

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:

Regional Center Persons Activity Management System (RCPAMS) - SC GovCloud

2. DOD COMPONENT NAME:

Defense Security Cooperation Agency

3. PIA APPROVAL DATE:

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

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

- ☐ From members of the general public ☐ From Federal employees and/or Federal contractors
- ☒ From both members of the general public and Federal employees and/or Federal contractors ☐ 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.

The purpose of the Regional Center Persons Activity Management System (RCPAMS) is to provide: (1) a solution for Regional Center staff to manage operational, logistical and cost details about people, events, enrollments and organizations; (2) a tool for reporting on all data related to Regional Center events; (3) a platform for sharing common processes, technology and data elements to facilitate efficient communication between the Regional Centers; (4) a single view of each person with whom any of the Regional Centers have a relationship, representing the current snapshot and historical record of events and biographical information; (5) an interface to other systems with which the Regional Centers must exchange data for use by other users and organizations; and (6) an enterprise-class Customer Relationship Management platform to manage two-way communication between SAN and RCPAMS related to events and their participants.

The types of PII in this system is a follows: Name, citizenship, gender, date and place of birth, work and personal email addresses, work and home addresses, work and home telephone numbers, cell phone numbers, spouse name, marital status, full face photograph and other physical descriptions, education, employment and military information, emergency contact, visa numbers, control numbers and language capabilities.

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)

The PII is collected to manage student activities, events and courses. In addition, some of the PII is used for identification purposes for access to DoD information and military facilities. Access to the PII data is limited to authorized personnel only. The use of a Department of Defense Common Access Card (CAC) is required for authentication and access to the system data.

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.

Employees implicitly consent to the capture and use of their PII at the time of employment. Upon the collection of personal information, the Personnel office provides the employee with appropriate Privacy Act Statements and provides an opportunity to object to any collection of PII at that time. Regarding students, participation in military training opportunities and seminars at the Regional Centers is voluntary. However, failure to provide the information may result in ineligibility.

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.

Employees and students implicitly consent to the capture and use of their PII at the time of employment and enrollment in the training programs. However, students are given an opportunity through a written release form to authorize or restrict the sharing of their contact information to alumni for networking purposes.

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

PRIVACY ACT STATEMENT

Authority: This information is being collected under the authority of 10 U.S.C. 134, Under Secretary of Defense for Policy; 22 U.S.C. 39, Arms Export Control Act, Chapters 32 and Chapter 39; DoD Directive (DoDD) 5105.65, Defense Security Cooperation Agency (DSCA); DoDD 5101.1, DoD Executive Agent; DoDD 5132.03, DoD Policy and Responsibilities Relating to Security Cooperation; Army Regulation 12-15, Secretary of the Navy Instruction 4950.4B; Air Force Instruction 16-105, Joint Security Cooperation Education and Training; and DSCA Manual 5105.38-M, Security Assistance Management Manual (SAMM), Chapter 10, International Training.

Principal Purposes: The primary purpose of the information collected is to improve management of education opportunities in security cooperation as provided by the Department of Defense through the standardization of business processes across the five Regional Centers for Security Studies.

Routine Use(s): The information will be used as set forth above and in accordance with the routine use categories listed in OSD Privacy Act System Notice DSCA-03, Regional Center Persons Activity Management System (RCPAMS).

Disclosure: Providing the personal information is voluntary. However, failure to provide the requested information may result in ineligibility of certain program opportunities and prevent access to US installation.

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.

DSCA Headquarters, Office of Secretary of Defense (OSD); Africa Center for Strategic Studies (ACSS); Daniel K. Inouye Asia-Pacific Center for Securities Studies (APCSS); George C. Marshall European Center for Securities Studies (GCMC); Near-East-South Asia Center for Strategic Studies (NESA); and William J. Perry Center for Hemispheric Defense Studies (CHDS)

☐ Other DoD Components

Specify.

☐ Other Federal Agencies

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.)

Specify.

Name: DKW Communications, Inc.

The contracts contain provisions to ensure the confidentiality and security of PII are in place to to manage PII in the workplace, including language addressing the completion of initial and annual privacy training for contractor employees. See Privacy Clauses 52.224-1, 52-224-2 and 52-224-3.

☐ 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)

☒ Individuals

☒ Databases

☒ Existing DoD Information Systems

☐ Commercial Systems

☐ Other Federal Information Systems

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

☒ E-mail

☐ Official Form (Enter Form Number(s) in the box below)

☐ Face-to-Face Contact

☐ Paper

☐ Fax

☐ Telephone Interview

☒ Information Sharing - System to System

☐ Website/E-Form

☐ 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

DSCA-03

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.

See Below

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

(3) Retention Instructions.

Disposition: Temporary. Cut off on closure of study or event annually. Destroy 25 years after cutoff.

Authority: DAA-0330-2013-0003-0001

File Number: 810-07

File Title: Regional Center Personnel Activity Management System (RCPAMS) Master File

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. 134, Under Secretary of Defense for Policy; DoD Directive 5105.65, Defense Security Cooperation Agency (DSCA); DoD Directive 5101.1, DoD Executive Agent; DoD Directive 5200.41, DoD Regional Centers for Security Studies; and DoD Directive 5132.03, DoD Policy and Responsibilities Relating to Security Cooperation

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.

RCPAMS collection is covered under OMB 0704-0555; Expiration Date: June 30, 2022.