



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Training Requirements And Information Network extended (TRAINext)

Defense Contract Audit Agency (DCAA)

### **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.
- (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

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

**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.**

**SECTION 2: PIA SUMMARY INFORMATION**

**a. Why is this PIA being created or updated? Choose one:**

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

**b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?**

- Yes, DITPR**      Enter DITPR System Identification Number
- Yes, SIPRNET**      Enter SIPRNET Identification Number
- No**

**c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?**

- Yes**
- No**

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

**d. 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 should be consistent.

- Yes**
- No**

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.  
Consult the Component Privacy Office for additional information or  
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

**Date of submission for approval to Defense Privacy Office**

Consult the Component Privacy Office for this date.

**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.

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**

**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.

5 U.S.C. 2105, Employee.

**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.

TRAINext is DCAA Learning Target Learning Management System (branded as TRAINext), which provides the administrative functions, an SQL Server database and a web front end. TRAINext is a web-based application written in ColdFusion and is hosted on a Windows server, located in Millington, TN. The system will provide many training related functions, including a personalized development plan for all DCAA employees and contractors, and SCORM compliance. It will allow employees, supervisors and training coordinators to track Continuing Professional Education (CPE) compliance.

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

Privacy of PII is of critical importance to the employees and the DCAA. Managing the risk to prevent the release of PII is the responsibility of the system administrators, file custodians, business process owners and the individual employees who access and utilize that information. The risks are mitigated by the application of a strict access security model and training. The following briefly describes steps taken in more detail:

Access to the information is controlled through a strictly enforced role based security model. The number of necessary users with access to the records that contain PII is kept to a minimum by close monitoring of the role allocation.

Administrative access to the application is required to modify the roles based security model. Physical security to the DCAA owned and managed servers is only allowed after access to the complex (grounds), building, and cipher locked door and requires prior authorization from the Data Center Manager. Server administrators possess a Secret clearance as per DoD policy. Access to the system is provided on a need to know basis, and via a valid CAC and Public Key Infrastructure (PKI) enabled authentication. All employees (to include contractors) receive mandatory DoD sponsored Privacy Act and PII protection and spillage training annually to help safeguard the PII.

DCAA provides mandatory Information Awareness training for all employees and all contractors. This training includes safe handling procedures that cover receiving, viewing, printing, forwarding, storing, and shredding of PII data.

**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.**

**Within the DoD Component.**

Specify.

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

N/A

- Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

N/A

- Other** (e.g., commercial providers, colleges).

Specify.

**i. Do individuals have the opportunity to object to the collection of their PII?**

**Yes**

**No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Users have the opportunity to object at the time of collection.

(2) If "No," state the reason why individuals cannot object.

**j. 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.

Individuals have the opportunity to give or withhold their consent at the time of collection.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

**k. What information is provided to an individual when asked to provide PII data?** Indicate all that apply.

- |   |  |
|---|--|
| <input type="checkbox"/> <b>Privacy Act Statement</b> | <input type="checkbox"/> <b>Privacy Advisory</b> |
| <input checked="" type="checkbox"/> <b>Other</b>      | <input type="checkbox"/> <b>None</b>             |

Describe each applicable format.

Any PII data that will be collected would be by a Federal Government Form or document that contains a Privacy Act statement or Advisory In accordance with the applicable regulations.

**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.**