

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:

DoD Safe Helpline

2. DOD COMPONENT NAME:

Under Secretary of Defense for Personnel and Readiness

3. PIA APPROVAL DATE:

11/29/2017

Sexual Assault Prevention and Response Office (SAPRO)

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.

The purpose of the DoD Safe Helpline (SHL) is to provide anonymous one-on-one support and information to victims of sexual assault under the jurisdiction of the military Services worldwide. The system also serves as a tool to track and respond to requests for SHL marketing and promotional material. The Rape, Abuse & Incest National Network (RAINN) operates the SHL under contract to the DoD. To ensure the integrity of SHL services, PII is only collected within the following SHL subcomponents:

- **Material Requests (DD Form 2985-2)** - Available on safehelpline.org, the voluntary Material Request Form (DD Form 2985-2) is used to request SHL marketing and promotional materials, such as brochures, coffee sleeves, and posters. The information collected includes: first and last name, shipping address, personal or work email, installation/base, rank (if applicable), status/position (e.g., Sexual Assault Response Coordinator (SARC), victim advocate, third party organization, etc.), affiliation (e.g. Service, family member, veteran, etc.), and an open comment field for questions and suggestions. Users have the option to create an account with their email and a user-selected password to place recurring orders and track the status of their current order.

- **Military Feedback (DD Form 2985-1)**- Available on safehelpline.org, the voluntary Military Feedback Form(DD Form 2985-1) enables individuals to leave comments, compliments, or complaints about the services of a SARC, victim advocate, or other military staff or personnel on their installation/base. Information provided on this form is forwarded to DoD SAPRO and maintained in the Victim-Related Inquiries system of record. Information collected includes: first and last name, user type (e.g. victim/survivor, family friend, etc.), Service affiliation, status/position (e.g., Service member, military spouse, DoD civilian employee, etc.), installation where the interaction took place, date of incident, the name and/or office and title of the military personnel about which the feedback is being submitted, and an open comment field which states, "If you have a complaint, or a compliment, about the service you received, please be as specific as possible." The form may also be submitted anonymously. Individuals may also simply leave their contact information (email, address, phone number) and request SAPRO contact them.

- **Responder Administrative Database** - A searchable referrals database that houses contact information for SARCs, medical, legal, chaplain, and military police resources, as well as information for civilian sexual assault service providers. The database maintains: name and work-related contact information (installation/base, address, email, phone number) for each responder. Information regarding resources listed in the database may only be retrieved by authorized Safe Helpline users (i.e., appointed Service Sexual Assault Prevention and National Guard Bureau POCs) and staff by searching by name of a base, installation, state, or zip code. Information for military service providers are provided and maintained by Service SAPR and National Guard Bureau POCs. Civilian providers are vetted and their information maintained by RAINN.

- **Follow-up Support Services (FSS) Database** - The Follow-up Support Services Database maintains information regarding referrals discussed during an individual's call to the SHL in order to help address ongoing issues or difficulties and ensure that quality care continues

when there are changes in program management/staff. Name or pseudonym, phone number, rank, base, state, and age may be required and maintained in the database in order to offer support services to individuals who have not reported their assaults to a military authority. Collecting these data fields ensures that any individual opting to receive follow-up support services from a SHL staff member can get support in a way that is most convenient for them.

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; Mission-related use; administrative 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.

Voluntary, however, failure to provide information may limit SHL's ability to provide requested services.

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 requesting SHL services cannot give or withhold their consent to specific uses of their PII. The information collected is used only for those limited purposes which are required in order for services to be provided.

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 2895-1

Privacy Act Statement

Authority: 10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR Program); DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures.

Principal Purpose(s): To track victim-related inquiries received by the Sexual Assault Prevention and Response Office (SAPRO) via e-mail, SAPR.mil, the DoD Safe Helpline, phone, or postal service. Once received, inquiries are referred to the appropriate agency POC and/or to the DoD IG in order to address the issue(s) raised and facilitate a resolution. To allow individuals to provide feedback on the services of a SARC, victim advocate, or other military staff or personnel on their installation/base. This form does not constitute a report of sexual assault.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. Routine uses may be found in the applicable system of records notice, DHRA 18 DoD, DoD Sexual Assault Prevention and Response Office Victim Assistance Data Systems at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

Disclosure: Voluntary; however, failure to provide information may result in the inability to provide requested services.

DD Form 2985-2

Privacy Act Statement

Authority: 10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR Program); and DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures.

Principal Purpose(s): To provide for requests for Safe Helpline marketing and promotional materials.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. To SAPRO's printing vendor to ship marketing and promotional materials requested via SHL.

Additional routine uses may be found in the applicable system of records notice DHRA 18 DoD, DoD Sexual Assault Prevention and Response Office Victim Assistance Data Systems at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

Disclosure: Voluntary; however, failure to provide information may result in the inability to provide requested services.

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

Within the DoD Component Specify.

Other DoD Components Specify.

<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 checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).	Specify.	Printing Vendor (Nonprofit Business Service)

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	

Individual; appointed Service SAPR and National Guard Bureau POCs; RAINN Local Counseling Center Database

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 checked="" type="checkbox"/> Paper
<input type="checkbox"/> Fax	<input checked="" type="checkbox"/> Telephone Interview
<input checked="" 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)	

DD Forms 2985-1 and 2985-2

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.

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

(3) Retention Instructions.

Military Feedback: Temporary, Cut off resolved cases files at end of calendar year. Destroy 25 year(s) after cut off. (DAA-0330-2016-0005)
 Material Requests: Temporary, Cut off completed/canceled request for material at the end of the fiscal year. Destroy 3 months after cut off. (OSD/RDS 101-22)
 Responder Database: Temporary, Cut off obsolete/revised records at the end of the fiscal year. Destroy 1 year after cutoff. (GRS 16, Item 14e, NI-GRS-98-2 item 23)
 Follow-up Support System: Temporary, Cut off at the end of fiscal year of close-out of communication. Destroy 25 year(s) after close-out of communication. (DAA-0330-2016-0004)

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. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR) Program; DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures.

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.

OMB Number 0704-0565, "DoD Sexual Assault Prevention and Response Office Victim-Related Inquiries," Expiration: 7/31/2019