

# 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:**

Holm Center Web Intensive New Gains System (WINGS) Application

**2. DOD COMPONENT NAME:**

United States Air Force

**3. PIA APPROVAL DATE:**

08/03/22

Department of the Air Force, Air Education and Training Command

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

**a. The PII is:** (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- From members of the general public  From Federal employees  
 from both members of the general public and Federal employees  Not Collected (if checked proceed to Section 4)

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

- New DoD Information System  New Electronic Collection  
 Existing DoD Information System  Existing Electronic Collection  
 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 Web Intensive New Gains System (WINGS) is the Holm Center Enterprise Resource Planning system that is used to track prospect, trainee, and staff information for the Air Force Junior Reserve Officer Training Corps (AFJROTC), Air Force Reserve Officer Training Corps (AFROTC), and Air Force Officer Training School (OTS). WINGS collects and maintains personal information required to process instructor and scholarship applications, cadet curriculum, financial transactions, and evaluate performance as required by Holm Center programs to support accession of cadets as officers in the USAF. PIA information collected is Citizenship, Employment Information, Home/Cell Number, Military records, Official Duty Address, Place of Birth, Race/Ethnicity, Records, Work E-mail Address, Birth Date, Disability Information, Education Information, Financial Information, Law Enforcement Information, Martial Status, Official Duty Telephone Phone, Personal Email Address, Position/Title, Rank/Grade, Security Information, Child Information, Emergency Contact, Gender/Gender Identification, Name (s), Other ID Number, Photo, and Social Security Number.

**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)

Identification, verification, authentication, data matching, and mission related

**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.

Applications for entry into Holm Center programs have consent statements and required PII collection. If no consent is given or required information is not provided, applicant may not enter Holm Center as an JROTC instructor or ROTC Cadet.

**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 general consent statement is that information will not be distributed and is for internal use only. When entering an obligated status there is an additional consent that information will be shared for pay, performance, and personnel tracking purposes.

**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

JROTC Instructor Application

Air Force JROTC

Privacy Act Statement:

AUTHORITY: 10 United States Code (U.S.C.) 2031 - Junior Reserve Officers' Training Corps, 10 U.S.C 2033 - Instructor Qualifications, 10 U.S.C. 9013 - Secretary of the Air Force implementing JROTC Air Force Instruction 36-2010 - Junior Reserve Officers' Training Corps Program, DoD Instruction 1205.13 - Junior Reserve Officers Training Corps (JROTC) Program, and Executive Order 9397 (SSN) - Numbering System for Federal Accounts Relating to Individual Persons.

PURPOSE: To evaluate individual's qualifications for employment as an AFJROTC instructor.

ROUTINE USES: As indicated in system notice F036 AETC B, Air Force Junior ROTC (AFJROTC) Applicant/Instructor System. Records from this system of records may be disclosed for any of the blanket routine uses published by the Air Force. This information may be disclosed to federal, state, or local agencies maintaining civil, criminal, or other relevant enforcement information, obtain information concerning hiring or retention of an employee, issuance of a security clearance, letting of a contract, or issuance of a license, grant or other benefit; to a federal agency in response to its request in connection with the hiring or retention of an employee, issuance of a security clearance, reporting of an investigation of an employee, letting of a contract, issuance of a license, grant, or other benefit by the requesting agency to the extent that the information is relevant and necessary to the requesting agency's decision on the matter; to NARA for records management functions; and to the Department of Justice for pending or potential litigation; to agencies, entities, and persons necessary to assist Components efforts with data breach remediation in connection to suspected or confirmed data compromise.

DISCLOSURE: Furnishing information is voluntary. Failure to provide information could result in non-selection of AFJROTC instructor duty.

Select "Yes" to acknowledge that:

I have read and agree to provide personal information required to be evaluated as for an AFJROTC Instructor position.

