness of individuals requesting access to Department of Defense (DoD) systems and information. NOTE: Records may be maintained in both electronic and/or paper form.

Routine Uses: None.

Disclosure: Disclosure of this information is voluntary; however, failure to provide the requested information may impede, delay or prevent further processing of this request.

h. With whom will the PII be shared through data 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 | Specify. | <input type="text"/> |
| <input type="checkbox"/> Other Federal Agencies | 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 type="checkbox"/> Other (e.g., commercial providers, colleges). | Specify. | <input type="text"/> |

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 checked="" 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 type="checkbox"/> Information Sharing - System to System | <input type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

DD Form 2875

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://dpcid.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.

Information is not retrieved by name or other unique identifier.

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.

OSD AI-15, 1606-06.2

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

(3) Retention Instructions.

Temporary. Destroy after 210 days of inactivity or when user no longer requires access (i.e. user leaves ESGR, no longer holds a position/role requiring access to update the website).

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.

10 U.S.C. 1588, Authority to Accept Certain Voluntary Services; DoD Instruction 1205.22, Employer Support of the Guard and Reserve; DoD Instruction 8550.01, DoD Internet Services and Internet-Based Capabilities.

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.

Minimal information is collected.

SECTION 2: PII RISK REVIEW

a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- | | | |
|---|--|---|
| <input type="checkbox"/> Biometrics | <input type="checkbox"/> Birth Date | <input type="checkbox"/> Child Information |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Disability Information | <input type="checkbox"/> DoD ID Number |
| <input type="checkbox"/> Driver's License | <input type="checkbox"/> Education Information | <input type="checkbox"/> Emergency Contact |
| <input type="checkbox"/> Employment Information | <input type="checkbox"/> Financial Information | <input type="checkbox"/> Gender/Gender Identification |
| <input type="checkbox"/> Home/Cell Phone | <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Legal Status |
| <input type="checkbox"/> Mailing/Home Address | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Medical Information |
| <input type="checkbox"/> Military Records | <input type="checkbox"/> Mother's Middle/Maiden Name | <input checked="" type="checkbox"/> Name(s) |
| <input type="checkbox"/> Official Duty Address | <input type="checkbox"/> Official Duty Telephone Phone | <input type="checkbox"/> Other ID Number |
| <input type="checkbox"/> Passport Information | <input checked="" type="checkbox"/> Personal E-mail Address | <input type="checkbox"/> Photo |
| <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Position/Title | <input type="checkbox"/> Protected Health Information (PHI) ¹ |
| <input type="checkbox"/> Race/Ethnicity | <input type="checkbox"/> Rank/Grade | <input type="checkbox"/> Religious Preference |
| <input type="checkbox"/> Records | <input type="checkbox"/> Security Information | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input type="checkbox"/> Work E-mail Address | <input checked="" type="checkbox"/> If Other, enter the information in the box below | |

State

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?

If "No," explain.

- Yes No

b. What is the PII confidentiality impact level²? Low Moderate High

¹The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.

²Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

c. How will the PII be secured?

(1) Physical Controls. (Check all that apply)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Cipher Locks, | <input checked="" type="checkbox"/> Closed Circuit TV (CCTV) |
| <input checked="" type="checkbox"/> Combination Locks | <input checked="" type="checkbox"/> Identification Badges |
| <input checked="" type="checkbox"/> Key Cards | <input type="checkbox"/> Safes |
| <input checked="" type="checkbox"/> Security Guards | <input type="checkbox"/> If Other, enter the information in the box below |

(2) Administrative Controls. (Check all that apply)

- Backups Secured Off-site
- Encryption of Backups
- Methods to Ensure Only Authorized Personnel Access to PII
- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- If Other, enter the information in the box below

Use of visitor registers

(3) Technical Controls. (Check all that apply)

- | | | |
|---|--|--|
| <input type="checkbox"/> Biometrics | <input checked="" type="checkbox"/> Common Access Card (CAC) | <input checked="" type="checkbox"/> DoD Public Key Infrastructure Certificates |
| <input checked="" type="checkbox"/> Encryption of Data at Rest | <input type="checkbox"/> Encryption of Data in Transit | <input type="checkbox"/> External Certificate Authority Certificates |
| <input checked="" type="checkbox"/> Firewall | <input checked="" type="checkbox"/> Intrusion Detection System (IDS) | <input type="checkbox"/> Least Privilege Access |
| <input checked="" type="checkbox"/> Role-Based Access Controls | <input type="checkbox"/> Used Only for Privileged (Elevated Roles) | <input checked="" type="checkbox"/> User Identification and Password |
| <input checked="" type="checkbox"/> Virtual Private Network (VPN) | <input checked="" type="checkbox"/> If Other, enter the information in the box below | |

Password, Completely Automated Public Turing test to tell Computers and Humans Apart (CAPTCHA)

d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?

Proper safeguards at each stage in the information handling process are in place to minimize the improper handling and collection of PII. Access to personal information is maintained in a secure, password protected electronic system that utilizes security hardware and software. Physical controls, including the use of security guards, identification badges, key cards, cipher and combination locks, and closed circuit TV, are provided through DISA site hosting the data servers. DISA utilizes the above controls to ensure only authorized personnel have physical access to hardware supporting network operations. DISA and ESGR System Administrators audit access and security logs. Data backups are performed daily. Application administrators with access to PII are limited to personnel that require access for the performance of their duties. Additional controls include the use of firewalls, active intruder detection, role-based access controls, virtual private network, encryption, and passwords.