

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:

Marshall Center Network (MCNET)

2. DOD COMPONENT NAME:

Defense Security Cooperation Agency

3. PIA APPROVAL DATE:

George C. Marshall European Center for Security Studies (GCMC)

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 Marshall Center Network (MCNET) is a general support system that provides network and telecommunication infrastructure to support daily business operations at the GCMC in support of its partnership building mission which include, but not limited, to the following program services: Human Resources, Finance, Travel, Participant Affairs, Legal, Student Registrar, and Academic Instruction.

The information processed consists of staff work product and administrative data which by its nature also includes the use of various non-sensitive and sensitive personally identifiable information (PII).

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 intended use of the information collected is for mission-related and administrative uses as specified above. In addition, the PII is collected to manage various personnel actions to include the validation and reconciliation of travel orders, including the management of student/participant activities, events and courses, including certain PII that is used for identification purposes for access to DoD information and military installation.

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 for various personnel actions (e.g., Human Resources, training, security and travel, etc.) . Upon the collection of personal information, employees are provided appropriate Privacy Act Statements and given an opportunity to object to any collection of PII at that time.

Regarding members of the general public, participation in the international military education and training courses and opportunities at the GCMC is voluntary, and individuals may object to the collection of their PII upon request of the information. However, failure to provide the requested information may result in ineligibility of the training program opportunities and prevent access to US installation.

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 other participants implicitly consent to the capture and use of their PII at the time of employment and participation in specific training program courses and opportunities, respectively.

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

Upon the collection of personal information, individuals subject to the Privacy Act are provided appropriate Privacy Act Statements. For access to MCNET, DD Form 2875, System Authorization Access Request (SAAR) is completed, and the form includes the following Privacy Act Statement:

Authority: Executive Order 10450, 9397; and Public Law 99-474, the Computer Fraud and Abuse Act.

Purpose: To record names, signatures, and other identifiers for the purpose of validating the trustworthiness of individuals requesting access to Department of Defense (DoD) systems and information. NOTE: Records may be maintained in both electronic and/or paper form.

Routine Use: None.

Disclosure: Disclosure of this information is voluntary; however, failure to provide the requested information may impede, delay or prevent further processing of this request.

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 and Regional Centers and Fields Activities

Other DoD Components

Specify.

U.S. Army Garrison (Benelux, Stuttgart & Bavaria, Garmisch), DAI, DFAS and DTS

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.

CSRA Inc. - The contract contains 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. Note, FAR Privacy Act clauses have been added to the contract.

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)

- | | |
|---|---|
| <input checked="" type="checkbox"/> E-mail | <input checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> Face-to-Face 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 type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

DD Form 2875, DD Form 1610, DA Form 31, DA Form 4187, DD Form 1351-2, AE Form 600-77A, SF Form 182, and DD Form 577

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.

Because the MCNET is not a system of records for purposes of the Privacy Act, a SORN is not required to be published in the Federal Register.

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.

OSD Records Manager advised that MCNET is not a single purpose system, and a records disposition is not required.

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); DSCA Security Assistance Management Manual, Chapter 10, International Training; DoD Directive 5132.03, DoD Policy and Responsibilities Relating to Security Cooperation; Army Regulation 12-15, SECNAVINST 4950.4B, AFI 16-105, Joint Security Cooperation Education and Training ; Public Law 97-195, Foreign Assistance and Arms Export Act of 1961, as amended; E.O. 9397 (SSN), as amended; and E.O. 10450.

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.

The Marshall Center Network (MCNET) is not subject to the Paperwork Reduction Act (PRA) requirement and OMB approval because it is a "storage" media and a local area network (LAN) that links/groups computers with other computers within GCMC. As such, a LAN does not collect information directly from the public. However, personnel with the GCMC Registrar Office coordinates the collection of information from 10 or more members of the public that is stored in paper format and/or MCNET via the Regional Center Persons/Activity Management System (RCPAMS). RCPAMS is currently operating under OMB approval - 201603-0704-005, and an update to its current OMB approval is forthcoming.

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