

## 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:**

CWBI - CIVIL WORKS BUSINESS INTELLIGENCE

**2. DOD COMPONENT NAME:**

United States Army

**3. PIA APPROVAL DATE:**

US Army Corps of Engineers

### 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.**

CWBI directly supports the Corps of Engineers Civil Works in the area of performance measures for Water Resources by consolidating, integrating, and displaying geospatial data in the business areas of Navigation, Environmental Stewardship, Safety, Recreation, Hydropower, Flood Risk Management, and Regulatory and providing one-time, single point data entry for these systems. The system includes a data warehouse that merges financial data with the business function output and inventory data to produce performance measures of efficiency and effectiveness for the Operations and Maintenance community. Life-cycle phase is mixed operations and maintenance. CWBI databases are located on servers at the two processing centers within the USACE Enterprise Infrastructure Services USACE network. CWBI data tables are not directly linked to other USACE data tables for data sharing although data is uploaded to and/or extracted from other USACE data tables; CWBI does not interconnect with any system outside the USACE production environment. System backup is provided using servers located at the processing centers.

The Recreation module in the database includes the following primary personal information: individual's name, height, weight, eye color, date of birth, drivers license number, social security number, telephone number, and vehicle information: tag number, year, make, and color. The source of this information is directly from the individual record subject.

The Regulatory database includes the following primary personal information: individual's name, address, telephone number, fax number, and email address. The source of this information is directly from the individual record subject, a member of the public.

**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)

Recreation: Park rangers use the recreation module to collect data about the citations they issue to the public for misuse of Corps recreation areas.

Regulatory: The Mission of the Regulatory system is to assist in the processing of permit applications from individuals in order to allow reasonable development while protecting the Nation's waters and wetlands.

**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.

Recreation and Safety: Personal data is voluntarily given by the applicant and collected via manual forms.

Regulatory: Personal data is voluntarily given by the applicant and collected via electronic forms on the Internet Accessible segment of the USACE network or manual forms submitted to the district USACE Regulatory office. The ePermit form contains an applicable privacy statement.

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.

Recreation and Safety: Personal data is voluntarily given by the applicant and collected via manual forms.

Regulatory: Personal data is voluntarily given by the applicant and collected via electronic forms on the Internet Accessible segment of the USACE network or manual forms submitted to the district USACE Regulatory office. The ePermit form contains an applicable privacy statement.

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

Recreation: Individual is presented with a citation, ENG 4381, that has the Privacy Act Statement on the reverse side. This is a Title 36 citation authority under Flood Act of 1970, Public Law 91-611.

Regulatory: Individual voluntarily fills out the ENG 4345 standard form that has the Privacy Act Statement on the face of the form. Form is approved by OMB No. 0710-0003.

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.

Recreation data is shared with district USACE Regulatory office to follow up on citations. Regulatory data is shared with the district USACE Regulatory office for processing permits

Other DoD Components

Specify.

Other Federal Agencies

Specify.

Regulatory data will be shared among state regulatory agencies to enable processing of joint federal and state permit applications.

State and Local Agencies

Specify.

Recreation data will be shared with local law enforcement agencies.

Regulatory data will be shared among state regulatory agencies to enable processing of joint federal and state permit applications.

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.

Standard contract language should be contained in the contracts; however, as contracts are renewed the new standard statement per DoD memorandum "DoD Component Responsibility to Ensure Government Contract Compliance with the Privacy Act" (28 JAN 2015) shall replace current statements.

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

Both systems use the source of this information directly from the individual record subject.

**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 checked="" type="checkbox"/> Face-to-Face Contact                                     | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax   | <input checked="" type="checkbox"/> Telephone Interview                        |
| <input type="checkbox"/> Information Sharing - System to System                              | <input type="checkbox"/> Website/E-Form  |
| <input checked="" type="checkbox"/> Other (If Other, enter the information in the box below) |  |

Recreation: personal information is provided by the individual record subject via personal interview.

Regulatory: provided by the individual record subject by telephone interview or completion of electronic form.

**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

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.

**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.

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

(3) Retention Instructions.

Dock permit files are destroyed 6 years after expiration of permits/applications and then until no longer needed for conducting business. Dredging and dumping permit (standard permits field offices) records are destroyed seven years after revocation, expiration or removal of the object to which the permit pertains. Harbor lines approval records are permanent. Non-action construction permits are destroyed after expiration but not longer than 6 years. Standard permits are kept until no longer needed but not longer than 6 years. Rejected standard permit applications are destroyed three years after denial. Violation of Refuse Act files destroyed when no longer needed for business but not longer than 6 years. Official record copies used for litigation will be destroyed with those files.

- (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.

Regulatory authority: Rivers and Harbors Acts of 1890 (superseded) and 1899 (33 U.S.C. 401, et seq.); Section 10 (33 U.S.C. 403).

Recreation authority:

Debt Collection Improvement Act of 1996, 31 U.S.C. 7701(c)

Title 36, Chapter III, CFR 327- Rules and Regulations Governing Public Use Of Water Resources Development Projects administered by the Chief of Engineers Executive Order 9397

**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 No. 0710-0003

**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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input type="checkbox"/> Work E-mail Address             | <input checked="" type="checkbox"/> If Other, enter the information in the box below |  |

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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.

The United States District Court Violation Notice is the document that collects the SSN.

(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 Instructoin 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

Because the United States District Court Violation Notice is used and it requires the SSN.

**b. What is the PII confidentiality impact level<sup>2</sup>?**  Low  Moderate  High

(pending information regarding the CVB form)

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

Physical security consists of an access restricted area where the maintained server platforms are environmentally controlled and uninterruptible power supply protected. CWBI data is Unclassified-Sensitive Two (US2).

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

- Backups Secured Off-site
- Encryption of Backups
- Methods to Ensure Only Authorized Personnel Access to PII
- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- If Other, enter the information in the box below

All systems are housed in the USACE data center and maintained by CIO/G6 administrative staff. The CWBI system is subject to annual FISMA reviews.

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

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Biometrics                               | <input checked="" type="checkbox"/> Command 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 checked="" type="checkbox"/> Firewall                      | <input checked="" 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 checked="" 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?**

All systems are housed in the USACE data center and maintained by CIO/G6 administrative staff. The CWBI system is subject to annual FISMA reviews. The CWBI system is subject to annual FISMA reviews. Data is accessed via Common Access Card (CAC) and a userid validated and maintained through the USACE UPASS system. Any CWBI user must also be granted permission and then authenticated through the Oracle database. Passwords for both network access and database access must be changed every 60 days. All persons accessing CWBI participate in a periodic security training and awareness program. Regular applied patches to Information Assurance Vulnerability Alerts (IAVA's) and Security Technical Implementation Guides (STIG's) prevent any new opportunities to compromise CWBI data. Partners are provided information through regularly scheduled file transfers accomplished via ftp or email across the RSN or Non-classified but Sensitive Internet Protocol Router Network (NIPRNET). Files transferred across the Internet/NIPRNET are encrypted using a Virtual Private Network (VPN) or Advanced Encryption Standard (AES) 256-bit encryption. Physical security consists of an access restricted area where the maintained server platforms are environmentally controlled and uninterruptible power supply protected. CWBI data is Unclassified-Sensitive Two (US2).