

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 (JAMRS) Recruitment and Survey Database System (JAMRS 2.0)

2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

3. PIA APPROVAL DATE:

Defense Personnel Analytics Center (DPAC); Joint Advertising, Market Research and Studies (JAMRS)

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.

To compile, process, and distribute files of individuals, ages 16 to 18 years, to the Services to assist them in their direct marketing recruiting efforts, and to compile names of young adults aged 16 through maximum recruiting age to create a mailing frame from which to conduct surveys. 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, as well as those who have asked that their names be removed from future recruitment lists or consideration as a participant in any future JAMRS survey. 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.

All records: Full name, sex, address, city, state, zip code, source code.

For all survey participants: Date of birth, ethnicity, Armed Services Vocational Aptitude Battery (ASVAB) test results

For individuals aged 16 to 18 years: Date of birth, telephone number, high school name, graduation date, grade point average, education level, military interest, college intent, ethnicity, Armed Services Vocational Aptitude Battery (ASVAB) test date, and ASVAB Armed Forces Qualifying Test Category Score.

For college students: telephone number, college name, college location, college type, college competitive ranking, class year, ethnicity, and field of study.

For Selective Service System: Date of birth and 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, e-mail address, and contact immediately flag.

For military personnel: Date of birth, Electronic Data Interchange Personal Identifier/Department of Defense (DoD) Identification 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 and reason code.

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 and mission-related use

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 request to opt out of the database by sending their name, address, and date of birth to JAMRS for suppression of their information.

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.

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

For recruiting:

Authority: 10 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, ages 16 to 18 years, 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.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 522a(b) of the Privacy Act of 1974, as amended. To the Department of Homeland Security to support the development of advertising and market research targeted at prospective United States Coast Guard recruits.

Additional routine uses are listed in the applicable System of Records Notice, Joint Advertising, Market Research & Studies Recruiting Database, DHRA 04 at: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

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

For surveys:

Authority: 10 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 names of individuals aged 16 through maximum recruiting age to create a mailing frame from which to conduct surveys.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 522a(b) of the Privacy Act of 1974, as amended. To the Department of Homeland Security to support the development of advertising and market research targeted at prospective United States Coast Guard recruits. Additional routine uses are listed in the applicable System of Records Notice, Joint Advertising, Market Research & Studies Survey Database, DHRA 05 at: <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

DISCLOSURE: Voluntary. However, maximum participation is encouraged so that the data collected will be complete and representative.

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)

☐ Within the DoD Component

Specify.

☒ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

☒ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

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.)

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, Navy Reserve, and Space Force.
Coast Guard, Coast Guard Reserve, Coast Guard Academy
Amazon Web Services (AWS), MullenLowe, Fors Marsh Group (FMG), and Merkle.
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

Specify.

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.

☐ 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 | |

Armed Services Vocational Aptitude Battery (ASVAB), Defense Enrollment Eligibility Reporting Systems (DEERS), and Defense Manpower Data Center Data Base; other Federal Systems (Selective Service System); State Departments of Motor Vehicles (DMVs) Systems; and Commercial List Vendors (MDR, ASL Marketing, and the National Research Center for College and University Admissions)

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"/> In-Person 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 via SFTP transfer

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.

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.

Joint Advertising, Market Research & Studies (JAMRS) Recruiting Database - Commercial Vendor High School and College File
Commercial Sources: Temporary. Cut off when one year old, based on mailing usage data. Destroy 3 years after cutoff.

Joint Advertising, Market Research & Studies (JAMRS) Recruiting Database – DMV, ASVAB and Selective Service (SSS) Source records:

Temporary. Cut off when list is released to the Services, based on mailing usage data. Destroy 3 years after cutoff.

Joint Advertising, Market Research & Studies (JAMRS) Recruiting Database – Opt-Outs (aka JAMRS Suppression File): Temporary. Cut off when the name is added to the JAMRS Suppression File. Destroy 10 years after cutoff.

Joint Advertising, Market Research & Studies (JAMRS) Recruiting Database – Contact Lists: Temporary. Cut off after the list has been created. Destroy 1 year after cutoff.

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. 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. 350, Coast Guard; and 10 U.S.C. 2358, 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).