

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:

DOD Safe Helpline

2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

3. PIA APPROVAL DATE:

07/25/23

Sexual Assault Prevention and Response Office (SAPRO)

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 purpose of the DoD Safe Helpline (SHL) is to provide anonymous one-on-one support and information to victims of sexual assault under the jurisdiction of the military Services worldwide. The system also serves as a tool to track and respond to requests for SHL marketing and promotional material. The Rape, Abuse & Incest National Network (RAINN) operates the SHL under contract to the DoD. To ensure the integrity of SHL services, PII is only collected within the following SHL subcomponents:

Material Requests (DD Form 2985-2) - Available on safehelpline.org, the Material Request Form (DD Form 2985-2) is used to request SHL marketing and promotional materials. The information collected includes: first and last name, phone number, email, shipping address, installation/base, rank (if applicable), status/position (e.g., Sexual Assault Response Coordinator (SARC), victim advocate, third party organization, etc.), affiliation (e.g. Service, family member, veteran, etc.), and an open comment field for questions and suggestions. Users have the option to create an account with their email and a user-selected password to place recurring orders and track the status of their current order.

Military Feedback (DD Form 2985-1)- Available on safehelpline.org, the Military Feedback Form (DD Form 2985-1) enables individuals to leave comments, compliments, or complaints about SAPR services received. Information provided on this form is forwarded to DoD SAPRO and maintained in the Victim-Related Inquiries system of record. Information collected can include: first and last name, user type (e.g. victim/survivor, family friend, etc.), Service affiliation, status/position (e.g., Service member, military spouse, DoD civilian employee, etc.), installation/base where the interaction took place, date of incident, the name and/or office and title of the military personnel about which the feedback is being submitted, an open comment field which states, "If you have a complaint, or a compliment, about the service you received, please be as specific as possible," a selection to opt-in or out of SAPRO following up with the submitter on the complaint, and email address and phone number. The form may be submitted with as much or as little information as the user is willing to provide, including anonymously. This form is also used for PREA related reporting.

Responder Database - The Safe Helpline Responder Database is a publicly searchable referrals database that includes non-identifying work-related contact information for SARCs, medical, legal, chaplain, and military police resources, as well as information for civilian sexual assault service providers. Users are able to type in a base/installation name or zip code and the database results provide non-identifying work-related contact information (installation/base name and responder phone numbers) for each responder.

Responder Administrative Database - Information for military service providers are provided and maintained by Service SAPR and National Guard Bureau POCs. These POCs are granted accounts to the Responder Administrative Database to manage the non-identifying information available in the Responder Database. POC information includes only a military email address, first and last name. Responder information includes Responder type, Installation/base name and address, and responder phone number(s).

Follow-up Support Services (FSS) - Follow-up Support Services maintains information regarding referrals discussed during an individual's call to the SHL in order to help address ongoing issues or difficulties and ensure that quality care continues when there are changes in program management/staff. Name or pseudonym, phone number, rank, base, state, and age may be required in order to offer support services to individuals who have not reported their assaults to a military authority. Collecting these data fields ensures that any individual opting to receive follow-up support services from a SHL staff member can get support in a way that is most convenient for them.

Victim Reporting Preference Statement (DD Form 2910) - If a victim chooses to report directly through DoD Safe Helpline, hotline staff will advise the victim of the reporting options available to them, explain the benefits and limitations of each, and document the reporting option the victim selects using DD Form 2910. The form is then transmitted to the victim for signature, signed by the Safe Helpline staff member that supported the form completion, and forward to the SARC for further processing and continued victim support and case management. Information collected can include: full name, DoD Identification number and type of report (restricted or unrestricted) selected. Although a field exists for SSN, this will NOT be solicited from the individual and therefore will not be used for forms completed by Safe Helpline.

Retaliation Reporting Statement for Unrestricted Sexual Assault Cases (DD Form 2910-2) - Information will be used to document reports of retaliation and elements of the response related to retaliation reports when the retaliation is associated with an Unrestricted Report of sexual assault. Safe Helpline personnel use information to ensure that victims are aware of available services. At the DoD level, only de-identified data is used to respond to mandated congressional reporting requirements. Although a field exists for SSN, this will NOT be solicited from the individual and therefore will not be used for forms completed by Safe Helpline.