Yes

No

Air Force ROTC Pre-Screen

PRIVACY ACT STATEMENT

AUTHORITY: 10 USC 33 - Original Appointments of Regular Officers in Grades Above Warrant Officer Grades, 10 U.S.C. 103 - Senior Reserve Officers' Training Corps as implemented by Air Force Reserve Officers' Training Corps Instruction (AFROTCI) 36-2011, 10 U.S.C. 2107- Financial Assistance Program of Specially Selected Members, Executive Order 9897 - Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service, Executive Order, and 9397 (SSN) - Numbering System for Federal Accounts Relating to Individual Persons .

PURPOSE: To identify an AFROTC applicant's intention to either apply, accept, or decline an offer for ROTC membership or scholarship.

ROUTINE USES: As indicated in System of Record Notice (SORN) F036 AETC X, College Scholarship Program Files and for processing the application for membership in the ROTC program. Information will not be released outside of the DoD.

DISCLOSURE IS VOLUNTARY: Failure to provide requested information may hinder processing and may preclude activating a scholarship.

Select "Yes" to acknowledge that:

I am 13 years old or older AND

I have read and agree to provide personal information required to fully participate in the Air Force ROTC Program.

Yes

No

AF ROTC

PRIVACY ACT STATEMENT

AUTHORITY: AUTHORITY: 10 USC 33 - Original Appointments of Regular Officers in Grades Above Warrant Officer Grades, 10 U.S.C. 103 - Senior Reserve Officers' Training Corps as implemented by Air Force Reserve Officers' Training Corps Instruction (AFROTCI) 36-2011, 10 U.S.C. 2103, Eligibility for Membership, 10 U.S.C. 2104, Advanced Training; Eligibility for, Executive Order 9897 - Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service, Executive Order, and 9397 (SSN) - Numbering System for Federal Accounts Relating to Individual Persons .

PURPOSE: To process and manage selected students for acceptance into the USAF ROTC program.

ROUTINE USES: As indicated in System of Record Notice (SORN) F036 AETC X, College Scholarship Program Files and for processing the application for membership in the ROTC program. Records from this system of records may be disclosed for any of the blanket routine uses published by the Air Force. This information may be disclosed for federal, state, local or foreign law enforcement authorities for investigating or prosecuting a violation or potential violation of law; to federal, state, or local agencies to obtain information concerning hiring or retention of an employee, issuance of a security clearance, letting of a contract, or issuance of a license, grant or other benefit; to a federal agency in response to its request in connection with the hiring or retention of an employee, issuance of a security clearance, reporting of an investigation of an employee, letting of a contract, issuance of a license, grant, or other benefit by the requesting agency to the extent that the information is relevant and necessary to the requesting agency's decision on the matter; to a congressional office in response to their inquiry made at the request of the individual; to the Office of Management and Budget in connection with review of private relief legislation as set forth in OMB Circular A-19; to foreign law enforcement, security, investigatory, or administrative authorities to comply with requirements of international agreements and arrangements; to the state and local taxing authorities in accordance with Treasury Fiscal

Requirements Manual Bulletin 7607; to the Office of Personnel Management (OPM) concerning information on pay and leave, benefits, retirement deductions, and other information necessary for OPM to carry out its functions; to NARA for records management functions; and to the Department of Justice for pending or potential litigation; to agencies, entities, and persons necessary to assist Components efforts with data breach remediation in connection to suspected or confirmed data compromise.

DISCLOSURE: Furnishing the information is voluntary. Failure to provide requested information will hinder processing.

Select "Yes" to acknowledge that:

I am 13 years old or older AND

I have read and agree to provide personal information required to fully participate in the Air Force ROTC Program.

Yes

No

Air Force Officer Training School

**PRIVACY ACT STATEMENT**

**AUTHORITY:** 10 USC 907 – Schools and camps as implemented by Air Force Instruction 36-2013 Airman Commissioning Programs and Officer Training School, 10 U.S.C. 33 Original Appointments of Regular Officers in Grades Above Warrant Officer Grades, 10 U.S.C. Chapter 907 Schools and Camps, Executive Order 9897 Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service, Executive Order 9397, Numbering System for Federal Accounts Relating to Individual Persons.

