



NATIONAL SECURITY EDUCATION PROGRAM (NSEP)

PRIVACY IMPACT ASSESSMENT (PIA)

for the

NATIONAL LANGUAGE SERVICE CORPS (NLSC) PILOT

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Introduction

The E-Government Act of 2002 (Public Law 107-347,44 U.S.C., CH 46) requires all Federal government agencies to conduct Privacy Impact Assessments (PIA) for all new or substantially changed technology that collects, maintains, or disseminates personally identifiable information.

The Office of Management and Budget (OMB) Memorandum 03-22, Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 (dated 26 Sep 03), Department of Defense (DoD) Privacy Impact Assessment (PIA) Guidance Memorandum on Publishing Impact Assessments provides information to agencies and the DoD on Implementing the provisions.

E-Government Act Section 208 Implementation Guidance

A PIA is a process for determining the risks and effects of collecting, maintaining, and disseminating information in identifiable form in an electronic information system, and for identifying and evaluating protections and alternative processes to mitigate the impact to privacy of collecting information in identifiable form.

The E-Government Act requires that agencies conduct a PIA before (i) developing or procuring information technology that collects, maintains, or disseminates information that is in an identifiable form or (ii) initiating a new electronic collection of information that will be collected from ten or more persons, other than agencies, instrumentalities, or employees of the Federal Government, and will be maintained, or disseminated in an identifiable form, using information technology.

PIAs are conducted to ensure that there is no collection, storage, access, use, or dissemination of identifiable information from or about members of the general public and businesses that is not needed or authorized, and that identifiable information that is collected is adequately protected. PIAs may address issues relating to the integrity and availability of data handled by a system, to the extent these issues are not already adequately addressed in a System Security Plan.

Definitions:

Information in identifiable form: Information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

Information technology (IT): As defined in the Clinger-Cohen Act, any equipment, software or interconnected system or subsystem that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information.

***NATIONAL LANGUAGE SERVICE CORPS PILOT PRIVACY IMPACT
ASSESSMENT (PIA)***

1. **Department of Defense (DoD) Component:** National Security Education Program (NSEP), Defense Human Resources Activity (DHRA), Under Secretary of Defense for Personnel and Readiness.
2. **Name of Information Technology (IT) System:** Operations Support System for the National Language Service Corps (NLSC) Pilot.
3. **Budget System Identification Number (SNAP-IT Initiative Number):**
[TBD]
4. **System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR)):** [TBD]
5. **IT Investment (OMB Circular A-11) Unique Identifier (if applicable):**
[TBD]
6. **Privacy Act System of Records Notice Identifier (if applicable):** DHRA 05. The System of Records Notice (SORN) is being developed in parallel to this PIA.
7. **OMB Information Collection Requirement Number (if applicable) and Expiration Date:** The OMB information collection requirement number is being applied for and will be placed in this section upon OMB approval.
8. **Type of authority to collect information (statutory or otherwise):** 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 131, Office of the Secretary of Defense; DoD Directive 5124.2, Under Secretary of Defense for Personnel and Readiness; 50 U.S.C 403-1b, War and National Defense; Public Law 109-364, Sec. 944, Administration of pilot project on Civilian Linguist Reserve Corps; and Public Law 108-487, Sec. 613, Pilot Project on Civilian Linguist Reserve Corps.
9. **Provide a brief summary or overview of the IT system (activity/purpose, present life-cycle phase, system owner, system boundaries and interconnections, location of system and components, and system backup):** The Operations Support System for the NLSC Pilot is a web-based portal to allow U.S. citizens with language and special skills to self-identify these skills for the purpose of temporary employment on an intermittent work schedule or service opportunities in the federal or state government during periods of national need or emergency. The information will be used to identify and contact NLSC Charter Members and prospective Charter Members in times of need. The collection will allow preliminary background checks prior to any final appointment in the NLSC of only those individuals

the NLSC expects to employ temporarily during the Pilot Program. Background checks are not expected for the remaining Charter Members. The system owner is the Director, National Security Education Program, 1101 Wilson Blvd., Suite 1210, Arlington, VA 22209-2248. The system physically resides at American Data Technology, Inc., PO Box 12892, Research Triangle Park, NC 27709.

10. **Describe what information in identifiable form will be collected and the nature and source of the information (e.g., names, social security numbers, gender, race, other component IT systems, IT systems from agencies outside DoD, etc.):** The information collected is from individuals to support the mission of the NLSC Pilot. The categories of information collected are: Full name; address, city; state; zip code; and where available e-mail address; telephone number; education level; foreign language(s) spoken, foreign language proficiency levels, and English proficiency levels. Upon submission of completed forms, a unique identifier will be assigned to each participant in this program in lieu of using SSN.
11. **Describe how the information will be collected (e.g., via the Web, via paper-based collection, etc):** Information will be collected from individuals via paper-based collection and via Internet portal.
12. **Describe the requirement and why the information is identifiable form is to be collected:** The mission of the NLSC Pilot is to provide and maintain a readily available civilian corps of certified volunteers in languages determined to be important to the security and welfare of the nation. The NLSC is established as a Pilot program that, upon becoming fully operational, will fill any gaps that may exist between federal and state requirements and available language skills, providing the capabilities for meeting short-, mid-, and long-term requirements through the identification and warehousing of expertise and skills in current and potential critical languages. These language capabilities serve the broader interests of the Federal departments and their agencies as well as needs of the States.
13. **Describe how the information in identifiable form will be used (e.g., to discharge a statutory mandate, to execute a Component program, etc.):** The NLSC Pilot maintains a readily available roster of volunteers with certified language skills that are available in time of war, national emergency, or other national needs.
14. **Describe whether the system derives or creates new data about individuals through aggregation:** The Operations Support System for the NLSC Pilot does not derive or create new data about individuals through aggregation.

