

## 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:**

TAP-XXI - SOLDIER FOR LIFE - TRANSITION ASSISTANCE PROGRAM XXI

**2. DOD COMPONENT NAME:**

United States Army

**3. PIA APPROVAL DATE:**

08/25/20

US Army Deputy Chief of Staff for Personnel / Human Resources Command (HRC)

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)   |

**b. The PII is in a:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" type="checkbox"/> Existing DoD Information System    | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 Soldier For Life - Transition Assistance Program (SFL-TAP) XXI (TAP-XXI) application provides an interactive, multimedia approach to pre-separation counseling and job assistance training. The application uses full motion video, graphics, and sound to train clients and schedules clients for classroom-type instruction. TAP-XXI also provides office automation support for clients. It integrates a complete range of transition services and benefits for Soldiers, Department of Army civilian employees, and their family members as they transition from Active Federal Service. TAP-XXI is a web-based, three-tiered application with a centralized database for all SFL-TAP sites. The user interface is browser based, and the application is based on a storefront intranet model to provide access from within SFL-TAP centers. All users access the application via Internet Explorer,. Aside from JavaScript validation of data entry fields, there is no application processing on the desktops located at SFL-TAP sites.

PII collected includes personal, contact, employment, and military record 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)

Verification, identification, and data matching: To verify eligibility to receive services and to facilitate pre-separation counseling, and post-service employment.

Administrative use.

**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.

TAP Completion is required by law (Veterans Opportunity to Work Act of 2011). PII is also collected from existing information systems where individuals are not involved in the process. However, Soldiers implicitly consent to capture and use of their information at the time of employment or enlistment in the Army, at which time they are provided a Privacy Advisory. If the user does not agree with the Privacy Statement, they would not click the "I Accept" button

**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.

Soldiers implicitly consent to capture and use of their information at the time of employment or enlistment in the Army, at which time they are provided a Privacy Advisory.

**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

DD Form 2648 contains the following Privacy Act Statement:

"AUTHORITY: 10 U.S.C. 1142, Preseparation Counseling; transmittal of medical records to Department of Veterans Affairs, and E.O. 9397 (SSN) as amended.

PRINCIPAL PURPOSE(S): To record preseparation services and benefits requested by and provided to Service members; to identify preseparation (or transition) counseling areas of interest as a basis for development of an Individual Transition Plan (ITP). The signed preseparation counseling checklist will be maintained in the Service member's official personnel file. Title 10 U.S.C. 1142 requires that not later than 90 days before the date of separation, for anticipated losses, preseparation counseling for Service members be made available. For unanticipated losses, preseparation counseling shall be made available as soon as possible.

ROUTINE USE(S): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. Applicable Blanket Routine Use(s) are: Law Enforcement Routine Use, Congressional Inquiries, Disclosure to the Department of Justice for Litigation Routine Use, Disclosure of Information to the National Archives and Records Administration Routine Use, and Data Breach Remediation Purposes Routine Use. To the Department of Veterans Affairs and other federal agencies for the purpose of providing transition assistance and available benefits to the eligible Service member. The DoD Blanket Routine Uses set forth at the beginning of the Office of the Secretary of Defense (OSD) compilation of systems of records notices may apply to this system. The complete list of DoD Blanket Routine Uses can be found online at <http://dpcid.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>. The applicable system of records notice is: DMDC 01, Defense Manpower Data Center Data Base. The SORNs may be found at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DODwideSORNArticleView/tabid/6797/Article/570563/dmdc-01.aspx>

DISCLOSURE: Disclosure is voluntary however it may not be possible to initiate preseparation counseling and other transition assistance services or develop an Individual Transition Plan (ITP) for a Service member if the information is not provided."

PII is also collected from existing information systems where individuals are not involved in the process, and therefore neither a Privacy Act Statement nor a Privacy Advisory can be provided.

**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.

Army Inspector General; Army Audit Agency; US Army Criminal Investigation Command; US Army Intelligence and Security Command; Provost Marshal General; and Assistant Secretary of the Army for Financial Management and Comptroller.

Other DoD Components

Specify.

Defense Manpower Data Center (DMDC), Department of Defense Inspector General, Defense Criminal Investigative Service; US Air Force; US Marine Corps; and US Navy.

Other Federal Agencies

Specify.

National Guard Bureau; Department of Labor; Department of Veterans Affairs; and Veterans Administration.

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.

HRC contracts contain language addressing the applicable FAR privacy clauses, acknowledge the sensitivity of PII and describe the importance of protecting and maintaining the confidentiality and security of an individual's PII in the associated task orders. The contractual language keys on training as a fundamental element in creating awareness and understanding of PII and why it is important to control and safeguard. The language also stresses securing PII material and equipment housing PII at the end of a work day. Contractual language directs and requires each contract employee in support of this system to have a valid Secret clearance prior to working on the program. Contracts specifically state that contractor personnel shall adhere to the Privacy Act, Title 5 of the U.S. Code, Section 552A and applicable DOD, Army, and HRC rules and regulations.

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

PII is collected directly from individuals through submission of DD Form 2648 via the TAP-XXI website and from an existing DoD information system (DoDTAP).

**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)

DD Form 2648

**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

A0600o AHRC

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

N1-AU-00-0012 / RN 600

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

(3) Retention Instructions.

RN 600o Event is after 90 days inactivity for individual personnel record. Keep in CFA until event occurs and then until no longer needed for conducting business, but not longer than 6 years after the event, then destroy. NOTE: Use RN 25-1kkk for source/input records, RN 25-1mmm for system documentation and specifications, RN 25-1lll for system administrative reports, and RN 25-1nnn for backups. and RN 25-1ppp for 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.

5 United States Code (USC) 301, Departmental Regulations; 10 USC 1142, Pre-separation counseling, transmittal of medical records to Department of Veterans Affairs; 10 USC 1143, Employment assistance; 10 USC 3013, Secretary of the Army; 10 USC Chapter 58, Benefits and Services for Members; Department of Defense Directive 1332.35, Transition Assistance For Military Personnel; Army Directive 2014-18, Army Career and Alumni Program; HQDA EXORD 054-12, Transition; The VOW to Hire Heroes Act of 2011; and Executive Order 9397 as amended (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.

System does not collect PII from 10 or more members of the general public in a one-year period.