

## 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:**

Defense Sexual Assault Advocate Certification Program

**2. DOD COMPONENT NAME:**

Defense Human Resources Activity

**3. PIA APPROVAL DATE:**

10/31/2018

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 checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input 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.**

To track the certification of SARC and SAPR VAs. Information will be used to review, process, and report on the status of SARC and SAPR VA certification to Congress.

**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 and verification.

**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.

SARCs and SAPR VAs may object to the collection of their PII by not submitting their PII on the required forms. However, they may not be considered qualified to perform their duties as a SARC and SAPR VA if they do not submit the information required to become certified.

**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.

Applicants cannot give or withhold their consent to specific uses of their PII. The PII will be used in very limited ways, including to process and grant certification and communicate to the applicants and the DoD on certification statuses.

**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.)

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory | <input type="checkbox"/> Not Applicable |
|---|---|---|

DD Form 2950, Department of Defense Sexual Assault Advocate Certification Program New Application Packet and DD Form 2950-1, Department of Defense Sexual Assault Advocate Certification Program Renewal Application Packet, includes a Privacy Act Statement on the first page as follows:

Authority: 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; DoD Instruction 6495.03, Defense Sexual Assault Advocate Certification Program (D-SAACP).

Principal Purpose(s): To review and process applications for Sexual Assault Response Coordinator (SARC) and Sexual Assault Prevention Representative (SAPR) Victim Advocate (VA) certification.

Routine Use(s): To the Department of Justice, Justice Programs, Office for Victims of Crime, for the purpose of verifying certified Sexual Assault Response Coordinators (SARCs) and SAPR Victim Advocates (VAs) for participation in Advance Military Sexual Assault Advocate Online Training. See the applicable system of records notice for other routine uses located at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570562/dhra-10-dod/>

DISCLOSURE: Voluntary. However, if you are a SARC or SAPR VA and do not complete this form to become certified, you may be disqualified from the position. 10 U.S.C. 1561, note requires DoD to establish a certification program.

**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. | Defense Manpower Data Center   |
| <input checked="" type="checkbox"/> Other DoD Components   | Specify. | Air Force, Army, Marine Corps, Navy, and National Guard                        |
| <input checked="" type="checkbox"/> Other Federal Agencies   | Specify. | Department of Justice-Office of Justice Programs, Office for Victims of Crimes |
| <input type="checkbox"/> State and Local Agencies  | Specify. |  |
| <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="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 type="checkbox"/> Databases          |
| <input type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems |   |

Individual, via DD Form 2950 and DD Form 2950-1

**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 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 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://dpcl.dod.mil/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.

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

(3) Retention Instructions.

**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.

**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.

**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 checked="" type="checkbox"/> Education Information                            | <input type="checkbox"/> Emergency Contact                                  |
| <input checked="" 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 checked="" type="checkbox"/> Official Duty Address  | <input checked="" type="checkbox"/> Official Duty Telephone Phone                    | <input type="checkbox"/> Other ID Number                                    |
| <input type="checkbox"/> Passport Information              | <input type="checkbox"/> Personal E-mail Address                                     | <input type="checkbox"/> Photo  |
| <input type="checkbox"/> Place of Birth                    | <input checked="" type="checkbox"/> Position/Title                                   | <input type="checkbox"/> Protected Health Information (PHI) <sup>1</sup>    |
| <input type="checkbox"/> Race/Ethnicity                    | <input checked="" 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 checked="" type="checkbox"/> Work E-mail Address    | <input checked="" type="checkbox"/> If Other, enter the information in the box below |   |

Position type (DoD personnel); Service/DoD affiliation and status; grade/rank; installation/command; work email address and telephone number; official military address of applicant and applicant's SARC (commanding officer, street, city, state, ZIP code, country); position level (Level I, II, III, or IV); certificates of training; date of application; verification of sexual assault victim advocacy experience (position, dates, hours, supervisor; name, title, and work telephone number of verifier); evaluation of sexual assault victim experience (description of applicant skills, abilities, and experience; name, title, and office of evaluator), letters of recommendation by the first person in the chain of command, SARC, and the Senior Commander or the Commander; supervisor and commander statement of understanding, documentation of continuing education training courses; Defense Sexual Assault Advocate Certification Program (D-SAACP) identification (ID) number.

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 level<sup>2</sup>?**

- Low     Moderate     High