

## 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:**

Camp Lejeune Historic Drinking Water (CLHDW) Registry

**2. DOD COMPONENT NAME:**

Department of the Navy/United States Marine Corps

**3. PIA APPROVAL DATE:**

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

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

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input 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 Camp Lejeune Historic Drinking Water Registry was developed in response to the mandate made by the National Defense Authorization Act for Fiscal Year 2008. The registry provides a means for Department of the Navy to provide information to those who may be affected by the formerly impacted drinking water at Camp Lejeune, as well as provide a method for the mandated health survey to be mailed. SEC. 315 NOTIFICATION OF CERTAIN RESIDENTS AND CIVILIAN EMPLOYEES AT CAMP LEJEUNE, NORTH CAROLINA, OF EXPOSURE TO DRINKING WATER CONTAMINATION.

(a) Notification of Individuals Served by Tarawa Terrace Water Distribution System, Including Knox Trailer Park.--Not later than 1 year after the date of the enactment of this Act, the Secretary of the Navy shall make reasonable efforts to identify and notify directly individuals who were served by the Tarawa Terrace Water Distribution System, including Knox Trailer Park, at Camp Lejeune, North Carolina, during the years 1958 through 1987 that they may have been exposed to drinking water contaminated with tetrachloroethylene (PCE).

(b) Notification of Individuals Served by Hadnot Point Water Distribution System.--Not later than 1 year after the Agency for Toxic Substances and Disease Registry (ATSDR) completes its water modeling study of the Hadnot Point water distribution system, the Secretary of the Navy shall make reasonable efforts to identify and notify directly individuals who were served by the system during the period identified in the study of the drinking water contamination to which they may have been exposed.

(c) Notification of Former Civilian Employees at Camp Lejeune.--Not later than 1 year after the date of the enactment of this Act, the Secretary of the Navy shall make reasonable efforts to identify and notify directly civilian employees who worked at Camp Lejeune during the period identified in the ATSDR drinking water study of the drinking water contamination to which they may have been exposed.

(d) Circulation of Health Survey.--

(1) Findings.--Congress makes the following findings:

(A) Notification and survey efforts related to the drinking water contamination described in this section are necessary due to the potential negative health impacts of these contaminants.

(B) The Secretary of the Navy will not be able to identify or contact all former residents and former employees due to the condition, no-existence, or accessibility of records.

(C) It is the intent of Congress that the Secretary of the Navy contact as many former residents and former employees as quickly as possible.

(2) ATSDR health survey--

(A) Development.--

(i) In general.--Not later than 120 days after the date of the enactment of this Act, the ATSDR, in consultation with a well-qualified contractor selected by the ATSDR, shall develop a health survey that would voluntarily request of individuals described in subsections (a),(b), and (c) personal health information that may lead to scientifically useful health information associated with exposure to trichloroethylene (TCE), PCE, vinyl chloride, and the other contaminants identified in the ATSDR studies that may provide a basis for further reliable scientific studies of potentially adverse health impacts of exposure to contaminated water at Camp Lejeune.

(ii) Funding.--The Secretary of the Navy is authorized to provide from available funds the necessary funding for the ATSDR

to develop the health survey.

(B) Inclusion with notification.--The survey developed under subparagraph (A) shall be distributed by the Secretary of the Navy concurrently with the direct notification required under subsection (a), (b), and (c).

(e) Use of Media to Supplement Notification.--The Secretary of the Navy may use media notification as a supplement to direct notification of individuals described under subsections (a), (b), and (c). Media notification may reach those individuals not identifiable via remaining records. Once individuals respond to media notifications, the Secretary will add them to the contact list to be included in future information updates.

The PII on the system includes: Name, home address, home phone number, and personal email.

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)

Administrative - PII is collected in order to have a means to respond to registrants with information/data as well as provide a way for the mandated health survey to be mailed.

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.

