



PRIVACY IMPACT ASSESSMENT (PIA)

For the

National Security Education Program (NSEP) Scholar and Fellow Support System

National Security Education Program (NSEP), Defense Human Resources Activities
(DHRA), Undersecretary of Defense for Personnel and Readiness

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

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

0704-0368

Enter Expiration Date

October 31, 2014

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.

50 U.S.C., Chapter 37, the David L. Boren National Security Education Act of 1991; DoDI 1025.02, National Security Education Program; DoDI 1025.6, National Security Education Program (NSEP) Service Agreement; and E.O. 9397 (SSN), as amended.

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.

To provide U.S. citizens with the resources and encouragement needed to acquire skills and experiences in areas of the world critical to the future security of nations in exchange for a commitment to seek work in the Federal Government. This will enable the National Security Education Program (NSEP) to select qualified applicants to be awarded Boren Scholarships, Boren Fellowships, and English for Heritage Language Speakers program Scholarships.

A record is maintained in the system, NSEPnet, for each student who receives an award. The progress that each student makes toward fulfilling their federal service obligation is tracked within this system."

Routine uses of records maintained in the system, including categories of users and the purposes of such uses: Delete entry and replace with "In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, as amended, the records herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

To authorized federal hiring officials for the purpose of recruiting of NSEP award recipients into federal service, and assisting NSEP award recipients in fulfilling their Congressionally-mandated service requirement.

To the Boren Forum, an independent 501(c)3 NSEP alumni organization to confirm the name, award year, and type of award of NSEP award recipients.

Disclosure to consumer reporting agencies:

Disclosures pursuant to 5 U.S.C. 552a(b)(12) may be made from this system to consumer reporting agencies as defined in the Fair Credit Reporting Act (14 U.S.C. 1681a(f)) or the Federal Claims Collection Act of 1966 (31 U.S.C. 3701(a)(3)). The purpose of this disclosure is to aid in the collection of outstanding debts owed to the Federal Government, typically to provide an incentive for debtors to repay delinquent Federal Government debts by making these debts part of their credit records.

The disclosure is limited to information necessary to establish the identity of the individual, including name, address, and taxpayer identification number (SSN); the amount, status, and history of the claim; and the agency or program under which the claim arose for the sole purpose of allowing the consumer reporting agency to prepare a commercial credit report.

The DoD Blanket Routine Uses published at the beginning of the Office of the Secretary of Defense compilation of systems of records notices may apply to this system.

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

PRIVACY RISKS (Collection, Use, and Sharing): 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.

The security features of the NSEP Scholar and Fellow Support System 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 NSEP Scholar and Fellow Support System.

In order to establish layered protection of information, 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 every 180 days. Physical entry is restricted by the use of locks, guards, and administrative procedures. PII is encrypted when transmitted electronically. Contract officers are required to incorporate all appropriate Privacy Act clauses and contractor personnel are required to sign non-disclosure documents holding them to all provisions of the Privacy Act.

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. Information will be used by NSEP personnel who require the records in the performance of their official duties.

Other DoD Components.

Specify. Authorized DoD hiring officials, to facilitate the recruiting of NSEP award recipients into federal service for the purpose of fulfilling NSEP's mission.

Other Federal Agencies.

Specify. Authorized federal hiring officials, to facilitate the recruiting of NSEP award recipients into federal service for the purpose of fulfilling NSEP's mission.

State and Local Agencies.

Specify.

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

Specify. The prime contractor charged with hosting and data safeguarding is Advanced Software Systems, Inc. (ASSYST), which is required to meet DoD Information Assurance Certification and Accreditation Process (DIACAP) standards in accordance with DoDI 8510.01.

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

Specify. The Boren Forum, the non-profit NSEP alumni organization, to confirm the name, award year, and type of award of NSEP award recipients to consumer reporting agencies.

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.

Voluntary; however, failure to furnish the requested information may result in ineligibility to receive an NSEP award.

(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.

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

NSEP awards are merit-based Scholarships and Fellowships that carry a service obligation. NSEP requires all elements named above in order to, first, award the most competitive applicants. Data are also used to target outreach and recruitment in subsequent application cycles. Most importantly, NSEP must track and maintain up to date records on individual recipients to ensure compliance with the legislatively-mandated service obligation.

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

- Privacy Act Statement** **Privacy Advisory**
 Other **None**

Describe each applicable format.

The Privacy Act Statement provided for the online application reads:

Authority: 50 U.S.C., Chapter 37, the David L. Boren National Security Education Act of 1991; DoD Instruction (DoDI) 1025.02, National Security Education Program; DoDI 1025.6, National Security Education Program (NSEP) Service Agreement; and E.O. 9397 (SSN), as amended.
Principle Purposes: To determine recipients of National Security Education Program awards.
Routine Use: None.

Disclosure: Voluntary; however, failure to furnish the requested information may result in ineligibility to receive an NSEP award.

The Privacy Act Statement printed on DD Form 2752 reads:

Authority: 50 U.S.C., Chapter 37, the David L. Boren National Security Education Act of 1991; DoD Instruction (DoDI) 1025.02, National Security Education Program; DoDI 1025.6, National Security Education Program (NSEP) Service Agreement; and E.O. 9397 (SSN), as amended.

Principal Purpose(s): To establish a service agreement for all individuals receiving NSEP scholarships or fellowships. The applicable SORN is DHRA 09 located at <http://privacy.defense.gov/notices/osd/DHRA09.shtml>.

Routine Use(s): In the case of a recipient in default of a service agreement, information may be disclosed to consumer reporting agencies; and to other governmental agencies to facilitate collection of amounts owed the government. The DoD 'blanket routine uses' found at http://privacy.defense.gov/blanket_uses.shtml also apply.

Disclosure: Voluntary; however, failure to furnish the requested information will result in NSEP not being able to finalize your application for a scholarship or fellowship. Social Security Number is requested to facilitate reporting to the Department of Treasury and the consumer reporting agencies in the event of default.

The Privacy Act Statement on DD Form 2753 reads:

Authority: 50 U.S.C., Chapter 37, the David L. Boren National Security Education Act of 1991; DoD Instruction (DoDI) 1025.02, National Security Education Program; DoDI 1025.6, National Security Education Program (NSEP) Service Agreement; and E.O. 9397 (SSN), as amended.

Principal Purpose(s): To document recipient's status and compliance in fulfilling the service requirement. The applicable SORN is DHRA 09 located at <http://privacy.defense.gov/notices/osd/DHRA09.shtml>.

Routine Use(s): In the case of a recipient in default of a service agreement, information may be disclosed to consumer reporting agencies; and to other governmental agencies to facilitate collection of amounts owed the government. The DoD 'blanket routine uses' found at http://privacy.defense.gov/blanket_uses.shtml also apply.

Disclosure: Voluntary; however, failure to furnish the requested information may result in your being required to reimburse the U.S. Treasury for the total cost of your scholarship or fellowship plus interest. A truncated SSN (last four digits of your Social Security Number) is requested in order to track award recipients in the case that their name and/or address changes.

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.