

## 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:**

Joint Advertising, Market Research and Studies  
Recruitment Database and Survey Database System (JAMRS)

**2. DOD COMPONENT NAME:**

Defense Human Resources Activity

**3. PIA APPROVAL DATE:**

01/09/18

Office of People Analytics (OPA)

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

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

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)   |

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

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" type="checkbox"/> Existing DoD Information System    | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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.**

Joint Advertising, Market Research & Studies (JAMRS) Recruiting Database:  
To compile, process and distribute files of individuals to the Services to assist them in their direct marketing recruiting efforts. The system also provides JAMRS with the ability to measure effectiveness of list purchases through ongoing analysis and to remove the names of individuals who are currently members of, or are enlisting in, the Armed Forces or who have asked that their names be removed from future recruitment lists. The types of personal information collected in the system include: All Records: Full name, gender, address, city, state, zip code and list source code. JAMRS based on list sources also collect on a limited basis: For young Adults aged 16 to 18; Date of birth, telephone number, high school name, graduation date, grade point average, education level, military interest, college intent, ethnicity, ASVAB test date, ASVAB Armed Forces Qualifying Test Qualifying Score. For College Students: telephone number, college name, college location, college type, college competitive ranking, class year, ethnicity, field of study. For Selective Service System: Date of birth, Department of Defense (DoD) ID Number, Selective Service registration method. Individuals who have responded to various paid/non-paid advertising campaigns seeking enlistment information: Date of birth, telephone number, Service Code, last grade completed, email address, contact immediately flag. For Military Personnel: Date of birth, DoD ID Number, ethnicity, education level, application date, military service and occupation information. For individuals who have asked to be removed from future recruitment list: Date of birth, reason code.

Joint Advertising, Market Research & Studies (JAMRS) Survey Database:  
To compile names of young adults aged 16 through maximum recruiting age to create a mailing frame from which to conduct surveys. These surveys will be conducted multiple times a year and each survey will be designed so that appropriate levels of precision can be achieved for inferences to be made at various geographic levels. The system also provides JAMRS with the ability to remove the names of individuals who are current/former members of, or are enlisting in, the Armed Forces and individuals who have asked to be removed from consideration as a participant in any future JAMRS survey.

Identifiable information across all sources will include name, gender, ethnicity (when available) address, city, state and zip. Prior service individuals who still have remaining Military Service Obligation; and records obtained from Selective Service System.

**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)

Data matching

**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.

JAMRS provides individuals with the opportunity to opt-out of the JAMRS databases. Individuals should address written inquiries to the Joint Advertising, Market Research and Studies (JAMRS), Direct Marketing Program Officer, Suite 06J25, 4800 Mark Center Drive, Alexandria, VA 22350-4000. Opt-out requests should contain the full name, date of birth, and current address of the individual."

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.

When responding to paid or non-paid advertising, it is understood the individual gives consent to forward their contact information to the Services to receive additional information. JAMRS provides individuals with the opportunity to opt-out of the JAMRS databases. Individuals should address written inquiries to the Joint Advertising, Market Research and Studies (JAMRS), Direct Marketing Program Officer, Suite 06J25, 4800 Mark Center Drive, Alexandria, VA 22350-4000. Opt-out requests should contain the full name, date of birth, and current address of the individual."

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

Authority: 110 U.S.C. 503(a), Enlistments: recruiting campaigns; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 8013, Secretary of the Air Force; and 14 U.S.C. 350, Coast Guard, as amended.

Principle Purposes: To compile, process and distribute files of individuals to the Services to assist them in their direct marketing recruiting efforts. The system also provides JAMRS with the ability to measure effectiveness of list purchases through ongoing analysis and to remove the names of individuals who are currently members of, or are enlisting in, the Armed Forces or who have asked that their names be removed from future recruitment lists.

