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:

My Education (My Education)

2. DOD COMPONENT NAME:

Department of the Navy

3. PIA APPROVAL DATE:

06/27/18

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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
- [x] 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
- [x] 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.

My Education is a suite of applications (USMAP, NCMIS, JST) that track and verify service members' voluntary education. My Education functions include: the validation and provision of eligibility documentation to academic institutions for Tuition Assistance (TA), the provision of metrics to the Department of Labor (DoL), the generation DoL apprenticeship certificates, and the generation of military transcripts for service members, veterans, authorized individuals, and academic institutions. The system stores and processes Personally Identifiable Information (PII), such as: Social Security Number (SSN), student name, ID number, military record data, education data, race, birth date, and telephone numbers. The data is stored in an encrypted database.

-United Services Military Apprenticeship Program (USMAP) is a web-based application that provides: improved availability, timely and accurate reporting of apprentice data, and near real-time apprentice tracking to the Navy, Marine Corps, and Coast Guard community. Active duty, Navy, Marine, and Coast Guard personnel are eligible for and have access to the USMAP site for enrollment and processing of Progress/Status reports. USMAP transcripts are generated upon receipt and data is posted on-line for retrieval by individual personnel. The system provides comprehensive data management of apprentice information from application to completion. USMAP functions include: management of resources and facilities, the evaluation of individual qualifications, the identification of individual training requirements and deficiencies, the tracking, evaluation and analysis of members records, the maintenance and production of USMAP documents, and applicable trade management. Trade management involves: enrollments, scheduling, availability, assignment and control. USMAP also exchanges data with other Information Systems to ensure reporting requirements are accomplished.

-Navy College Management Information System (NCMIS) provides an on-line real-time system for authorizing Tuition Assistance (TA) for Navy, Marine and Coast Guard service members. NCMIS provides the same capability for the following programs: Graduate Education Voucher (GEV) program, The Enlisted Education Voucher Program, and the Seaman to Admiral 21st Century (STA21) program. NCMIS captures both financial and program data for these programs. NCMIS provides on-line real time financial tracking and program management for the Program Afloat College Education (PACE) program. NCMIS is the Navy's sole source of degree information pertaining to the: Navy Enlisted Master File, the Electronic Training Jacket, as well as the source of academic course information for the Joint Service Member Transcript. NCMIS functions as the original source entry for: TA, GEV program, STA21 program, Advanced Education Voucher (AEV), Program, Afloat College Education (NCPACE), and Introductory Flight Syllabus (IFS). As a single integrated system, the NCMIS mission is to provide dynamic real-time program operation for: Navy, Marine, and Coast Guard education offices, as well as the Virtual Education Center (VEC) and ROTC units. There are over 3,361 users around the world for which real time program and financial tracking is provided. NCMIS provides comprehensive day-to-day support and functions for the Navy, Marines and Coast Guard voluntary education programs. Data collected includes: Name, DoD ID Number, SSN, date of birth, Expiration of Active Obligated Service (EAOS) date, course information (title, credit hours' level, and grades), enlisted degrees completed, rate, rank, command, school attended, and counseling records.

- The Joint Services Transcript (JST) is a web-based application that translates military training and occupations into recommended college

credits as a military transcript. Unofficial transcripts are generated in real-time via the web site for the Army, Navy, Marine Corps, Coast Guard and National Guard active and separated (veterans) personnel. Official military transcripts are released by individuals to post-secondary academic institutions. Data collected includes: SSN (DoD ID Number not available for separated personnel before DoD ID Number's existed), training courses completed, job related positions held (i.e., Army Military Occupation Specialties, Navy Enlisted Rates and Classifications, Officer Designated and Billeting Codes, Coast Guard rates and officer codes, Marine Corps occupation specialties), Defense Language Proficiency Testing (DLPT), and certifications and licenses.

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)*

My Education collects PII to verify, identify and authenticate users before providing system access. The data collected provides data matching for training, occupational, and educational records. The purpose of this data collection is to generate military transcripts that show the recommended college credit via the web and to provide official military transcripts to academic institutes. My Education also collects PII to verify eligibility for service members to participate in various voluntary education programs.

