

# PRIVACY IMPACT ASSESSMENT (PIA)

### For the

| Executive Performance & Appraisal Tool (EPAT) |  |
|---|--|
| United States Air Force (USAF)                |  |

## **SECTION 1: IS A PIA REQUIRED?**

| a. Will this Department of Defense (DoD) information system or electronic collection of       |
|---|
| information (referred to as an "electronic collection" for the purpose of this form) collect, |
| maintain, use, and/or disseminate PII about members of the public, Federal personnel,         |
| contractors or foreign nationals employed at U.S. military facilities internationally? Choose |
| one option from the choices below. (Choose (3) for foreign nationals).                        |
|   |

|             | (1) | Yes, from members of the general public.   |
|-------------|-----|--|
| $\boxtimes$ | (2) | Yes, from Federal personnel* and/or Federal contractors.                                       |
|             | (3) | Yes, from both members of the general public and Federal personnel and/or Federal contractors. |
|             | (4) | No   |

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

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<sup>\* &</sup>quot;Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

# **SECTION 2: PIA SUMMARY INFORMATION**

| a. | Why is this PIA being created or updated? Choose one:  |   |                           |             |         |                     |  |  |  |
|----|--|---|---------------------------|-------------|---------|---------------------|--|--|--|
|    | $\boxtimes$  | New DoD Informa   | tion System               |             |         | New Electro         | nic Collection   |  |  |
|    |  | Existing DoD Info                                       | rmation Syst              | tem         |         | Existing Elec       | ctronic Collection   |  |  |
|    |  | Significantly Mod<br>System                             | ified DoD Inf             | ormation    |         |                     |  |  |  |
|    |  | s DoD information<br>Network (SIPRNE                    | •                         | •           | l in t  | he DITPR or th      | ne DoD Secret Internet Protocol  |  |  |
|    | $\boxtimes$  | Yes, DITPR  | Enter DITP                | R System    | lden    | tification Number   | 10875  |  |  |
|    | Yes, SIPRNET Enter SIPR  |   |                           | NET Ident   | tificat | ion Number          |  |  |  |
|    |  | No  |                           |             |         |                     |  |  |  |
|    | c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required<br>by section 53 of Office of Management and Budget (OMB) Circular A-11? |   |                           |             |         |                     |  |  |  |
|    |  | Yes   |                           | $\boxtimes$ | No      |                     |  |  |  |
|    | If "Y  | es," enter UPI  |                           |             |         |                     |  |  |  |
|    |  | If unsure,  | consult the C             | omponent    | t IT B  | udget Point of Cor  | ntact to obtain the UPI.   |  |  |
|    |  | this DoD informa<br>s Notice (SORN)?                    | -                         | n or elec   | ctron   | nic collection re   | equire a Privacy Act System of   |  |  |
|    | or law   |   | sidents that is <u>re</u> |             |         |                     | on contains information about U.S. citizens<br>dentifier. PIA and Privacy Act SORN |  |  |
|    | $\boxtimes$  | Yes   |                           |             | No      |                     |  |  |  |
|    | If "Y  | es," enter Privacy /                                    | Act SORN Ide              | entifier    |         | OPM/GOVT-2          |  |  |  |
|    |  | DoD Component-a<br>Consult the Comp<br>access DoD Priva | onent Privacy             | Office for  | addit   | ional information o | or   |  |  |
|    |  | or  |                           |             |         |                     |  |  |  |
|    | Date of submission for approval to Defense Privacy Office Consult the Component Privacy Office for this date.  |   |                           |             |         |                     |  |  |  |

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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 **Enter OMB Control Number Enter Expiration Date**  $\boxtimes$ No f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records. (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same. (2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII. (b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified. Sections 1104, 3321, 4305, and 5405 of title 5, U.S. Code, and Executive Order 12107

e. Does this DoD information system or electronic collection have an OMB Control Number? Contact the Component Information Management Control Officer or DoD Clearance Officer for this information.

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# g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The Executive Performance & Appraisal Tool (EPAT) is a comprehensive tool used to facilitate the feedback and appraisal process for senior executives. It provides the structured framework executives and their raters use at each of three critical stages—creation of performance plan, semi-annual feedback, and annual appraisal—and will ultimately be used to determine appropriate monetary compensation for the executives.

PII: Social Security Number, Last Name, First Name, Middle Initial, Gender, DoD Component, Pay Plan or Military Pay Grade, Person Tier, Position Tier, Position Start Date, Current Base Pay, and Current Locality Pay. Personal documents such as past appraisals may be uploaded if desired.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

The perceived threats are primarily computer hackers, disgruntled employees and state-sponsored information warfare.

All systems are at risk because they may be vulnerable to unauthorized intrusion and hacking. There are risks that EPAT, with its extensive collection of PII, could be compromised.

