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:
NAF MCCS Public Facing Website (NAF PFW)

2. DOD COMPONENT NAME: Department of the Navy

3. PIA APPROVAL DATE: 02/10/21

United States Marine Corps - Marine Corps Manpower and Reserve Affairs (M&RA), Business and Support Services Division (MR)

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

☐ New Electronic Collection

☐ Existing Electronic Collection

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.

NAF PFW is a Marine Corps Community Services (MCCS) consolidated enterprise public website used as a medium to provide authorized patrons information about MCCS businesses and services. NAF PFW will be stored in a FedRAMP approved cloud solution. A website free commercial based traffic analysis application, Google Analytics, will provide real-time aggregated market-segment statistics and analysis of users’ interactions with the website for the purpose of improving service delivery.

Types of personal information collected in the system include name and contact information for MCCS outreach/subscription requests and information relating to resource requests by transitioning Marines.

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)

PII is collected for mission-related and administrative uses to provide information about MCCS businesses and services and to provide transition assistance and sponsorship for Marines who honorably leave active service and return to civilian life.

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.

Individuals may elect not to provide PII by not signing up for MCCS communications, by requesting to opt-out of previous subscription sign-ups, and by not requesting assistance with their career and life goals as they transition outside of military service.

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.

Providing information is considered consent. All information collected on the individual may be used for mission-related and administrative use without further consent of 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

Privacy Advisory for electronic subscriptions: Disclosure of your e-mail address is voluntary but is necessary to deliver the requested information to you. If not provided, we cannot deliver this information. See also our Security and Privacy notice. Your e-mail address is
removed from the prevention newsletter distribution system when you unsubscribe. To unsubscribe, send an email to hqmcprevention@usmc.mil and include the word “Unsubscribe” in the Subject line.

Privacy Act Statements for MCCS outreach/communication subscriptions:
AUTHORITY: 10 U.S.C. 5013; 10 U.S.C. 5041; MCO P1700.27B W CH1; and SORNs DPR 40 DoD, DPR 46 DoD, N01752-1, N01754-1, N04066-4, N01700-1, N01754-2, N01754-3, N04060-1, N005070-1, M01754-4, M01754-5, and M01754-6. A complete list of authorities for the respective Marine Corps Community Services (MCCS) business or service is provided on the applicable authorizing SORN listed below.

PURPOSE: Information requested is used for the purpose of managing and administering MCCS electronic subscriptions and mailing lists to provide notifications and/or publications.

ROUTINE USES: Information will be accessed by MCCS authorized personnel with a need-to-know to meet the purpose. A complete list and explanation of the applicable routine uses for each MCCS business or service is published in the respective authorizing SORN and may be accessed at https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/NavyUSMC-Article-List/.

DISCLOSURE: Voluntary; however, failure to provide the requested information may result in an inability to receive distributions relating to MCCS sales, promotions, available products, special events, and services.

System of Record Notices
DON Child and Youth Program, NM01754-3;
DON Family Support Program Volunteers, NM01754-2;
DON General Morale, Welfare, and Recreation Records, N01700-1;
Exceptional Family Member Program Records, M01754-6;
Family Advocacy Program System, N01752-1;
Library Patron File, NM05070-1;
Marine Corps Family Readiness Mass Communication Records, M01754-5;
Marine for Life Program, M01754-4;
Navy and Marine Corps Exchange Sales Control and Security File, NM04060-1;
Navy Family Support Clinical Counseling Records, N01754-1;
Navy Lodge Records, N04066-4;
Recovery Coordination Program Support Solution, DPR 40 DoD; and
Spouse Education and Career Opportunities (SECO) Program, DPR 46 DoD.

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.)

[X] Specify.

Raven Multimedia DBA Raven Solutions will be providing the Public Facing Website management services. Language in the contract that safeguards PII includes MCCS NAF privacy clauses which are comparable to the FAR privacy clauses 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and 39.105, Privacy.

G & G Graphics and Promotions, Inc./Proforma Idea Press is utilizing the Salesforce system for managing/ administering MCCS marketing and outreach for its businesses and services. Language that safeguards PII includes FedRAMP and DISA compliance as well as confidentiality and non-disclosure agreements.

□ 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)

[X] Individuals

□ Existing DoD Information Systems

□ Databases

□ Commercial Systems
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

Official forms include NAVMC 9, "M4L Registration Form," and NAVMC 10, "M4L Resource Form.
The website/e-form refers to the MCCS subscription sign-up via the NAF PFW.

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 M01754-6; NM01754-3; NM01754-2; NV

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

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. GRS 6.5 item 20 and DAA-NU-2015-0001-0031

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

(3) Retention Instructions.

- Marine for Life Forms: Temporary: Cutoff at CY. Destroy when 3 years old (DON Records Schedule 1000-34 General Correspondence (Military Personnel), SSIC 1754.1b).

- Subscription/mailing lists: Temporary. Delete when superseded, obsolete, or when customer requests the agency to remove the records (DON Records Schedule 5000-140, Mail, Printing, and Telecommunication Services Control Records notates to use GRS 6.5 item 20).

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 statute 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.
10 U.S.C. 113; Secretary of Defense; DoD Directive 5124.02, Under Secretary of Defense for Personnel and Readiness (USD(P&R)); DoD Instruction 1500.24, Recovery Coordination Program (RCP); and E.O. 3937 (SSN), as amended.


SORN M01754-5, Marine Corps Family Readiness Mass Communication Records (May 19, 2011, 76 FR 28694) authorities: 10 U.S.C. 5013; Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps: function, composition; MCO 1754.6C, Marine Corps Family Team Building (MCFTB); and E.O. 9397 (SSN), as amended.

SORN M01754-6, Exceptional Family Member Program Records (April 17, 2009, 74 FR 17838) authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, U.S. Marine Corps; MCO 1754.4C, Exceptional Family Member Program; and E.O. 9397 (SSN), as amended.

SORN N01752-1, Family Advocacy Program System (April 28, 1999, 64 FR 22840) authorities: 5 U.S.C. 301, Departmental Regulations; DoD Instruction 6400.01 and DoDM 6400.01 Volumes 1-4, Family Advocacy Program (FAP); Secretary of the Navy Instruction 1752.3B, Family Advocacy Program (FAP); OPNAVINST 1752.2C, Navy Family Advocacy Program; BUMEDINST 6320.22; MCO 1754.11, Marine Corps Family Advocacy and General Counseling Program; and E.O. 9397 (SSN), as amended.


SORN NM01754-3, DON Child and Youth Program (May 27, 2010, 75 FR 29728) authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; DoD Instruction 6060.02, Child Development Programs; DoD Instruction 6060.3, School Age Care Program; DoD Instruction 6060.04, Youth Services (YS) Policy; OPNAV Instruction 1700.9E w/Ch1, Child and Youth Program; Marine Corps Order 1710.30, Marine Corps Child and Youth Programs (CYP); 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.

-Marine for Life (MFL) Forms: DoD reviewed and determined an OMB Control Number was not required.
-MCCS subscriptions: Per OMB Memo dtd April 7, 2010, electronic subscriptions and agency mailing lists for agency notifications or publications are not subject to the Paperwork Reduction Act.