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.

When individuals want to use various My Educations products, they are validated by data received from the SFTP server. Before this is accomplished, they are presented with a Privacy Advisory. The user has the option to click a button and accept the collection/use of their PII or not accept and be forced to exit the screen. Failure to accept the collection and use of their PII information, My Education would not be able to accurately identify, verify and authenticate users before providing system access.

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.

When an individual provides their PII consent is assumed.

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

You are accessing a U.S. Government (USG) Information System (IS) that is provided for USG-authorized use only.
By using this IS (which includes any device attached to this IS), you consent to the following conditions:
.The USG routinely intercepts and monitors communications on this IS for purposes including, but not limited to, penetration testing, COMSEC monitoring, network operations and defense, personnel misconduct (PM), law enforcement (LE), and counterintelligence (CI) investigations. .At any time, the USG may inspect and seize data stored on this IS.
.Communications using, or data stored on, this IS are not private, are subject to routine monitoring, interception, and search, and may be disclosed or used for any USG authorized purpose.
.This IS includes security measures (e.g., authentication and access controls) to protect USG interests not for your personal benefit or privacy.
.Notwithstanding the above, using this IS does not constitute consent to PM, LE or CI investigative searching or monitoring of the content of privileged communications, or work product, related to personal representation or services by attorneys, psychotherapists, or clergy, and their assistants. Such communications and work product are private and confidential.

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.
-Department of the Navy (DoN),
-Bureau of Personnel (BUPERS),
-Navy Logistics Library (NLL),
-Naval Personnel Command (NPC),
-Navy Training Management Planning System (NTMPS)
-CeTARS

☒ Other DoD Components — Specify.
-Army, Marine Corps and Coast Guard have access to their service data only.

[X] Other Federal Agencies	Specify.	A Program Completion Letter (PCL) is provided to the Department of Labor and the Department of Transportation with an individual's name and completion date only. Members of the Coast Guard only have access to their own information.
[X] State and Local Agencies	Specify.	A Program Completion Letter is provided to The State Departments of Labor for North Carolina and Virginia with an individual's name and completion date only.
[ ] 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.	N/A
[X] Other *(e.g., commercial providers, colleges).*	Specify.	Academic Institutions

i. Source of the PII collected is: *(Check all that apply and list all information systems if applicable)*

- [X] Individuals
- [X] Existing DoD Information Systems
- [ ] Other Federal Information Systems
- [ ] Databases
- [ ] Commercial Systems

PII information is pulled from NCMIS and shared with the USMAP system, and on paper-based and electronic enrollment forms. Documents are provided by individuals who wish to update their JST records. All DOD information is from existing DOD information systems (e.g. Army ITAP-DB and ATRRS, Navy CeTARS, Navy Foreign Language Office, Marine Corps ODSE, MCTIMS, MCTFS, Coast Guard Institute, DMDC) except for personal e-mail address and phone number. These are provided by the service members when they use the My Education website to apply for tuition assistance.

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

- [X] E-mail
- [ ] Face-to-Face Contact
- [X] Fax
- [X] Information Sharing - System to System
- [X] Other *(If Other, enter the information in the box below)*
- [ ] Official Form (*Enter Form Number(s) in the box below)*
- [X] Paper
- [X] Telephone Interview
- [X] Website/E-Form

Secure FTP.

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.

[X] Yes [ ] No

If "Yes," enter SORN System Identifier NM01500-2

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.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. DAA-NU-2015-0001-003

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

(3) Retention Instructions.

JST contains record data that is kept for 3 years. NCMIS contains record data that is kept indefinitely. All record data is kept within an encrypted database.

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 statue 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.

SORN NM01500-2, Departmentof the Navy (DON) Education and Training Records, (November 22, 2010, 75 FR71083), 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; and E.O. 9397 (SSN), as amended.

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 PII in My Education is not collected from the general public.