

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:

Army Vantage-SIPR

2. DOD COMPONENT NAME:

Under Secretary of Defense for Acquisition, Technology and Logistics

3. PIA APPROVAL DATE:



ASA(ALT) / PEO EIS

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 Vantage system provides senior leaders access to "All Army Data" in order to better inform strategic decisions by displaying past, current and future total force data, producing predictive analytics and facilitating real-time or near real-time decision making displays. The solution will ingest, integrate, analyze and visualize information from across the total Army. It will apply machine learning and artificial intelligence to generate insights unavailable in siloed systems. Targeted users include senior leaders at the Headquarters Department of the Army (HQDA) Secretariat, the Army Staff and at designated leaders in the chain of command of Army Commands (ACOMs), Army Service Component Commands (ASCCs), Direct Reporting Units (DRUs) and Field Operating Agencies (FOAs). Ultimately, ALD will provide insight into the Army's execution of its primary Title 10/32 functions to organize, man, train, equip, and sustain forces in support of the National Military Strategy. The Vantage has a NIPR and SIPR instances but only a SIPR authorization to operate with approved one-way Cross domain solution covering both environments. The System will have the classified overlay applied which is more stringent than the Privacy overlay protecting its data.

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 Vantage system needs PII to link an individual with the units, equipment, training, installation and events that occur over a career for trend and predictive analysis, and to support drill down to individual records by authorized personnel.

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.

Vantage is not the authoritative source for PII. The individual does not participate in the PII collection process for this application. The PII is obtained from multiple Army and DoD information systems.

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.

Vantage is not the authoritative source for PII. The individual does not participate in the PII collection process for this application. The PII is obtained from multiple Army and DoD information systems.

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

Vantage is not the authoritative source for PII. The individual does not participate in the PII collection process for this application. The PII is obtained from multiple Army and DoD information systems.

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
- Other DoD Components
- Other Federal Agencies
- State and Local Agencies

Specify.

Specify.

Specify.

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.)

Palantir Technologies - W15QKN-18-9-6003;

3.0 OVERALL TECHNICAL REQUIREMENTS
The following are minimum requirements that will be included in the platform:

3.1 Data Integration:
...
3.1.2 The data must be protected in accordance with applicable laws, regulations and policies governing Personally Identifiable Information (PII), Protected Health Information (PHI) and protection of the solution will be capable of:

3.1.2.1 Organizing and integrating data on NIPRNet and SIPRNet into a SIPRNet-hosted solution.

3.1.2.2 Data-agnostic data integration, including structured, unstructured, and semi-structured data integration capabilities at terabyte scale.

3.1.2.3 Data “pull” jobs through a RESTful web API or direct connections that refresh data and can be run manually or on a schedule.

5.0 GENERAL REQUIREMENTS
5.1 Security:
...
5.1.4 The Contractor shall protect access and release of Personally Identifiable Information (PII) and Personal Health Information (PHI). All Contractor personnel with access to the Vantage solution and the PII / PHI data shall complete all required annual Privacy Act and Health Insurance Portability and Accountability Act (HIPAA) training conducted online through Army Records Management & Declassification Agency (RMDA) <https://www.rmda.army.mil/privacy/RMDA-PO-Training.html> to meet the above requirements.

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
- Existing DoD Information Systems
- Other Federal Information Systems
- Databases
- Commercial Systems

Army Civilian Personnel System (ACPERS) SORN# A0690-200 DAPE
Army Safety Management Information System-Revised (ASMIS-R) SORN# A0385-10/40 ASO
Army Training Management System (ATRRS) SORN# A0351 DAPE
Defense Readiness Reporting System – Army (DRRS-A SIPR/NIPR) SORN# DPR 30 DoD

Department of the Army Photo Management Information System (DAPMIS) SORN# A0600-8-104b AHRC
 Deployed Theater Accountability System (DTAS-NIPR/SIPR) SORN# A0715-9a G1/SORN#A0715-9a G1
 Electronic Military Personnel Office (eMILPO) SORN#A0600-8-104 AHRC
 Electronic Profile (eProfile) SORN# A0040-66b DASG and A0351A DASG
 Interactive Personnel Electronic Management System (iPERMS) SORN# A0600-8-104b AHRC
 Integrated Total Army Personnel Database (iTAPDB) SORN# A0600-8-104 AHRC
 Keystone - Request (KEYSTONE-REQ) SORN# A0680-31b AHRC
 Keystone - Retain (KEYSTONE-RET) SORN# A0680-31b AHRC
 Medical Protection System (MEDPROS) SORN# A0040-66b DASG and A0351A DASG
 Mobilization and Deployment Information System (MDIS) SORN# A0500-5 DAMO
 Professional Filler System (PROFIS) SORN# A0040-66b DASG and A0351A DASG
 Total Army Personnel Database – Active Enlisted (TAPDB-AE) SORN# A0600-8-104 AHRC
 Total Army Personnel Database – Active Officer (TAPDB-AO) SORN# A0600-8-104 AHRC
 Total Army Personnel Database – Guard (TAPDB-G) SORN# A0600-8-104 AHRC
 Total Army Personnel Database – Reserve (TAPDB-R) SORN# A0600-8-104 AHRC

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

- | | |
|---|--|
| <input 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 type="checkbox"/> Telephone Interview |
| <input checked="" 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 DUSDC 01 Defense Repository for Comn

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.

***Note ***ALD SORN in Review

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. Schedule Under Development

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

(3) Retention Instructions.

Unscheduled, Retain until disposition instructions are published, treat as Permanent do not DESTROY/DELETE.

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. 7013, Secretary of the Army; National Defense Authorization Act for Fiscal Year 2018, Sec. 911. Policy on Treatment of Defense Business System Data Related to Business Operations and Management and Sec. 912. Transparency of Defense Management Data. 10 U.S.C. 2222, Defense business systems: architecture, accountability, and modernization, AR 25-1, Army Information Technology, 25 June 2013. AR 5-1, Management of Army Business Operations, AR 525-30, Army Strategic Readiness, AR 350-2, Operational Environment and Opposing Force Program, AR 525-29, Army Force Generation, AR 525-93, Army Deployment and Redeployment, AR 500-3, U.S. Army Continuity of Operations Program Policy and Planning, AR 500-5, Army Mobilization, AR 570-4, Manpower Management.

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.

In accordance with DOD Manual 8901.01, Volume 2, para 2 (b) Vantage does not require a OMB control number because it will not collection information from members of the public.