15. **Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.):** The information will only be shared within the National Language Service Corps by program personnel who require the records in the performance of their official duties.
16. **Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent.**

Individuals provide information voluntarily. Disclosure is printed on DD Forms X558, X559, X560, X561; however, failure to provide information may result in non-enrollment in the NLSC Pilot, and refusal to grant access to Charter Member areas of the Operations Support System for the NLSC Pilot.

17. **Describe any information that is provided to an individual and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of delivery (e.g., written, electronic, etc.), regarding the determination to collect the information in identifiable form.**

Privacy Act Statements, as required by 5 U.S.C. 552a(e)(3), are printed on DD Form X558, X559, X560, X561, and provided at the collection point. The statement provides the following: collection purpose, authorities, external uses, nature of the program, the name and number of the Privacy Act System of Records Notice governing the collection, and an electronic link to the system notice. The statement is included on paper and electronic collection forms.

18. **Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form.**

Access to personal information is restricted to NLSC personnel who require the records in the performance of their official duties. Access to personal information is further restricted by the use of passwords that are changed periodically. Physical entry is restricted by the use of locks, guards, and administrative procedures.

19. **Identify where the IT system or collection of information will require a System of Records notice as defined by the Privacy Act of 1974 and as implemented by DoD Directive 5400.11, "DoD Privacy Program," November 11, 2004. If so, and a System Notice has been published in the Federal Register, the Privacy Act System of Records Identifier must be**

listed in Question 6 above. If not yet published, state when publication of notice will occur.

The System of Records Notice is currently being developed and will be published upon approval of the OSD/JS Privacy Office.

20. **Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures.**

The security features of the NLSC Pilot provide a level of protection that meets or exceeds the minimal requirements of DoD Directives 5400.11 and 8500.01E. The concept of identification and authentication "layered protection" is used to keep unauthorized users out of the Operations Support System for the NLSC Pilot. All personnel granted access must participate in a security training and awareness program. This program consists of both initial security training and annual refresher training.

THREATS: Access, storage and transmission of information protected under the Privacy Act of 1974 are subject to threats, including, but not limited to: malware, sniffing, spoofing, and physical assault, as well as various natural disasters and failures which impact either the protected infrastructure or the services upon which the infrastructure depends. All of these imperil, to one extent or another, information availability, integrity, and confidentiality

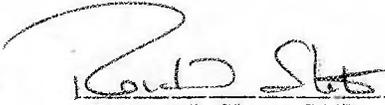
DANGERS: Individuals provide information voluntarily. There are no known dangers in providing notice of the collection or allowing an individual to object/consent. Therefore, individuals are given this opportunity at time of data collection via a Privacy Act Statement. Individuals are free to raise objections if new threats are perceived.

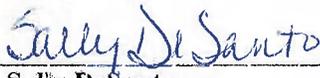
RISK	MITIGATION	ASSESSMENT (HIGH, MEDIUM, LOW)
<p>Unauthorized disclosure of recruitment and employment information on the ability to market and hire personnel.</p>	<p>Paper and electronic media containing information is restricted to those who require the data in the performance of their official duties. Access to information is further restricted by the use of passwords that are changed periodically. Physical entry is restricted by the use of locks, guards, and administrative procedures.</p> <p>In most cases, unauthorized disclosure of staff recruitment and employment information will have only a limited adverse effect on NLSC Pilot operations, assets, or individuals.</p>	<p>LOW</p>
<p>Unauthorized modification or destruction of information for recruitment and employment.</p>	<p>Periodic assessment of security controls related to modification or destruction of information are performed.</p> <p>Although there can be serious short-term effects for individuals, the effects of modification or deletion of staff recruitment and employment information are generally limited with respect to NLSC Pilot capabilities or assets.</p>	<p>LOW</p>

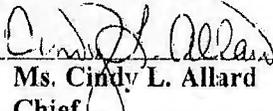
RISK	MITIGATION	ASSESSMENT (HIGH, MEDIUM, LOW)
Delay in recruitment and employment due to the availability of the data supporting the NLSC Pilot.	Data is maintained in paper and electronic media. The NLSC Pilot is designed to mature the effectiveness of staff recruitment and employment processes. Reasonable delays are tolerable.	LOW

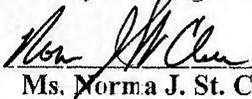
21. **State classification of information/system and whether the PIA should be published or not. If not, provide rationale. If a PIA is planned for publication, state whether it will be published in full or summary form.**

The NLSC Pilot security classification is *Low* as determined from analysis of NLSC Pilot business activities and mapping of types of information and information systems to security categories — *Staff Recruitment and Employment Information Type* – in the NIST SP 800-60 Volume II. The PIA should be published in full.

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