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:

Secure Personnel Accountability (SPA)

2. DOD COMPONENT NAME:

Department of the Navy

3. PIA APPROVAL DATE:

07/13/20

United States Marine Corps/Manpower and Reserve Affairs (MRA)

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.

SPA provides capability in three primary functions.

Generalized Accountability: SPA provides real time accountability of deployed service members by allowing users to document and store, for historical purposes, daily individual location data by DoD Latitude and Longitude, Military Grid System, and Common Name. This accountability data will be documented for the purpose of improving the Office of Secretary Defense (OSD) Health Services data collection.

Joint and Unit Reporting: SPA allows combatant commanders the ability to manage and deliver required accountability taskings from OSD to include the Joint Personnel Strength Report (JPERSTAT) and unit Personnel Status Report (PERSTAT).

Commander Accountability: SPA allows combatant commanders the ability to manage and deliver required accountability management of present combat strength for use by the commander and his staff.

Personally Identifiable Information collected: Name, (SSN is collected in the database but not viewable through the application), DoD ID Number, Citizenship, Gender, Race/Ethnicity, Birth Date, Place of Birth, Home Telephone Number, Mailing/Home Address, Religious Preference, Security Clearance, Spouse Information (Name, Address, and Relation), Marital Status, Child Information (Name, Address, and Relation), Medical Information (blood type), Military Records (Rel End of Active Service, Component Code, deployment status data, unit assignment data, physical location data, Rank, Military Occupational Specialty (MOS)), Emergency Contact Information (Name, Address, and Relation).

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)*

Identification. PII must be collected to support personnel accountability of all personnel assigned or attached to Marine Corps commands. PII within SPA is used to assist administrative personnel to properly identify, account for and report on personnel as required by Under Secretary of Defense (USD) Personnel and Readiness Memo to the Assistant Commandant of the Marine Corps, Subject: Reporting of Personnel Data Supporting Contingencies and In-Theater Locations dated 10 Apr 2003.

e. Do individuals have the opportunity to object to the collection of their PII? [ ] Yes [x] 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.

PII is not collected directly from the individual.

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.

PII is not collected directly from the individual.

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

PII is not collected directly from the individual.

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.	System: Marine Corps Total Force System (MCTFS), System Owner: USMC TSO & M&RA System: Total Force Data Warehouse, System Owner: M&RA
☐ Other DoD Components	Specify.	System: Joint Personnel Accountability Reconciliation and Reporting (JPARR), Owner: DoD, System: Defense Enrollment Eligibility Reporting System, System Owner: Defense Manpower Data Center (DMDC) System: Cross Domain Solution (CDS), System Owner: DISA
☐ Other Federal Agencies	Specify.	
☐ State and Local Agencies	Specify.	
☒ 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.	SAIC is the SPA contractor. Contractors sign a Non Disclosure Agreement (NDA) to assure confidentiality between the contractor and government to protect any type of confidential and proprietary information. Specific language in the contract is described as: Security measures shall be taken to satisfy the security requirements in accordance with the Marine Corps System Security Plan. SPA data/information shall be protected from an Information Systems Security (INFOSEC) perspective. The contractor shall apply security considerations to software design and management. Only contractors who have a valid need to know and a favorably adjudicated background investigation are permitted to have access to SPA. During the course of routine system maintenance contractors may be exposed to PII. Users are DoD employees or authorized contractors supporting the DoD. The applicable FAR privacy clauses will be added when the contract is updated in September 2020.
☐ Other *(e.g., commercial providers, colleges).*	Specify.	

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

☐ Individuals ☐ Databases

☒ Existing DoD Information Systems ☐ Commercial Systems

☐ Other Federal Information Systems

System: Marine Corps Total Force System (MCTFS), Operational Data Store Enterprise (ODSE), System Owner: USMC TSO & M&RA
System: Total Force Data Warehouse, System Owner: M&RA
System: Joint Personnel Accountability Reconciliation and Reporting (JPARR), System Owner: DoD
System: Defense Enrollment Eligibility Reporting System, System Owner: Defense Manpower Data Center (DMDC)
System: Cross Domain Solution (CDS), System Owner: DISA

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

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

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.

☒ Yes ☐ No

If "Yes," enter SORN System Identifier M01040-3

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. Record Schedule 1000-3; DAA-NU-2015-0001-0003

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

(3) Retention Instructions.

Record Schedule 1000-3, Military Personnel Information Systems Master Files: PERMANENT. Cutoff and transfer to the National Archives annually. DAA-NU-2015-0001-003.

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 M01040-3, Marine Corps Manpower Management Information System Records (April 29, 2010, 75 FR 22570)"), authorities:
10 U.S.C. 5013, Secretary of the Navy;
10 U.S.C. 5041, Headquarters, Marine Corps;
10 U.S.C. 1074f, Medical Tracking System for Members Deployed Overseas;
32 CFR 64.4, Management and Mobilization;
DoDI 1215.13, Reserve Component (RC) Member Participation Policy;
DoDI 3001.02, Personnel Accountability in Conjunction with Natural and Manmade Disasters;
CJCSM 3150.13B, Joint Reporting Structure Personnel Manual;
DoDI 6490.03, Deployment Health;
MCMEDS;
SECNAVINST 1770.3D, Management and Disposition of Incapacitation Benefits for Members of the Navy and Marine Corps Reserve Components (Renamed Line of Duty (LOD));
MCO 7220.50, Marine Corps Policy for paying Reserve Marines; 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.

SPA does not collect Public data.