**PURPOSE:** To monitor the progress of an individual toward completion of the program. Records may be grouped by class, squadron, flight, or performance factor in the accomplishment of evaluations of the program or the individual in relation of peers.

**ROUTINE USES:** As indicated in System of Record Notice (SORN) F036 AETC K, Officer Training School Flight Training Information System and for studies, analyses, and evaluations that use the records are intended to rank order graduates for each class and determine award winners. Post-graduation analysis of student records will be used to evaluate program effectiveness and to plan for future sessions. Records from this system of records may be disclosed for any of the blanket routine uses published by the Air Force. This information may be disclosed for federal, state, local or foreign law enforcement authorities for investigating or prosecuting a violation or potential violation of law; to federal, state, or local agencies to obtain information concerning hiring or retention of an employee, issuance of a security clearance, letting of a contract, or issuance of a license, grant or other benefit; to a federal agency in response to its request in connection with the hiring or retention of an employee, issuance of a security clearance, reporting of an investigation of an employee, letting of a contract, issuance of a license, grant, or other benefit by the requesting agency to the extent that the information is relevant and necessary to the requesting agency's decision on the matter; to a congressional office in response to their inquiry made at the request of the individual; to the Office of Management and Budget in connection with review of private relief legislation as set forth in OMB Circular A-19; to foreign law enforcement, security, investigatory, or administrative authorities to comply with requirements of international agreements and arrangements; to NARA for records management functions; and to the Department of Justice for pending or potential litigation; to agencies, entities, and persons necessary to assist Components efforts with data breach remediation in connection to suspected or confirmed data compromise; to appropriate entities when security or confidentiality of the information in the system of records has been compromised, there is a risk of harm to economic or property interests, identity theft or fraud, disclosure made is reasonably necessary to assist in responding to the suspected or confirmed compromise.

**DISCLOSURE IS VOLUNTARY:** Failure to provide requested information will hinder processing and may preclude continuing in Officer Training School.

Select "Yes" to acknowledge that:

I have read and agree to provide personal information required to fully participate in the Air Force OTS Program.

Yes

No

**h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?**  
(Check all that apply)

Within the DoD Component

Specify.

<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	DFAS, DEERS, DoDMERB, DTS, US Space Force
<input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	
<input type="checkbox"/> State and Local Agencies	Specify.	
<input type="checkbox"/> 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.	
<input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).	Specify.	University attended by Cadets receiving Scholarships

**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

<input checked="" type="checkbox"/> Individuals	<input type="checkbox"/> Databases
<input checked="" type="checkbox"/> Existing DoD Information Systems	<input type="checkbox"/> Commercial Systems
<input type="checkbox"/> Other Federal Information Systems	

**j. How will the information be collected?** (Check all that apply and list all Official Form Numbers if applicable)

<input checked="" type="checkbox"/> E-mail	<input type="checkbox"/> Official Form (Enter Form Number(s) in the box below)
<input checked="" type="checkbox"/> In-Person Contact	<input checked="" type="checkbox"/> Paper
<input type="checkbox"/> Fax	<input type="checkbox"/> Telephone Interview
<input type="checkbox"/> Information Sharing - System to System	<input checked="" type="checkbox"/> Website/E-Form
<input type="checkbox"/> 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 F036 AETC B, F036 AETC K, F036 AE

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpclld.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-AFU-92-13, N1-AFU-90-03

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

(3) Retention Instructions.

T 10 - 13 R 13.01; Cadet Evaluation or applications for AFROTC College Scholarship Program - Destroy after 1 year or when no longer needed, whichever is sooner.  
T 10 - 15 R 18.00; AFROTC Scholarship Program -- Destroy 1 year after termination of board cycle.  
T 10 - 15 R 21.00; Air Force Junior Reserve Officer Training Corps (AFROTC) -- Destroy 30 days after withdraw or termination of

eligibility.

