

## **PRIVACY IMPACT ASSESSMENT (PIA)**

## For the

Learning Management System (LMS)

Defense Threat Reduction Agency

## SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel\* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

### SECTION 2: PIA SUMMARY INFORMATION

### a. Why is this PIA being created or updated? Choose one:

|             | New DoD Information System                       |    | New Electronic Collection      |
|-------------|--|----|--------------------------------|
| $\boxtimes$ | Existing DoD Information System                  |    | Existing Electronic Collection |
|             | Significantly Modified DoD Information<br>System | on |                                |

# b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

| $\boxtimes$ | Yes, DITPR   | Enter DITPR System Identification Number | 8672 |
|-------------|--------------|--|------|
|             | Yes, SIPRNET | Enter SIPRNET Identification Number      |      |
|             | No           |  |      |

# c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

| ⊠ Yes               | □ No                    |
|---------------------|-------------------------|
| If "Yes," enter UPI | 007-97-01-03-02-2774-00 |

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

# d. 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 <u>retrieved</u> by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

| $\times$ | Yes |
|----------|-----|
|----------|-----|

No

If "Yes," enter Privacy Act SORN Identifier

HDTRA 022

DoD Component-assigned designator, not the Federal Register number. Consult the Component Privacy Office for additional information or access DoD Privacy Act SORNs at: http://www.defenselink.mil/privacy/notices/

or

#### Date of submission for approval to Defense Privacy Office Consult the Component Privacy Office for this date.

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#### e. Does this DoD information system or electronic collection have an 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                      |  |
|--------------------------|--|
| Enter OMB Control Number |  |
| Enter Expiration Date    |  |

🖂 No

# f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

5 U.S.C. Chapter 41, the Government Employees Training Act
10 U.S.C. 1701 et seq., Defense Acquisition Workforce Improvement Act
E.O. 11348, Providing for the further training of Government employees, as amended by E.O. 12107, Relating to the Civil Service Commission and labor-management in the Federal Service
5 CFR part 410, Office of Personnel Management-Training.

# g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

Information is used to manage and administer training and development programs; to identify individual training needs; to screen and select candidates for training; and for reporting, forecasting, tracking, monitoring, and assessment purposes. Statistical data, with all personal identifiers removed, are used to compare training completion data among different DTRA activities. Personal information includes name, occupational series, grade, supervisory status, registration, student development curricula, training data, and may include proficiency data in one or more skill areas. Access via the DTRA Local Area Network may add computer logon information.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Potential mishandling of privacy information is low. DTRA has a mandatory requirement, tracked by the LMS itself, for all individuals to complete Privacy Act Training. System access is monitored by system administrators and routinely checked for requirements of access. All users of the system are required to justify their access via their supervisor.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify. Training management staff and supervisors.

#### Other DoD Components.

|             | Specify.                  | Educational, training, and conferencing entities   |  |
|-------------|---------------------------|--|--|
| $\boxtimes$ | Other Federal Agencies.   |  |  |
|             | Specify.                  | DVA, DOL   |  |
| $\boxtimes$ | State and Local Agencies. |  |  |
|             | Specify.                  | Agencies with a requirement to track, manage and report on mandatory training requirements and certifications. |  |
|             | Contractor                | (Enter name and describe the language in the contract that safeguards PII.)                                    |  |
|             | Specify.                  |  |  |
| $\boxtimes$ | Other (e.g.,              | commercial providers, colleges).   |  |
|             | Specify.                  | Public and private sector educational, training, and conferencing entities                                     |  |

### i. Do individuals have the opportunity to object to the collection of their PII?

| $\times$ | Yes |  | No |
|----------|-----|--|----|
|----------|-----|--|----|

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Individuals can object to the collection of information in identifiable form about themselves before completing the appropriate DTRA LMS New Student Data form. Online submittal of this form indicates consent. Information on individuals' training completion is automatically updated for internal on-line courseware, obtained from the class roster for internal instructor-led courses, and voluntarily reported to training coordinators for external training. Failure to provide the PII may result in the individual not receiving or being credited for training.

(2) If "No," state the reason why individuals cannot object.

### j. 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.

This is a single purpose system for management of the training and professional qualifications of agency personnel, including contractors when applicable. This includes training that is mandatory as a condition of employment.

**k. What information is provided to an individual when asked to provide PII data?** Indicate all that apply.

| $\boxtimes$                    | Priva | cy Act Statement 🛛 Privacy Advisory   |
|--------------------------------|-------|---|
|                                | Othe  | r 🗌 None  |
| Desc<br>each<br>appli<br>forma | cable | The New Student Data form (see answer to question 16) used to populate LMS provides a Privacy Act Statement. Documentation for non DTRA-provided training is provided by the individual. Student data and training history information is provided to the student, student supervisor, as well as to training coordinators. It is also available to the student on-line via the DTRA Network. |
|                                |       | To the extent applicable, non-DTRA courses would provide required Privacy Act Statements.   |
|                                |       |   |
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|                                |       |   |

### NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.