In order to be included in the registry the individual must provide at a minimum name and mailing address. The individual may object to the collection of a phone number and/or email address. When using the Marine Corps website to register, the individual must enter a telephone number, however, if the user enters zero it is accepted. When registering through the call center, the individual does not have to provide a telephone number. At anytime, individuals can request that their information be removed from the system.

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.

The Marine Corps is mandated by Congress to use the information collected to provide information and updates with regards to the Camp Lejeune Historic Drinking Water. Consent is originally given when the individual provides the information to be included in the registry.

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

In accordance with the Privacy Act of 1974 (Public Law 93-579), this notice informs you of the purpose of this data collection and how the collected data will be used. Please read it carefully.

AUTHORITY: 10 U.S.C. 5041. Headquarters, U.S. Marine Corps: Function: composition: PL 110-181, Sec 315, Notification of Certain Residents and Civilian Employees at Camp Lejeune, North Carolina, of Exposure to Drinking Water Contamination; and SORN M05100-6. SORN M05100-6 can be viewed at the following: <http://dpcid.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570632/m05100-6/>

PRINCIPLE PURPOSE: Information collected in this database will be used to provide notification to persons potentially exposed to drinking water containing tetrachloroethylene (PCE) or trichloroethylene (TCE) on MCB Camp Lejeune, NC, 1987 and before.

ROUTINE USES: information may be disclosed to:

To the officials and employees of the United States Marine Corps to facilitate the registration of individuals and the communication of the information regarding Camp Lejeune Historic Drinking Water to these registrants.

Also, pursuant to 5 U.S.C. 522a(b)(8) to federal and state public health and environmental agencies in the performance of their official duties related to the protection and study of human health and the environment as affected by potential exposure to toxic contamination.

Furthermore, to the Department of Veterans Affairs (DVA) for the purpose of providing medical care to former service members and retirees, to determine the eligibility for or entitlement to benefits, to coordinate cost sharing activities, and to facilitate collaborative research activities between the DoD and DVA.

To officials and employees of the Agency for Toxic Substances and Diseases Registry (ATSDR) to facilitate ATSDR research activities.

A complete list and explanation of the applicable routine uses is published in the authorizing SORN available at: <http://dpcid.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570632/m05100-6/>

**DISCLOSURE:** Provide information for this database in voluntary. However, failure to provide the requested information may result in delayed notification regarding developments concerning the Camp Lejeune Notification Registry - Privacy Notice drinking water issue that may be of interest to you or you family.

**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. Department of the Navy

Other DoD Components

Specify.

Other Federal Agencies

Specify. Agency for Toxic and Disease Registry  
Department of Veterans Affairs

State and Local Agencies

Specify. Environmental/Health agencies

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. AECOM- Section 9.1 and subsections -All tasks will be conducted in full compliance with DoD security regulations. Contract personnel will be required to access information and data accessed through portals via user accounts and the CAC that will be provided by the government. Contractor personnel providing support under this contract will require background checks in order to obtain user account at the IT level 3. Specific FAR privacy clauses are not included.

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

**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)

**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 M05100-6

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

NI-NU-89-4/5090/3, DAA-0127-2014-0022-0002

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

(3) Retention Instructions.

**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.

**SORN authorities:**

10 U.S.C. 5041, Headquarters, U.S. Marine Corps

PL 110-181, Sec. 315 Notification of Certain Residents and Civilian Employees at Camp Lejeune, North Carolina, of Exposure to Drinking Water Contamination

