PRIVACY IMPACT ASSESSMENT (PIA)

For the

Marine Corps Aviation Learning Management System - Enterprise (MCALMS-E)

Department of the Navy - USMC

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
☒ Existing DoD Information System  ☐ Existing Electronic Collection
☐ Significantly Modified DoD Information System

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  DITPR ID: 13968  DITPR DON ID: 22232
☐ 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  UUI: 007-000009996

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  NM01500-2

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://dpcld.defense.gov/Privacy/SORNs.aspx

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

MCALMS-E does not collect PII from members of the public.

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 PIAs 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.

It is a DoD requirement that the Marine Corps Aviation Learning Management System - Enterprise (MCALMS-E) information system collects the basic information that it does in order to track student progress in taking their online coursework via their electronic training jacket. Collected information is minimized and low impact PII (e.g., no SSNs are collected).

SORN NM01500-2, Department of the Navy (DON) Education and Training Records, (November 22, 2010, 75 FR791083), authorities:

10 U.S.C. 5013, Secretary of the Navy;
10 U.S.C. 5041, Headquarters, Marine Corps function, composition;
OPNAVINST 1510.10B, Corporate Enterprise Training Activity Resource System (CeTARS), Catalog of Navy Training Courses and Student Reporting Requirements;
MCO 1580.7D Schools Inter-service Training;
E.O. 9397 (SSN), as amended.
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.

The Marine Corps Aviation Learning Management System Enterprise (MCALMS-E) is a Web-based system designed to present learning and knowledge sharing opportunities to its target audience, primarily Marine Corps Aviation users, students, and Instructors, both in the field and in the schoolhouse. It has been specifically designed for a US DoD user environment providing learning and management tools for both self-paced and instructor led training content. MCALMS-E supports the ADL initiative through the delivery of SCORM compliant courseware as well as the delivery of other presentation media such as PowerPoint presentations, Seminars, Webinars and reference/resource sharing. Individual student accounts are created in order to allow students to securely log-in with a CAC and be able to track their progress with training requirements.

Personal information collected: Account requests require name, service branch, pay grade, rank, job specialty category and code, and official e-mail. Training completion and reoccurring certification completion data are generated and stored by the MCALMS-E application when students complete courseware while logged on to their training account.

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

There is minimal risk to privacy associated with the PII collected as the information is low risk and associated with account creation. The web site is CAC enforced and only CAC users can access the web site in order to request an account. Accounts are specific to the individual and no unauthorized person has access to any of the account information. Users must log-in with their CAC each time they access the web site in order to take online training and their log-in credentials are stored encrypted on the secure servers (hardware located in a USMC secure data center).

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. Only electronic training jacket information (to include name, rank, and MOS) is shared by the students and as required by the MCALMS-E administrators with Squadron Safety Security Officers to validate mission-critical training requirements.

☐ Other DoD Components.

Specify.

☐ Other Federal Agencies.

Specify.

☐ State and Local Agencies.

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

☐ Other (e.g., commercial providers, colleges).
Specify.

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.

Users can choose not to enter the required information, but then they will not be granted an account and will not be able to take required 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.

The functionality of the system requires that user accounts are standardized so that basic identifying information necessary to differentiate between individual students in order to maintain their training records are collected. Providing information is considered granting consent for account creation.
k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- [x] Privacy Act Statement
- [ ] Privacy Advisory
- [ ] Other
- [ ] None

Describe each applicable format.

The following Privacy Act Statement appears when student's request an account and must be acknowledged by the student prior to entering any PII:

In accordance with the Privacy Act of 1974 (Public Law 93-579), this notice informs you of the purpose for collection of information on this form. Please read it before completing the form.

**AUTHORITY:** 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN).

**PRINCIPAL PURPOSE:** This System of Records is governed by Privacy Act System of Records Notice NMO 1500-2 Department of the Navy (DON) Education and Training Records which can be downloaded at http://dpcio.defense.gov/privacy/SORNs/component/navy/NMO1500-2.html. Information collected by this System will be used for system user authentication, user identification, and for data matching.

**RETENTION AND SAFEGUARDS:** The information collected in this System will be maintained in a database with restricted, limited access by authorized personnel who are properly screened, cleared, and trained. The database is protected by password, unique user IDs, and applicable layers of security access within applications. Records in this file system will only be retrieved by name and CAC. Automated MCALMS-E records are retained permanently. The records are utilized for near term and historical assessments including training schools/courses, recruit selection criteria, training requirements, individual course completion, school training throughput, and student attrition. Student and individual Marine training and education records are maintained in the U.S. Marine Corps Training and Education Command (TECOM), Marine Corps Integrated Management System (MCTIMS) database and the U.S. Marine Corps Distance Learning Systems (MARINE.NET) database located at the TECOM, 3300 Russell Road, Quantico VA 22134-5001.

**ROUTINE USES:** To various officials outside the Department of Defense (DoD) specifically identified as a Routine Use in Privacy Act System of Records Notice NMO 1500-2 Department of the Navy (DON) Education and Training Records for the stated specific purpose of that Routine Use. Additionally, information may be shared outside the DoD pursuant to the blanket routine uses established by the Department of Defense Privacy Office that apply to all DoD Privacy Act Systems of Records and posted at http://dpcio.defense.gov/privacy/SORNs/blanket_routine_uses.html.

**DISCLOSURE:** Providing information on this form is mandatory.
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.