Because of this possibility, appropriate security and access controls listed in this PIA are in place.

All systems are vulnerable to "insider threats". EPAT administrators are vigilant to this threat by limiting system access to those individuals who have a defined need to access the information. There are defined criteria to identify who should have access to EPAT. These individuals have gone through extensive background and employment investigations.

#### Mitigation:

The following controls are used to mitigate the risks:

- a) Access Controls. Access controls limit access to the application and/or specific functional areas of the application. These controls consist of privileges, general access, password control and discretionary access control. Additionally, each user is associated with one or more database roles. Each role provides some combination of privileges to a subset of the application tables. Users are granted only those privileges that are necessary for their job requirements. The same roles that protect the database tables also determine which buttons and menu items are enabled for the user currently logged on.
- b) Confidentiality. This ensures that data is not made available or disclosed to unauthorized individuals, entities, or processes.
- c) Integrity. This ensures that data has not been altered or destroyed in an unauthorized manner.
- d) Audits. This includes review and examination or records, activities, and system parameters, to assess the adequacy of maintaining, managing and controlling events that may degrade the security posture of the application.
- e) Training. Security training is provided on a continuous basis to keep users alert to the security requirements. Visual effects are used as constant reminders to ensure users always remain aware of their responsibilities. f) Physical Security. This consists of placing servers that contain privileged information in a secure and protected location, and to limit access to this location to individuals who have a need to access the servers. An internal policy is set in place to ensure that there are always no less than two users present at a time when privileged information is being retrieved. Since the server and data reside within an Air Force establishment, the strict security measures set by the establishment are always followed.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

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|    | $\boxtimes$  | Within the DoD Component. |  |  |  |  |  |  |
|----|--------------|---------------------------|--|--|--|--|--|--|
|    |              | Specify.                  | DoD Civilian Personnel Management, SECAF, OSD  |  |  |  |  |  |
|    |              | Other DoD                 | Components.  |  |  |  |  |  |
|    |              | Specify.                  |  |  |  |  |  |  |
|    | $\boxtimes$  | Other Fede                | ral Agencies.  |  |  |  |  |  |
|    |              | Specify.                  | Office of Personnel Management (OPM)   |  |  |  |  |  |
|    |              | State and L               | ocal Agencies.   |  |  |  |  |  |
|    |              | Specify.                  |  |  |  |  |  |  |
|    |              | Contractor                | (Enter name and describe the language in the contract that safeguards PII.)  |  |  |  |  |  |
|    |              | Specify.                  |  |  |  |  |  |  |
|    |              | Other (e.g.,              | commercial providers, colleges).   |  |  |  |  |  |
|    |              | Specify.                  |  |  |  |  |  |  |
| i. | Do i         | individuale               | have the opportunity to object to the collection of their PII?   |  |  |  |  |  |
| ١. | <b>D</b> 0 1 | iliaiviauais              | have the opportunity to object to the conection of their rin:  |  |  |  |  |  |
|    |              | Yes                       | No   |  |  |  |  |  |
|    |              | (1) If "Vec "             | describe method by which individuals can object to the collection of PII.  |  |  |  |  |  |
|    |              | (1) 11 103,               | describe metrod by which individuals can object to the concentral in.  |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
|    |              | (2) If "No," s            | state the reason why individuals cannot object.  |  |  |  |  |  |
|    |              |                           | lluation is a mandated activity, and there is no opportunity for the individual to object to the   |  |  |  |  |  |
|    | indi         | vidual, ensuri            | information. The PII that is collected is critical to associating comments with the appropriate ng monetary payments are given as appropriate and other pay and promotion elements |  |  |  |  |  |
|    | whi          | ch can only b             | e associated through use of PII.   |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
|    |              |                           |  |  |  |  |  |  |
| j. | Do iı        | ndividuals h              | nave the opportunity to consent to the specific uses of their PII?   |  |  |  |  |  |
|    |              | Yes                       | ⊠ No   |  |  |  |  |  |
|    |              |                           | 도괴   |  |  |  |  |  |
|    |              | (1) If "Yes "             | describe the method by which individuals can give or withhold their consent.   |  |  |  |  |  |

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| Performance evaluation is a mandated a   | individuals cannot give or withhold their consent.  activity, and there is no opportunity for the individual to conse   |              |
|--|---|--------------|
| ppropriate individual, ensuring monetary lements which can only be associated the associated to an information is provided to an information in the associated the associat | that is collected is critical to associating comments with the ry payments are given as appropriate and other pay and prothrough use of PII.  individual when asked to provide PII data? Indicate | emotion      |
| Privacy Act Statement  |   |              |
| ] Other  | None  |              |
| ach Act Statement for each form,   | oon request, gives the affected individual a Privacy<br>format, or form letter used to collect personal data before a<br>s delivered in electronic format.  | sking for th |

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#### NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.

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