



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Department of the Navy Heritage Asset Management System /  
Collections Management System  
(DONHAMS / DONCOMS)

Department of the Navy - Naval History & Heritage Command (NAVHISTHERITAGE)

### 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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

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

- Yes, DITPR      Enter DITPR System Identification Number
- 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

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 retrieved by name or other unique identifier. PIA and Privacy Act SORN information should be consistent.

- Yes
- No

If "Yes," enter Privacy Act SORN Identifier

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.

**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

TBD. Submitted to DNS-5 for 60-day comment period.

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.

DoD 5000.64 - Defense Property Accountability - Accountability and Management of DoD-Owned Equipment and Other Accountable Property;

Chief Financial Officers Act of 1990 (Public Law 101-576);

Memorandum dated 16 January 2003 from Deputy Assistant Secretary (Environment and Safety) to Director of Naval History (N09BH) - DONHAMS/DONCOMS is the Department of the Navy's heritage asset cataloging and tracking application. This application was mandated for use 16 Jan 2003.

**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.

This database is used to manage the Department of the Navy's heritage assets, which includes historic artifacts, and artwork. The names, addresses and in some cases phone numbers, e-mail addresses, and details such as spouse and children of donors, original recipients, and commands are captured in this collections management database as part of the object's provenance, and to help establish the history and ownership of the object.

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

The privacy risk associated with PII collected is unauthorized disclosure. This risk is addressed by limiting access to the database exclusively to employees and contractors responsible for updating and maintaining the Heritage Assets data. All access to information in the database is strictly controlled by field name, and all fields to be viewed must be specified and vetted by database administrators. No fields containing personal information are authorized to be specified in general queries, FOIA or otherwise, without permission from the donor. No PII is shared via any data exchange (see 2h next).

**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. NAVHISTHERITAGE

**Other DoD Components.**

Specify. N/A

**Other Federal Agencies.**

Specify. N/A

**State and Local Agencies.**

Specify. N/A

**Contractor (Enter name and describe the language in the contract that safeguards PII.)**

Specify. N/A

**Other (e.g., commercial providers, colleges).**

Specify. N/A

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

Yes

No

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

When an individual donates an artifact to the Navy they have to sign a Deed of Gift Agreement, supplying their name, address, and phone number. NHHHC is compliant with the standard museum practice of maintaining donor confidentiality. Donor PII is not released outside NHHHC under normal circumstances. The Deed of Gift Agreement provided to all individual donors specifies how NHHHC will use PII, and their election for such use may be rescinded by any donor at their election at any subsequent time. Failure to permit information collection may prohibit acceptance of a gift or donation. Rescinding prior consent to information collection may require return of a gift or donation to the donor.

(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.

Donors may specify how or if they want their donation to be credited. If a donor specifically requests that their information not be included in the database, an 'Anonymous' place holder would be inserted. We have not had such a request. Failure to permit use of PII has no consequence other than a donor being credited anonymously.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

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

Privacy Act Statement

Privacy Advisory

Other

None

Describe each applicable format.

The following appears in the Deed of Gift Agreement sent to donors for signature:

"I understand that museum records-keeping procedures require that my name and address be kept on file, and I hereby acknowledge that I do not consider this to be an invasion of my privacy.

"PURPOSE: To provide a record of donations and contributions of historical properties to the Department of the Navy; to enable the Department of the Navy to provide upon request by the donor or donor's heirs information concerning the status/location of his/her donation; to enable the United States Navy to establish title to the property.

"ROUTINE USE: Information may be disclosed to a municipal corporation, a soldier's monument association, a state museum, an incorporated museum or exhibition operated and maintained for educational purposes only, a post of the Veterans of Foreign Wars or the American Legion, other recognized veterans' groups, other organizations qualified under the provisions of 10 U.S.C. 2572 and 7545, or other Federal organizations upon donation or loan of the historical property to one of those organizations.

"DISCLOSURE: Disclosure of the requested information is voluntary. Failure to provide complete information may prohibit acceptance of gift or donation."

**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.**