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; Mission-related use; administrative use

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.

Voluntary, however, failure to provide information may limit SHL's ability to provide requested services.

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.

Individuals requesting SHL services cannot give or withhold their consent to specific uses of their PII. The information collected is used only for those limited purposes which are required in order for services to be provided.

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

DD 2895-1

Authority: 10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR Program); DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures.

Principal Purpose(s): To track victim-related inquiries received by the Sexual Assault Prevention and Response Office (SAPRO) via e-mail, SAPR.mil, the DoD Safe Helpline, phone, or postal service. Once received, inquiries are referred to the appropriate agency POC and/or to the DoD IG in order to address the issue(s) raised and facilitate a resolution. To allow individuals to provide feedback on the services of a SARC, victim advocate, or other military staff or personnel on their installation/base. This form does not constitute a report of sexual assault.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. To contractors, grantees, experts, consultants, students, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for the federal government when necessary to accomplish an agency function related to this system of records. Additional, routine uses may be found in the applicable system of records notice, DHRA 18 DoD, DoD Sexual Assault Prevention and Response Office Victim Assistance Data Systems at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

Disclosure: Voluntary; however, failure to provide information may result in the inability to provide requested services.

DD Form 2985-2

Authority: 10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR Program); and DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures.

Principal Purpose(s): To provide for requests for Safe Helpline marketing and promotional materials.

Routine Use(s): Disclosure of records are generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. To contractors, grantees, experts, consultants, students, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for the federal government when necessary to accomplish an agency function related to this system of records. Additional, routine uses may be found in the applicable system of records notice, DHRA 18 DoD, DoD Sexual Assault Prevention and Response Office Victim Assistance Data Systems at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Component-Notices/OSDJS-Article-List/>

Disclosure: Voluntary; however, failure to provide information may result in the inability to provide requested services.

DD Form 2910

Authority: 10 U.S.C. 932, Art. 132 Retaliation, 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness: 10 U.S.C. 7013, Secretary of Army, 10 U.S.C. 8013, Secretary of the Navy, 10 U.S.C. 9013, Secretary of the Air Force, 32 U.S.C. 102, National Guard; DoD Directive 6495.01, (Sexual Assault Prevention and Response Program); DoD Instruction (DoDI) 6495.02, Volume 1 (Sexual Assault Prevention and Response: Program Procedures); DoDI 6495.02, Volume 3, (Sexual Assault Prevention and Response: Retaliation Response for Adult Sexual Assault Cases); Army Regulation 600-20 (Army Command Policy) Chapter 7; Office of the Chief of Naval Operations (OPNAV) Instruction 1752.1C, Sexual Assault Prevention and Response Program; Marine Corps Order 1752.5C, SAPR Program; Air Force Instruction 90-6001, SAPR Program; and E.O. 9397 (SSN), as amended.

Principal Purpose(s): Information will be used to document elements of the sexual assault response and/or reporting process and any associated retaliation reporting, and to comply with procedures set up to effectively manage the Sexual Assault Prevention and Response Program.

Routine Use(s): Applicable Routine Use(s) are: To ensure appropriate monthly coordination and collaboration to support victim care and case disposition related to an unrestricted report of sexual assault and any associated retaliation reporting. Additional routine uses are listed in the applicable system of records notice, DHRA 06, Defense Sexual Assault Incident Database (DSAID), at <https://dpcid.defense.gov/Privacy/SORNsinex/DOD-wide-SORN-Article-View/Article/570559/dhra-06-dod/>. This form will be retained for 50 years.

Disclosure: Voluntary; however, failure to provide information may result in the inability to provide requested services.

DD Form 2910-2

Authority: 10 U.S.C. 932, Art. 132 Retaliation, 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness: 10 U.S.C. 7013, Secretary of Army, 10 U.S.C. 8013, Secretary of the Navy, 10 U.S.C. 9013, Secretary of the Air Force, 32 U.S.C. 102, National Guard; DoD Directive 6495.01, (Sexual Assault Prevention and Response Program); DoD Instruction (DoDI) 6495.02, Volume 1 (Sexual Assault Prevention and Response: Program Procedures); DoDI 6495.02, Volume 3, (Sexual Assault Prevention and Response: Retaliation Response for Adult Sexual Assault Cases); Army Regulation 600-20 (Army Command Policy) Chapter 7; Office of the Chief of Naval Operations (OPNAV) Instruction 1752.1C, Sexual Assault Prevention and Response Program; Marine Corps Order 1752.5C, SAPR Program; Air Force Instruction 90-6001, SAPR Program; and E.O. 9397 (SSN), as amended.

