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:
Command Individual Risk and Resiliency Assessment System (CIRRAS)

2. DOD COMPONENT NAME:
Department of the Navy/United States Marine Corps

3. PIA APPROVAL DATE:
12/18/19

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
   - From both members of the general public and Federal employees and/or Federal contractors
   - From 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
   - Existing DoD Information System
   - 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 Command Individual Risk & Resiliency Assessment System (CIRRAS) enables United States Marine Corps (USMC) Commanding Officers and Senior Enlisted advisors to make informed and timely decisions on Force Preservation Risk Assessments based on the identification and tracking of individual service member behaviors associated with increased risk or resiliency as defined by the Commandant's "Six Fs." The Six Fs are Fidelity, Fighter, Fitness, Family, Finances and Future. The CIRRAS will be employed from the Regimental/ Group Commander to the immediate supervisors (Platoon Commander/ Officers in Charge) of all service members under the intent of Marine Corps Order (MCO) 1500.60, Force Preservation Council (FPC) Program.

PII collected by CIRRAS: please see section 2, question a.

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 collection is done in order to comply with MCO 1500.60 to provide USMC Commanders and their Force Preservation Councils with holistic views of their Service Members and trend analysis on the unit to increase unit and mission readiness by optimizing the potential of every Marine and Sailor. (mission-related use)

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.

   Providing the information is "voluntary; however, if the Military Service Member fails to provide the information requested, the USMC Commander and their Force Preservation Council will not be able to ensure mitigation services and or support is provided".

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.

   Military Service Members can inform their USMC Commanders or their Force Preservation Council members in writing that they give or withhold their consent to use their PII within CIRRAS. Those Service Members withholding consent will be informed in writing that the command will not be able to ensure mitigation services or support are provided without external knowledge of the risks not documented in CIRRAS.

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 ☐
PRIVACY ACT INFORMATION - THE INFORMATION ACCESSED THROUGH THIS SYSTEM IS FOR OFFICIAL USE ONLY AND MUST BE PROTECTED IN ACCORDANCE WITH THE PRIVACY ACT OF 1974.

The information you provide to the Command Individual Risk & Resiliency Assessment System (CIRRAS) is covered by the Privacy Act of 1974. To receive a copy of the privacy Act Statement for the actions you enter into the system, please see your Local Command CIRRAS System Administrator or the CIRRAS System Advocate, Manpower & Reserve Affairs (M&RA) Marine and Family (MF).

AUTHORITY: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; DoDI 6490.08, Command Notification Requirements to Dispel Stigma in Providing Mental Health Care to Service Members, August 17, 2011; DoD 6025.18-R, DoD Health Information Privacy Regulation, January 24, 2003; MCO 1500.60, Force Preservation Council (FPC) Program; MCO 3500.27C Risk Management; MCO 1752.5C Sexual Assault Prevention & Response; MCO 5300.17A Substance Abuse Program; MCO 5100.29B Marine Corps Safety Program; MCO 5100.19F Marine Corps Traffic Safety Program; and SORN M05230-1.

PURPOSE: To enable USMC Commanding Officers and their assigned Force Preservation Council Members to make informed and timely decisions on Force Preservation Risk Assessments to optimize individual/unit readiness and facilitate enterprise-wide risk management. Individual data will assist Commander’s by quickly identifying those Marines or Service Members requiring immediate command attention.

ROUTINE USES: Information will be accessed by Commander’s and their assigned Force Preservation Council Members with a need to know in to meet the purpose. Information is not routinely disclosed outside of DoD. A complete list and explanation of the applicable routine uses is published in the authorizing SORN available at https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/.

DISCLOSURE: Voluntary; however, if the Military Service Member fails to provide the information requested, the USMC Commander and their Force Preservation Council will not be able to ensure mitigation services and or support is provided.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)

- [x] Within the DoD Component
- [ ] Other DoD Components
- [ ] Other Federal Agencies
- [ ] State and Local Agencies

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.
- [ ] Other (e.g., commercial providers, colleges).

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

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

Personally Identifiable Information (PII ) will be collected through an establishing an interface with Marine Corps Total Force System (MCTFS) through the utilization of the Defense Information Systems Agency (DISA) Secure File Gateway (SFG) that will provide the Service Members authoritative individual data source. Personally Identifiable Information (PII ) will also be collected through voluntary face to face Service Member (SM) individual disclosure to their First Line Leaders. PII will also be collected through USMC Commanding Officers and their assigned Force Preservation Council Members on SMs assigned to their command. Authority to input PII and information collected (other than MCTFS info) is managed by the USMC Unit Commander authorizing role based access to members of her/his appointed command's Force Preservation Council

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

- [ ] E-mail
- [x] Face-to-Face Contact
- [ ] Fax
- [x] Information Sharing - System to System
- [ ] Other (If Other, enter the information in the box below)

PII will be collected through an interface with Marine Corps Total Force System (MCTFS) that utilizes the DISA SFG and collected through voluntary service member individual disclosure.

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.

If Yes, enter SORN System Identifier M05230-1

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpclid.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.

Pending submission.

I. 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. N1-NU-89-4

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

(3) Retention Instructions.

CIRRAS has an approved schedule from National Archives and Records Administration (NARA). Record Schedule 5000.32 PERMANENT: Cutoff at end of calendar year. Transfer to the National Archives 25 years after cutoff.

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.

M05230-1, Command Individual Risk and Resiliency Assessment System (CIRRAS), authorities:

10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; DoDI 6490.08, Command Notification Requirements to Dispel Stigma in Providing Mental Health Care to Service Members, August 17, 2011; DoD 6025.18-R, DoD Health Information Privacy Regulation, January 24, 2003; MCO 1500.60, Force Preservation Council (FPC) Program; MCO 3500.27C Risk Management; MCO 1752.5C Sexual Assault Prevention & Response; MCO 5300.17A Substance Abuse Program; MCO 5100.29B Marine Corps Safety Program; MCO 5100.19F Marine Corps Traffic Safety Program.

Note: SORN is in draft being processed in conjunction with this PIA.

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.

CIRRAS does not collect information from members of the "public" (DoDM 8910.01 V2, Encl. 3 7.b.(3)(b).1.b.). Since information is only
collected about active duty and reserve military members.