

DOD PRIVACY IMPACT ASSESSMENT (PIA) FOR DLS

1. **Department of Defense (DoD) Component.** Defense Threat Reduction Agency (DTRA).
2. **Name of Information Technology (IT) System.** Distance Learning System (DLS)
3. **Budget System Identification Number (SNAP-IT Initiative Number).** 1815.
4. **System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR)).** 3291.
5. **IT Investment (OMB Circular A-11) Unique Identifier (if applicable).** 007-97-05-44-02-1815-00-103-210
6. **Privacy Act System of Records Notice Identifier (if applicable).** HDTRA 014 (Student Records, May 9, 2007, 72 FR 26343),
<http://www.defenselink.mil/privacy/notices/dswa/HDTRA014.html>.
7. **OMB Information Collection Requirement Number (if applicable) and Expiration Date.** N/A.
8. **Type of authority to collect information (statutory or otherwise).** "5 U.S.C. 301, Departmental Regulations; 5 U.S.C. 4103, Establishment of Training Programs; 10 U.S.C. 1701 Management Policies; E.O. 11348, Providing for the further training of Government employees; 5 CFR part 410, Office of Personnel Management-Training and E.O. 9397 (SSN)."
9. **Provide a brief summary or overview of the IT system (activity/purpose, present life-cycle phase, system owner, system boundaries and interconnections, location of system and components, and system backup).** This commercial-off-the-shelf (COTS) application tracks and maintains an individual student training history and provides a platform for on-line training and in-residence on-line training registration for civilian, military, and contractor students. Statistical data, with all personal identifiers removed, are used to compare training completion data and service agency and organization quota reports as well as student roster lists for class instructors. The present life cycle is Operations and Support. DLS data resides on its own server in the DTRA DMZ. DLS web application code resides on the DNWS web server located in the DTRA DMZ. System backup is accomplished through routine SQL Server data backups on the data server and through routine backups of the DNWS web server. The system owner is the Director, DTRA (Code BE-BHP). DLS is located at the Defense Nuclear Weapons School, Defense Threat Reduction Agency, 1900 Wyoming Boulevard SE, Kirtland Air Force Base, NM 87117-5669.
10. **Describe what information in identifiable form will be collected and the nature and source of the information (e.g., names, Social Security Numbers, gender, race, other component IT systems, IT systems from agencies outside DoD, etc.).** Name, Social Security Number (SSN), occupational series, grade, and supervisory status, registration, student development curricula, and training data, including start and completion dates, course descriptions, and related data. Where training is required for professional licenses, certification, or recertification, the file may include proficiency data in one or more skill

areas. Electronic records may contain computer logon data and personal emergency contact information.

11. **Describe how the information will be collected (e.g., via the Web, via paper-based collection, etc.).** Data for student records is collected via voluntary submission of a student data form either electronically or in hardcopy. Training history information is collected via a combination of automatic data update for on-line courses and data entry by training coordinators for instructor-led courses, external course registration data, and voluntarily submitted training completion certificates for external courses.
12. **Describe the requirement and why the information in identifiable form is to be collected (e.g., to discharge a statutory mandate, to execute a Component program, etc.)** DLS tracks and in some cases provides the platform for the conduct of mandatory training mandated by Federal statute and DoD directive/instruction.
13. **Describe how the information in identifiable form will be used (e.g., to verify existing data, etc.).** Information is used to manage and administer training and development programs. Statistical data, with all personal identifiers removed, are used to compare training completion data among different agencies and students who attend classes online and in-residence at DNWS.
14. **Describe whether the system derives or creates new data about individuals through aggregation.** Individual data is aggregated into class rosters and class attendance lists. Training data is associated or linked with the individual via his/her personal identifier. Registration and training completion for external courses is entered by training coordinators.
15. **Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.).** In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act, these records or information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a (b) (3) as follows:
 - To Federal, state, and local agencies and oversight entities to track, manage, and report on mandatory training requirements and certifications.
 - To public and private sector educational, training, and conferencing entities for participant enrollment, tracking, evaluation, and payment reconciliation purposes.
 - To Federal agencies for screening and selecting candidates for training or developmental programs sponsored by the agency.
 - To Federal oversight agencies for investigating, reviewing, resolving, negotiating, settling, or hearing complaints, grievances, or other matters under its cognizance.
 - The DoD 'Blanket Routine Uses' set forth at the beginning of DTRA's compilation of systems of records notices apply to this system.

16. **Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent.** Individuals can object to the collection of information in an identifiable form about themselves before completing the appropriate DNWS DLS New Student Data form. Online submittal of this form indicates consent. Information on individuals' training completion is automatically updated for on-line courseware, obtained from the class roster for in-residence instructor-led courses.
17. **Describe any information that is provided to an individual, and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of delivery (e.g., written, electronic, etc.), regarding the determination to collect the information in identifiable form.** All forms and databases (see answer to question 16) used have a Privacy Act Statement on them. Documentation for non-DTRA-provided training is provided by the individual. Reports printed from DLS do not require a Privacy Act Statement. Student data and training history information is provided to the student, as well as to training coordinators.
18. **Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form. Paper records, electronic data (servers/workstations/backup tapes) are located in an area accessible only to authorized personnel.** DLS is located on the computer floor located in building 20676 room 153 Kirtland AFB, which is protected by security guards and/or intrusion alarm systems. Access to DLS is limited to those who require the records in the performance of their official duties and is controlled through DNWS' internal network which requires password validation prior to use. Within the DLS application, training coordinator access is specified by the DLS administrator. SQL Server permissions are necessary and granted by the SQL Server Administrator under the direction of the DLS administrator. Records are maintained in areas accessible only to the DNWS registrar's office. Paper Records are secured in locked cabinets during non-duty hours and access to electronic records is restricted by the use of passwords. Printed material is marked For Official Use Only (FOUO), a statement that it contains Privacy Act information, and that Freedom of Information Act (FOIA) Exemption B6 applies. Printed material is disposed of by either placement in a burn bag or shredding.
19. **Identify whether the IT system or collection of information will require a System of Records notice as defined by the Privacy Act of 1974 and as implemented by DoD Directive 5400.11, "DoD Privacy Program," May 08, 2007. If so, and a System Notice has been published in the Federal Register, the Privacy Act System of Records Identifier must be listed in question 6 above. If not yet published, state when publication of the Notice will occur.** DLS requires a System of Records Notice. See question 6 for the Identifier in the Federal Register.

20. Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures. Potential mishandling of privacy information is low. System access is monitored by system administrators and routinely checked for requirements of access. All users of the system are required to justify their access via their supervisor.
21. State classification of information/system and whether the PIA should be published or not. If not, provide rationale. If a PIA is planned for publication, state whether it will be published in full or summary form. DLS is unclassified and a PIA will be published in full form.

Preparing Official:

Signature/Date

26 Jul 07

Name

Title: Registrar

Organization: Defense Threat Reduction Agency

Work Phone Number: (505) 853-0182

Email:

Information Assurance Official:

Signature/Date

26 Jul 07

Name:

Title: Chief, Information Assurance Division

Organization: Director's and Staff Offices (DIR-SCA)

Work Phone Number: (703) 767-7840

Email:

Privacy Officer:

Signature/Date

27 Jul 07

Name:

Title: Program Analyst

Organization: Office of the Chief of Staff, Director's and Staff Offices (DIR-COS)

Work Phone Number: (703) 767-1771

Email: !_____

Reviewing Official:

Signature/Date

31 JUL 07

Name:

Title: Chief Information Officer

Organization: Business Enterprise (BE-BI)

Work Phone Number: (703) 767-4918

Email: !_____