

## 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:**

VolEd Customer Relationship Management Compliance Tool

**2. DOD COMPONENT NAME:**

Under Secretary of Defense for Personnel and Readiness

**3. PIA APPROVAL DATE:**

02/11/2025

Military Personnel Policy

### 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 Voluntary Education (VolEd) office utilizes a customer relationship management solution to manage communications with educational institutions who have signed a DoD Voluntary Education Partnership Memorandum of Understanding (MOU) with the Department in order to participate in the DoD Tuition Assistance program, which provides education benefits to active duty and reserve Service members. This system provides an organized central repository for communications between VolEd and these educational institutions, known as member institutions. The system also provides case management capabilities to ensure questions and issues submitted to the VolEd office are addressed effectively and efficiently and for the management and tracking of the Institutional Compliance Program (ICP) process.

The DoD VolEd MOU Partnership Institutional Compliance Program (ICP) is a full-scale, risk-based compliance program that assesses institutional compliance with these standards, in order to reduce risks associated with non-compliance. Each year, the ICP team considers the entire population of MOU signatories, leveraged over 24,000 pieces of data to narrow the population from over 2,700 to 250, and then conducts an in-depth assessment on those 250 institutions. The team then provides critical feedback to those institutions to enable them to implement Corrective Action Plans to improve their individual level of compliance with the tenets of their MOUs, utilizing the VolEd Customer Relationship Management Compliance Tool to assist with this assessment and communication.

To support these functions, publicly available data is collected from users of the application used to facilitate DoD Voluntary Education Partnership MOU Signatures, the Department of Defense Memorandum of Understanding (DoD MOU) Application, to grant these same users access to the VolEd Customer Relationship Management Compliance Tool, as required. College/University personnel who interact with the DoDMOU system provide names, professional email address, work phone numbers, and title/department, as points of contact for each member institution. This is publicly available information available from public websites. Once collected, it is used to identify and communicate with users of the VolEd Customer Relationship Management Compliance Tool system.

**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)

Verification and identification of users

**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.

Individuals are provided with a Privacy Act Statement outlining the specific uses of the information collected, at the initial point of collection for DoDMOU.

**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.

Once provided, individuals do not have the opportunity to consent to specific uses of their PII, however, information will only be used for the specific purpose for which it is collected as specified in the the Privacy Act Statement provided at the point of collection.

**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

Department of Defense Memorandum of Understanding (DoD MOU) Application

Authority: DoDI 1322.25, Voluntary Education Program; DoDD 1322.08E, Voluntary Education Programs for Military Personnel; and E.O.9397 (SSN), as amended.

Principal Purpose(s): To process memorandum of understanding applications and verify educational institution information provided is accurate and meets the DoDI 1322.25 eligibility requirements to participate in the military Tuition Assistance program.

Routine Use(s): To contractors responsible for performing or working on contracts for the DoD when necessary to accomplish an agency function related to this system of records. For a complete list of routine uses, visit the applicable system of records notice at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

Disclosure: Voluntary; however, failure to provide the requested information may result in a delay of processing and/or eligibility approval to participate in the military tuition assistance program.

**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)

<input checked="" type="checkbox"/> Within the DoD Component	Specify.	<input type="text" value="DHRA"/>
<input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	<input type="text"/>
<input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	<input type="text"/>
<input type="checkbox"/> State and Local Agencies	Specify.	<input type="text"/>
<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 type="text"/>
<input type="checkbox"/> Other (e.g., commercial providers, colleges).	Specify.	<input type="text"/>

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

<input 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	

DoD MOU

**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 type="checkbox"/> In-Person Contact	<input type="checkbox"/> Paper
<input type="checkbox"/> Fax	<input type="checkbox"/> Telephone Interview
<input checked="" type="checkbox"/> Information Sharing - System to System	<input 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

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.

**I. 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.

Disposition pending (until the National Archives and Records Administration approve the retention and disposition of these records, treat as permanent).

**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.

E.O. 13607, Establishing Principles of Excellence for Educational Institutions Serving Service Members, Veterans, Spouses, and Other Family Members; and DoD Instruction 1322.25, Voluntary Education Programs.

**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 submission to DoD OIM and publication in the Federal Register.