Principal Purpose(s): Information will be used to documents reports of retaliation and elements of the response related to retaliation reports when the retaliation is associated with an Unrestricted Report of sexual assault. SARP Program personnel use information to ensure that victims are aware of available services. At the DoD level, only de-identified data is used to respond to mandated congressional reporting requirements.

Routine Use(s): Applicable Routine Use(s) are: To Permit the disclosure of records of closed cases of unrestricted reports to the Department of Veterans Affairs (DVA) for purpose of providing mental and medical care to former Service members, to determine the eligibility for or entitlement to benefits, and to facilitate collaborative research activities between the DoD and DVA. Additional routine uses are listed in the applicable system of records notice, DHRA 06, Defense Sexual Assault Incident Database (DSAID), at <https://dpcid.defense.gov/Privacy/SORNsinex/DOD-wide-SORN-Article-View/Article/570559/dhra-06-dod/>

Disclosure: Voluntary. However, if you decide not to provide certain information, it may impede the ability of the SARC to offer the full range of care and support established by the Sexual Assault Prevention and Response program. You will not be denied advocacy services or healthcare (medical and mental health) because you selected Restricted Reporting option. The Social Security Number (SSN) is one of several unique personal identifiers that may be provided. This form will be retained for 50 years."

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. | Office of General Counsel |
| ☒ Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | Service Headquarter level Sexual Assault Prevention and Response Office |
| ☐ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | |
| ☐ State and Local Agencies | Specify. | |
| ☒ 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. | RAINN (IL4)
DocuSign (IL4) |
| ☒ Other (e.g., commercial providers, colleges). | Specify. | Materials Request Platform (Nonprofit Business Solutions)
Materials Warehouse (EPI Marketing) |

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 | |

Individual; appointed Service SAPR and National Guard Bureau points of contact; Materials Request Platform

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) |
| ☐ In-Person Contact | ☒ Paper |
| ☐ Fax | ☒ Telephone Interview |
| ☐ Information Sharing - System to System | ☒ Website/E-Form |
| ☐ Other (If Other, enter the information in the box below) | |

DD Forms 2985-1 and 2985-2; DD Form 2910 and 2910-2

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 DHRA 06 DSAID

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

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

(3) Retention Instructions.

Military Feedback: Temporary, Cut off resolved cases files at end of calendar year. Destroy 25 year(s) after cut off. (DAA-0330-2016-0005)

Material Requests: Temporary, Cut off completed/canceled request for material at the end of the fiscal year. Destroy 3 months after cut off. (OSD/RDS 101-22)

Responder Database: Temporary, Cut off obsolete/revised records at the end of the fiscal year. Destroy 1 year after cutoff. (GRS 16, Item 14c, N1-GRS-98-2 item 23)

Follow-up Support System: Temporary, Cut off at the end of fiscal year of close-out of communication. Destroy 25 year(s) after close-out of communication (DAA-0330-2016-0004)

DD Form 2910 and DD Form 2910-2 are ingested into the DSAID SOR, Cutoff cases at the end of the fiscal year and destroy 50 years thereafter.

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.

10 U.S.C. 1561 note, Improved Sexual Assault Prevention and Response in the Armed Forces; DoD Directive 6495.01, Sexual Assault Prevention and Response (SAPR) Program; DoD Instruction 6495.02, Sexual Assault Prevention and Response (SAPR) Program Procedures, NDAA FY22 Sec549H

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 Number 0704-0565, "DoD Sexual Assault Prevention and Response Office Victim-Related Inquiries," Expiration: 12/31/2025

OMB Number 0704-0482, "Victim Reporting Preference Statement," Expiration: 03/31/2025

OMB Number 0704-0482 "Retaliation Reporting Statement for Unrestricted Sexual Assault Cases" Expires: 03/31/2025