

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:

Perimeter 9

2. DOD COMPONENT NAME:

United States Air Force

3. PIA APPROVAL DATE:

12/17/20

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 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
 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.

The purpose of the system is to actively track individuals and base relatives of their COVID-19 test results and populate readiness data to medical staff and commanders of infected units. Perimeter 9 collects personal data like name, address, phone number as well as their COVID test date & test results. (Full list of PII in section 2A of this document)

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 PII is needed in order to specifically and accurately take accountability of the affected individual and potential individuals that may have come in contact. It is needed to identify these individuals.

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.

Patients may be able to deny giving PII to medical staff, but assuming they provide PII data, medical staff will input it into P9. Once input, the PII data can be seen by affected unit CCs and other with specific permission determined by admin. There is functionality in the tool to mask sensitive data from specific audiences/users, but that functionality is mutually exclusive to the consent of those providing their PII.

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.

All of the PII is used to identify the individual at a minimum extent. Any withheld PII would provide inefficient results to track COVID-19 positive patients.

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

This instruction requires the collection and or maintenance of information protected by the Privacy Act of 1974 as amended Authority: 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 7013, Secretary of the Army; 10 U.S.C. 8013, Secretary of the Navy; 10 U.S.C. 9013, Secretary of the Air Force; DoD Instruction 3001.02, Personnel Accountability in Conjunction with Natural or Manmade Disasters; Air Force Instruction 36-3802, Force Support Readiness Programs; Army Regulation 500-3, U.S. Army Continuity of Operations Program Policy and Planning; and E.O. 9397(SSN), as amended.

Purpose: The purpose of collecting this data is to safely and securely track COVID-19 amongst installations and provide accurate data to Unit and Installation Commanders to assess the health of their personnel.

Routine Uses: The routine uses of this information will only be accessible to Commanders with the correct certifications and rights, and inputted only by medical professionals. Sensitive information will not be accessible to members outside the DoD.

Disclosure: voluntary; there are no legal requirements to provide information. Individuals will not be penalized for not providing information.

SORN: The applicable System of Records Notice(s) DPR-39-DoD - DoD Personnel Accountability and Assessment System

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

- | | | |
|--|----------|--|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. | Commanders, Med Groups, Crisis Action Team Members |
| <input type="checkbox"/> Other DoD Components | Specify. | |
| <input type="checkbox"/> Other Federal Agencies | Specify. | |
| <input type="checkbox"/> State and Local Agencies | Specify. | |
| <input type="checkbox"/> 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. | |
| <input type="checkbox"/> 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)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Individuals | <input type="checkbox"/> Databases |
| <input type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

PII data is collected individually from the point of contact between medical staff and a potential COVID patient

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

- | | |
|---|--|
| <input checked="" type="checkbox"/> E-mail | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> Face-to-Face Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input checked="" type="checkbox"/> Telephone Interview |
| <input type="checkbox"/> Information Sharing - System to System | <input type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

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

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

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

(3) Retention Instructions.

T 41 - 09 R 05.00; Intervening Illness Statements Case File -- Destroy after 6 months.

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. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 7013, Secretary of the Army; 10 U.S.C. 8013, Secretary of the Navy; 10 U.S.C. 9013, Secretary of the Air Force; DoD Instruction 3001.02, Personnel Accountability in Conjunction with Natural or Manmade Disasters; Air Force Instruction 36-3802, Force Support Readiness Programs; Army Regulation 500-3, U.S. Army Continuity of Operations Program Policy and Planning; 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.

Data is imputed by military member. PRA is exempt.

SECTION 2: PII RISK REVIEW

a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- | | | |
|---|---|--|
| <input type="checkbox"/> Biometrics | <input checked="" type="checkbox"/> Birth Date | <input checked="" type="checkbox"/> Child Information |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Disability Information | <input checked="" type="checkbox"/> DoD ID Number |
| <input type="checkbox"/> Driver's License | <input type="checkbox"/> Education Information | <input type="checkbox"/> Emergency Contact |
| <input type="checkbox"/> Employment Information | <input type="checkbox"/> Financial Information | <input type="checkbox"/> Gender/Gender Identification |
| <input checked="" type="checkbox"/> Home/Cell Phone | <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Legal Status |
| <input checked="" type="checkbox"/> Mailing/Home Address | <input checked="" type="checkbox"/> Marital Status | <input checked="" type="checkbox"/> Medical Information |
| <input type="checkbox"/> Military Records | <input type="checkbox"/> Mother's Middle/Maiden Name | <input checked="" type="checkbox"/> Name(s) |
| <input checked="" type="checkbox"/> Official Duty Address | <input checked="" type="checkbox"/> Official Duty Telephone Phone | <input checked="" type="checkbox"/> Other ID Number |
| <input type="checkbox"/> Passport Information | <input checked="" type="checkbox"/> Personal E-mail Address | <input type="checkbox"/> Photo |
| <input type="checkbox"/> Place of Birth | <input checked="" type="checkbox"/> Position/Title | <input type="checkbox"/> Protected Health Information (PHI) ¹ |
| <input type="checkbox"/> Race/Ethnicity | <input checked="" type="checkbox"/> Rank/Grade | <input type="checkbox"/> Religious Preference |
| <input type="checkbox"/> Records | <input type="checkbox"/> Security Information | <input checked="" type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input checked="" type="checkbox"/> Work E-mail Address | <input type="checkbox"/> If Other, enter the information in the box below | |

Relatives that live on base, COVID test date and results

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

Social Security Justification Memo submitted DoD on 16 Dec 20.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(11) Legacy Systems Interface: Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information. These applications shall be rigorously scrutinized to determine the availability of some other means for conducting these transactions.

This is applicable because Perimeter 9 requires communication with other systems that the DoD has to ensure matching and checking information of the individuals, such as DBIDS. The rationale for collecting spousal and family member information that live on the installation is to ensure the safety of the members on the installation, as they may come in contact with them at local installation areas such as, commissary, gas station, etc.

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

Access to perimeter 9 database is restricted to only those who are approved to handle PII data including SSN. There are also safeguards designed into the tool to not prominently display the SSN data in the user interface dashboards, unless specifically requested. Right now, the only way to gain access to SSN stored in P9 is to (1) be cleared to access P9 and (2) drill down into individual patient information through several clicks. SSNs are not prominently displayed on the GUI dashboards, and those with permission based access can only see the SSN of patients within their unit and/or dependents of members in their unit

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?
If "No," explain.

- Yes No

The use of SSN as a requirement to interface with legacy systems must continue until such time as the DoD systems/applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information.

NOTE: Sections 1 above is 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 if they contain information that would reveal sensitive information or raise security concerns.