Routine Use(s): In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

a. To contractors, grantees, experts, consultants, students, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for the federal government when necessary to accomplish an agency function related to this system of records.

b. To the appropriate Federal, State, local, territorial, tribal, foreign, or international law enforcement authority or other appropriate entity where a record, either alone or in conjunction with other information, indicates a violation or potential violation of law, whether criminal, civil, or regulatory in nature.

c. To any component of the Department of Justice for the purpose of representing the DoD, or its components, officers, employees, or members in pending or potential litigation to which the record is pertinent.

d. In an appropriate proceeding before a court, grand jury, or administrative or adjudicative body or official, when the DoD or other Agency representing the DoD determines that the records are relevant and necessary to the proceeding; or in an appropriate proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding.

e. To the National Archives and Records Administration for the purpose of records management inspections conducted under the authority of 44 U.S.C. §§ 2904 and 2906.

f. To a Member of Congress or staff acting upon the Member's behalf when the Member or staff requests the information on behalf of, and at the request of, the individual who is the subject of the record.

g. To appropriate agencies, entities, and persons when (1) the DoD suspects or has confirmed that there has been a breach of the system of records; (2) the DoD has determined that as a result of the suspected or confirmed breach there is a risk of harm to individuals, the DoD (including its information systems, programs, and operations), the Federal Government, or national security; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the DoD's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm.

h. To another Federal agency or Federal entity, when the DoD determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in (1) responding to a suspected or confirmed breach or (2) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs and operations), the Federal Government, or national security, resulting from a suspected or confirmed breach.

Disclosure: Voluntary; however, failure to disclose pertinent information may result in our inability to contact you with further information.

**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 checked="" type="checkbox"/> Within the DoD Component  | Specify. | JAMRS Program Manager, JAMRS Chief Joint Advertising, and the JAMRS Direct Marketing Project Officer.  |
| <input checked="" type="checkbox"/> Other DoD Components  | Specify. | Air Force, Air Force Reserve, Air National Guard, Air Force Academy, Army, Army National Guard, Army Academy/ ROTC, Army Reserve, Marine Corps, Marine Corps Reserve, Navy, Naval Academy, and Navy Reserve.   |
| <input checked="" type="checkbox"/> Other Federal Agencies  | Specify. | Coast Guard, Coast Guard Reserve, Coast Guard Academy  |
| <input type="checkbox"/> State and Local Agencies   | Specify. |  |
| <input checked="" 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. | The contract includes the Privacy Act clause of the Federal Acquisition Regulation (FAR), specifically FAR 52.224-2, under which the contractor/subcontractor agrees to comply with the requirements of the Privacy Act and DoD rules and regulations issued under the Act. This contract provision also treats the contractor/subcontractor as an employee of DoD for purposes of the Privacy Act, and is thus subject to possible criminal penalties if the Act is violated. The contract also incorporates FAR 52.239-1, Privacy and Security safeguards, which includes a notification requirement if new or unanticipated threats or hazards are discovered, or if existing safeguards cease to function. |
| <input type="checkbox"/> 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)**

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

Sources: Individual; Existing DoD information Systems Armed Services Vocational Aptitude Battery (ASVAB), U.S. Military Entrance Processing Command (MEPCOM), and DMDC; other Federal Systems (Selective Service System); State Departments of Motor Vehicles (DMVs); and Commercial List Vendors

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

State Departments of Motor Vehicles (DMVs) and Commercial List Vendors

**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://dpcltd.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.

**I. 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-0330-2014-0008 (Recruiting) and DAA-0330-2014-0009 (Survey).

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

(3) Retention Instructions.

Destroy three years from the date the information pertaining to the individual is first distributed to the Services or, where data are subsequently collected from a different data source, from the date that subsequent data are subsequently distributed to the Services.

Records for individuals who have responded to various paid/nonpaid advertising campaigns seeking enlistment are kept, for analytical purposes, until they are no longer needed.

Records for individuals who wish to be removed from future recruitment lists (opted-out) are retained for ten years.

**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 for maintenance of the system (DHRA 04) :

10 United States Code (U.S.C.) 503(a), Enlistments: recruiting campaigns; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013 (Secretary of the Army); 10 U.S.C. 5013 (Secretary of the Navy); 10 U.S.C. 8013 (Secretary of the Air Force); 14 U.S.C. (United States Coast Guard) 350.

Authority for maintenance of the system (DHRA 05) :

10 United States Code (U.S.C.) 503(a), Enlistments: recruiting campaigns; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013 (Secretary of the Army); 10 U.S.C. 5013 (Secretary of the Navy); 10 U.S.C. 8013 (Secretary of the Air Force); 14 U.S.C. (United States Coast Guard) 350, Research and development projects.

**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.

JAMRS is exempt from OMB approval in accordance with 10 U.S.C. 503(a) (Subchapter I of chapter 35 of title 44 shall not apply).