

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:

Survey Analytical Platform (SAP)

2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

3. PIA APPROVAL DATE:

Office of People Analytics (OPA)

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 acquire, integrate, and securely store data for DoD-approved analysis projects. OPA staff members conduct data analysis of attitude and opinion survey data that are often merged with administrative record data to assess analytical outcomes like retention, separation, promotion and demotions. OPA uses the Survey Analytical Platform (SAP) in both, internal and external research analysis studies and surveys to better understand how characteristics of individual factors interact with policy and environment factors to influence the performance and composition of the DoD workforce and community. Through these studies and surveys, OPA will at a minimum, inform on questions pertaining to recruiting, hiring, retention, readiness, succession planning, training, and increased talent-based assignment matching through the Department.

Additionally, SAP also provides a secure, virtual workspace where approved OPA researchers and analysts can access unclassified DoD military service and DoD community administrative data. All SAP users must be affiliated with a government entity via a government sponsored project or contract before conducting work in the analytical platform, and are vetted by OPA personnel before gaining access to requested data sets within SAP. While DoD's Administrative and Survey Data receive regular data feeds from external sources, SAP is primarily an analytical platform which has very few data assets that contain PII. The datasets with PII are generally administrative datasets and the PII is only used to create linking files to combine multiple datasets together for a very specific purpose that has been approved by an Institutional Review Board (IRB) and data sharing agreements. The only exception is the DoD ID will be included on all Defense Equal Opportunity Climate Surveys (DEOCS) which allows OPA to produce higher aggregations of DEOCS weighting and estimation, once approved by the IRB.

The categories of records include: full name, home/cell phone, mailing/home address, work e-mail address, race/ethnicity, sex, birth date, citizenship, education information, military records, employment information, security information, position/title, rank/grade, security information, marital status, dependent data, DoD ID number, other ID number (Survey ID), and SSN.

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 information is collected in SAP for the purpose of conducting matching between data sets prior to de-identification and release in the system for analysis purposes.

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.

The individual does not have the ability to object to the collection of their data in SAP, since this system is not the initial point of collection.

The individual would have to opt out at the source system for their PII data not to be collected by SAP.

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.

The individual does not control the specific use of the PII data once collected into the SAP. All data within SAP is initially captured in other systems of record.

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

SAP does not directly collect PII from individual users.

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

DMDC 01, DMDC DB; DMDC 02, DEERS; DMDC 04, NTS/ETAS; DMDC 05, JDAMIS; DMDC 07, DIBRS; DMDC 08, Surveys; DMDC 10, DBIDS; DMDC 11, Investigative Records Repository; DMDC 12, JPAS; DMDC 13. DCII; DMDC 15, ASVAB; DMDC 16, IMESA; DMDC 17, Continuous Evaluation Records for Personnel Security; DMDC 18, SPOT-ES; DMDC 19, SWFT; DMDC 22, DCAT; DMDC 23, IRCMS; DMDC 24, DISS; DMDC 27, DIUCS; EDHA 07, MHIS; EDHA 08, DHA Survey and Study DB; EDHA 20, (DoDSER to include ancestor Army Suicide Event Report ASER); DHRA 01, PERSEREC Espionage DB; DHRA 02, PERSEREC Research Files; DHRA 05, JAMRS Survey DB; DHRA 06, DSAID; N06500-1 MILCO; A0600-8-1c AHRX DoD (DCIPS); A0601-270 US MEPCOM (USMIRS); DSPO Suicide Data Repository(SDR)/Military Mortality Database(MMDB); PERSTEMPO (N01080-1 and N01080-2); DUSDI 01 (DITMAC); Tailored Adaptive Personality Assessment System (TAPAS); Enterprise Monitoring and Management of Accounts (EMMA and Security Online); DPR 48, DEOMI

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 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 type="checkbox"/> Other (If Other, enter the information in the box below) | |

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://dpclld.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.

This not the initial point of collection. Data is covered under various existing SORNs (see sources)

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.

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

(3) Retention Instructions.

Temporary. Cutoff annually on completion of research project. Destroy 5 years 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. 136, Under Secretary of Defense for Personnel and Readiness; 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.

This not the initial point of collection.