

## 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:**

Student Data Management System

**2. DOD COMPONENT NAME:**

United States Air Force

**3. PIA APPROVAL DATE:**

03/15/21

### 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.**

Activity/Purpose: (1) Unclassified course student training administration functions to include; data entry for all types of training; guidance for entering students into training according to the planned schedules; consistent administration of student actions from arrival through entry, graduation, and departure; and collecting, processing, and managing student accounting data to ensure data is accurate and consistently reported to the 37 TRW, AETC/IA, DSCA (to include Security Cooperation Officers world-wide). The system provides key decision makers with efficient output of current and historical training information used to gauge the effectiveness of the DOD English language training program. It also provides information for collection of reimbursable funds for IMET and FMS.

(2) Human resource records maintained to process staff position realignments, security clearance documentation for mission deployment/mobility requirements.

(3) Staff Electronic Data Interchange Personal Identifier (EDIPI) used in identifying and tracking access control mechanisms for the system.

A complete list of PII collected is identified on Section 2A of this PIA.

**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)

(1) Collected information is used to match students with their training information. Collected information is used to ensure all trainees meet required training objectives and to provide real-time accountability.

(2) Staff information is collected for administrative use in support of deployment/mobility requirements; administratively track system authorization requirements; and used to authenticate users.

**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.

(1) Student data is received electronically from Fort Sill for US military students and entered by the country program manager. International Military student information is entered from their international travel orders.

(2) Staff Human Resource data is collected from their In-Processing forms and the DD2875 System Access Authorization Request (SAAR) is used to collect EDIPI for access authorization and authentication purposes.

**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.

(2) Staff data is manually entered into the system from existing administrative documents. If the user does not give consent, then they are either not hired, or allowed access to mission systems and therefore unable to perform their jobs.

**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

“The information herein is FOR OFFICIAL USE ONLY (FOUO) information which must be protected under the Freedom of Information Act (5 U.S.C 552) and/or the Privacy Act of 1974 (5 U.S.C. 552a). Unauthorized disclosure or misuse of this PERSONAL INFORMATION may result in disciplinary action, criminal and/or civil penalties.”

**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.
- Other DoD Components      Specify.
- 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.
- 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

(1) Data is received electronically via emailed flat files from Fort Sill for US military students. International military student information is gathered from their international travel orders located within the Defense Security Cooperation Agency managed SANWeb and entered by their country program manager. Information is provided by the individuals as needed to update information already collected.

(2) Staff Human Resource data is collected from their In-Processing forms and the DD2875 System Access Authorization Request (SAAR) is used to collect EDIPI for access authorization and authentication purposes.

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

- E-mail       Official Form (Enter Form Number(s) in the box below)
- Face-to-Face Contact       Paper
- Fax       Telephone Interview
- Information Sharing - System to System       Website/E-Form
- 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.

**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.

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

(3) Retention Instructions.

T 36 - 37 R 05.00 - Foreign Trainees below HQ USAF -- Destroy 2 years after completion of project.  
T 36 - 38 R 05.00 - Other Training Progress Records --Destroy 10 years after individual completes or discontinues a training course.  
Note: Among the disposition cited in this field, the one with the longest retention time will be used on the system's records data

**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.

DLIELC's authority to operate and maintain SDMS is derived from 10 U.S.C. 9013, Secretary of the Air Force: powers and duties; E.O. 9397 (SSN); as implemented by Air Force Instruction AFI 36-4003, (Managing the Defense English Language Program) and Air Education and Training Command Instruction AETCI 36-2651 (Basic Military and Technical Training).

**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.

Does not collect from 10 or more members of the public within 12-month period. Information is bulk loaded by country program manager or obtained from other sources.

**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 type="checkbox"/> Child Information   |
| <input checked="" type="checkbox"/> Citizenship           | <input type="checkbox"/> Disability Information                                      | <input checked="" type="checkbox"/> DoD ID Number                                      |
| <input checked="" 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 checked="" 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 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 type="checkbox"/> Official Duty Telephone Phone                               | <input checked="" type="checkbox"/> Other ID Number                                    |
| <input checked="" 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) <sup>1</sup>               |
| <input type="checkbox"/> Race/Ethnicity                   | <input checked="" type="checkbox"/> Rank/Grade                                       | <input type="checkbox"/> Religious Preference  |
| <input type="checkbox"/> Records                          | <input checked="" 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 checked="" type="checkbox"/> If Other, enter the information in the box below |  |

Foreign Identification Number (FIN), This number is generated by Defense Manpower Data Center (DMDC) when an international student is issued a Common Access Card (CAC) for identification. This number is maintained in SDMS and by sponsoring Security Cooperation Officers to be used in instances involving medical facilities, OSI, FBI, Homeland Security, etc; Pseudo Social Security Number (PSSN), this number is maintained in SDMS for use by the Air Force. The number is on the International Travel Orders (ITO) of foreign students sponsored by the Air Force Security Assistance Training and used for tracking international students through various training locations. PSSN is not used by other services sponsoring international students (Army, Navy, or USMC) on ITOs.

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.

SSN Justification sent to DoD on 03 Nov 2020

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

The acceptable uses cited are: (3) Security Clearance Investigation or Verification; (9) Foreign Travel; and (12) Operational Necessity. The Social Security Numbers (SSN) - This number is maintained in SDMS for use by the Army pre-basic training unit stationed with DLIELC. It is their primary means of linking students to training with Army systems. Pseudo Social Security Number (PSSN). This number is maintained in SDMS for use by the Air Force. The number is on the International Travel Orders (ITO) of foreign students sponsored by the Air Force Security Assistance Training and used for tracking international students through various training locations. PSSN is not used by other services sponsoring international students (Army, Navy, or USMC). Foreign Identification Number (FIN). This number is generated by Defense Manpower Data Center (DMDC) when an international student is issued a Common Access Card (CAC) for identification. This number is maintained in SDMS and sponsoring Security Cooperation Officers to be used in instances involving medical facilities, OSI, FBI, Homeland Security, etc. The SSN collected for staff personnel is maintained in SDMS for processing staff position realignments and for mission deployment/mobility requirements.

(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".

DLIELC has evaluated the risk associated with the use of the SDMS and identified steps to reduce the future use of the SSN and to protect where the use is still required. The use of SSN as a requirement, allowed by the acceptable uses cited above, 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.

(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

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.