

# 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:**

Learning Management System, (WHS iCompass)

**2. DOD COMPONENT NAME:**

Washington Headquarters Service

**3. PIA APPROVAL DATE:**

08/15/24

WHS/HRD

## 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.**

Information is used to manage and administer a Learning Management System (LMS) for training and development programs; to identify individual training needs; for the purpose of reporting, tracking, assessing and monitoring training events, and DoD Financial Management certifications. PII collected includes name, DoD identification (DoD ID) number, position title, work phone number, pay plan, series, grade, organization, supervisor, hire date, course name and course date and time of completed trainings, educational level of civilian employees, and Financial Management (FM) certification level.

**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)

System is the WHS Learning Management System which manages and administers training and development programs and manages the DoD Financial Management Certification Program Administrative use to train and develop personnel IAW 5 U.S.C Chapter 41, 5 CFR part 410, 10 U.S.C 113, 10 U.S.C. 136, DoDI 1322.26, DoDI 1300.26 in terms of the Enterprise Human Resource Initiative.

**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.

iCompass users are not given the option to opt out of providing their PII. PII is required to identify trainees, course completion date, certifications, and a host of trainings for the Department provided by DoD. PII is used to properly identify each member and their course completion.

**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.

Information is strictly used from iCompass only and shall not be released outside of DoD.

**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

**AUTHORITY:** 5 U.S.C. Chapter 41, the Government Employee Training Act; 5 CFR part 410, Office of Personnel Management-Training; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; DoD Instruction 1322.26, Distributed Learning; DoD Instruction 1300.26, Operation of the DoD Financial Management Certification Program.

PURPOSE: Information will be used to manage and administer training and development programs; to identify individual training needs; for reporting, tracking, monitoring, and assessment purposes and DoD Financial Management certifications.

ROUTINE USE(S): Information within this system may be subject to a number of proper and necessary routine uses identified in the system of records notice(s) specified in the purpose statement above. For additional information see the System of Records Notice(s) DoD 0005, Defense Training Records <https://www.federalregister.gov/documents/2020/12/28/2020-26548/privacy-act-of-1974-system-of-records>.

DISCLOSURE: Voluntary. However, if sponsored training is not completed through iCompass The individual might not receive credit for completion. If the individual is a Financial Manager and does not provide the requested information they might not be granted certification or CEUs. Operation of the DoD Financial Management Certification 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. | DCPAS, OUSD, Comptroller, internal to WHS and OSD Components serviced by iCompass |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. |   |
| <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. | FedRamp AWS Web Services through DISA   |

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

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

DCPDS, MILPERS, Active Directory, and individual

**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 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) |  |

The data is not interfacing directly with any other systems. The data will be downloaded in a flat text file from the systems of record formatted appropriately and then imported into the LMS.

**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.

**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. GRS 2.6, item 010 (DAA-GRS-2016-0014-0001)

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

(3) Retention Instructions.

In accordance with the OSD Records Disposition Schedule file number file number 202-48.2 Non-Mission Employee Training Program Records. Temporary. Cut off annually or when superseded or obsolete (as appropriate). Destroy 3 years after cutoff.

**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.

5 U.S.C. Chapter 41, the Government Employee Training Act; 5 CFR part 410, Office of Personnel Management-Training; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; DoD Instruction 1322.26, Distributed Learning; DoD Instruction 1300.26, Operation of the DoD Financial Management Certification Program.

**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.

WHS/ESD/Directives Division Collections Section provided the following statement: The system does not have PRA requirements, since the data is being pulled from another source (and the only other information is a record that training was completed), this will not need to be cleared.