T 65 - 24 R 08.00; AF Junior Instructor Pay - Destroy 6 years after individual has terminated employment, or 1 year after grievance or appeal is settled.

T 36 - 47 R 01.00; Applications for Officer Training School, Airmen Education and Commissioning Program, Flying Training...[cont.] -- Destroy after 1 year.

Among the dispositions cited in this field, the one with the longest retention time will be used on the system's records data.

**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.

- System of Record (SORN) F036 AETC B Air Force Junior ROTC (AFJROTC) Applicant/Instructor System
- System of Record (SORN) F036 AETC X College Scholarship Program (CSP)
- System of Record (SORN) F036 AETC K, Officer Training School Flight Training Information System
- 10 U.S.C. (United States Code) 9013, Secretary of the Air Force implementing JROTC Air Force Instruction 36-2010, Junior Reserve Officers' Training Corps Program
- 10 U.S.C. 2031, Junior Reserve Officers' Training Corps
- 10 U.S.C. 2033, Instructor Qualifications
- DoD Instruction 1205.13 Junior Reserve Officers Training Corps (JROTC) Program
- 10 U.S.C. 2103, Eligibility for Membership
- 10 U.S.C. 2104, Advanced Training; Eligibility for
- 10 U.S.C. 2107, Financial Assistance Program for Specially Selected Members
- 10 U.S.C. 103, Senior Reserve Officers' Training Corps, as implemented by Air Force Reserve Officers' Training Corps Instruction 36-2011, Air Force Reserve Officer Training Corps
- 10 U.S.C. 33 Original Appointments of Regular Officers in Grades Above Warrant Officer Grades
- 10 U.S.C. Chapter 907 Schools and Camps
- Executive Order 9897 Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service
- Executive Order 9397, Numbering System for Federal Accounts Relating to Individual Persons

**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.

PENDING: OMB 0701-0105 AFROTC Application, currently expired. The 60 Day Notice and the Federal Register citation was sent to the SAF/CNZA office 21 Sept 23 for review and publication.

PENDING: OMB 0701-XXXX AFJROTC Instructor Application, the 60 Day Notice and the Federal Register citation was published the week of 12 May 23. The OMB package and Supporting Documentation have been sent to the OMB office for review prior to posting to the PRA Tracker.

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

Signed by Holm Center/CC, Brig Gen Houston R. Cantwell, dated 27 Jul 23

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

(3) Security Clearance Investigation or Verification. The initiation, conduct, adjudication, verification, quality assurance, and billing fund control of background investigations and security clearances requires the use of the SSN. The SSN is the single identifier that links all of the aspects of these investigations together. This use case is also linked to other Federal agencies that continue to use the SSN as a primary identifier. WINGS uses the SSN for instructor and cadet background investigations, security clearance applications, and to acquire Common Access Cards (CAC).

(5) Confirmation of Employment Eligibility. Federal statute requires that all persons employed within the United States provide an SSN or comparable identifier to prove that they are eligible to work for or with the U.S. Government. Any system that deals with employment eligibility may contain the SSN. WINGS uses the SSN to verify employment eligibility for instructors.

(8) Computer Matching. Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information. WINGS interfaces with other DoD Systems that require the use of the SSN to provide computer matching between systems as verification of an individual's identity.

(11) Legacy System Interface. WINGS interfaces with many DoD systems of record that have not transitioned to the DoD ID Numbers as a unique identifier and require the SSN be provided.

(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".

The SSN only used when positive identification is needed. The SSN is not printed on documents unless no other choice exists. The SSN is stored in WINGS on one table as a non-key field. An Employee ID (system generated unique ID) is used across the WINGS system to uniquely identify the instructor or student. The SSN is also required by other DoD systems and will have to be retained until other systems no longer require the SSN.