**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.

**OMB Control Number: 0703-0057**

**Expires on 12/31/19**

## SECTION 2: PII RISK REVIEW

a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Biometrics                      | <input type="checkbox"/> Birth Date                                       | <input type="checkbox"/> Child Information                                  |
| <input type="checkbox"/> Citizenship                     | <input type="checkbox"/> Disability Information                           | <input type="checkbox"/> DoD ID Number                                      |
| <input type="checkbox"/> Driver's License                | <input type="checkbox"/> Education Information                            | <input type="checkbox"/> Emergency Contact                                  |
| <input type="checkbox"/> Employment Information          | <input type="checkbox"/> Financial Information                            | <input type="checkbox"/> Gender/Gender Identification                       |
| <input checked="" type="checkbox"/> Home/Cell Phone      | <input type="checkbox"/> Law Enforcement Information                      | <input type="checkbox"/> Legal Status                                       |
| <input checked="" type="checkbox"/> Mailing/Home Address | <input type="checkbox"/> Marital Status                                   | <input type="checkbox"/> Medical Information                                |
| <input type="checkbox"/> Military Records                | <input type="checkbox"/> Mother's Middle/Maiden Name                      | <input checked="" type="checkbox"/> Name(s)                                 |
| <input type="checkbox"/> Official Duty Address           | <input type="checkbox"/> Official Duty Telephone Phone                    | <input type="checkbox"/> Other ID Number                                    |
| <input type="checkbox"/> Passport Information            | <input checked="" type="checkbox"/> Personal E-mail Address               | <input type="checkbox"/> Photo  |
| <input type="checkbox"/> Place of Birth                  | <input type="checkbox"/> Position/Title                                   | <input type="checkbox"/> Protected Health Information (PHI) <sup>1</sup>    |
| <input type="checkbox"/> Race/Ethnicity                  | <input type="checkbox"/> Rank/Grade                                       | <input type="checkbox"/> Religious Preference                               |
| <input type="checkbox"/> Records                         | <input type="checkbox"/> Security Information                             | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input type="checkbox"/> Work E-mail Address             | <input type="checkbox"/> If Other, enter the information in the box below |   |

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes     No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?

If "No," explain.

- Yes     No

b. What is the PII confidentiality impact level<sup>2</sup>?

- Low     Moderate     High

<sup>1</sup>The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.

<sup>2</sup>Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

c. How will the PII be secured?

(1) Physical Controls. (Check all that apply)

- |                                     |                   |                                     |  |
|-------------------------------------|-------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Cipher Locks      | <input type="checkbox"/>            | Closed Circuit TV (CCTV)                         |
| <input type="checkbox"/>            | Combination Locks | <input checked="" type="checkbox"/> | Identification Badges                            |
| <input type="checkbox"/>            | Key Cards         | <input type="checkbox"/>            | Safes  |
| <input type="checkbox"/>            | Security Guards   | <input type="checkbox"/>            | If Other, enter the information in the box below |
- 

(2) Administrative Controls. (Check all that apply)

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | Backups Secured Off-site                                  |
| <input type="checkbox"/>            | Encryption of Backups                                     |
| <input checked="" type="checkbox"/> | Methods to Ensure Only Authorized Personnel Access to PII |
| <input type="checkbox"/>            | Periodic Security Audits                                  |
| <input checked="" type="checkbox"/> | Regular Monitoring of Users' Security Practices           |
| <input type="checkbox"/>            | If Other, enter the information in the box below          |
- 

(3) Technical Controls. (Check all that apply)

- |                                     |                               |                                     |  |                                     |   |
|-------------------------------------|-------------------------------|-------------------------------------|--|-------------------------------------|---|
| <input type="checkbox"/>            | Biometrics                    | <input checked="" type="checkbox"/> | Common Access Card (CAC)                         | <input checked="" type="checkbox"/> | DoD Public Key Infrastructure Certificates  |
| <input checked="" type="checkbox"/> | Encryption of Data at Rest    | <input checked="" type="checkbox"/> | Encryption of Data in Transit                    | <input checked="" type="checkbox"/> | External Certificate Authority Certificates |
| <input type="checkbox"/>            | Firewall                      | <input type="checkbox"/>            | Intrusion Detection System (IDS)                 | <input type="checkbox"/>            | Least Privilege Access                      |
| <input type="checkbox"/>            | Role-Based Access Controls    | <input type="checkbox"/>            | Used Only for Privileged (Elevated Roles)        | <input checked="" type="checkbox"/> | User Identification and Password            |
| <input type="checkbox"/>            | Virtual Private Network (VPN) | <input type="checkbox"/>            | If Other, enter the information in the box below |                                     |   |
- 

d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?