



# EXCHANGE

## PRIVACY IMPACT ASSESSMENT (PIA)

TUITION ASSISTANCE CASE FILES
EXCHANGE HUMAN RESOURCE

Questions relative to this document should be directed to the Exchange HQ Information Technology Governance Risk Management or to the Exchange Office of General Counsel, Compliance Division by mail to 3911 S. Walton Walker Blvd., Dallas, TX 75236.

**OBJECTIVE:** The objective of a PIA is to determine the scope, justification, and Privacy Act applicability for systems collecting, storing, or processing sensitive, personal data that may be concerned to be private. A PIA should be completed prior to development/procuring any new IT system which collects/maintains such information or updated when a significant change is made to the system. The completed PIA should be directed to the system owner, to the IT-Government (IT-G) representative, and to the Office of General Counsel, Compliance Division (OGC-C).

### SECTION 1: IS A PIA REQUIRED?

**A. Will this Exchange information system or electronic collection of information collect, maintain, use, and/or disseminate Personal Identifiable Information (PII) about members of the public, federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? (Mark all that apply).**

- |   |   |
|---|---|
| <input type="checkbox"/> Members of the General Public.                     | <input type="checkbox"/> Foreign Nationals                  |
| <input checked="" type="checkbox"/> Federal Personnel / Exchange Associates | <input type="checkbox"/> Federal Contractors and/or Vendors |

**B. If no items are marked in question A, you may stop here. Have this PIA signed and return it to the system owner. A copy should also be directed to IT-G and to OGC-C.**

**C. If any item in A is marked, proceed to Section 2.**

**SECTION 2: PIA SUMMARY INFORMATION**

**A. Why is this PIA being created or updated? Choose one:**

- New Information System
- Existing Information System
- Significantly Modified Information System
- New Electronic Collection
- Existing Electronic Collection

If unsure, consult IT-G or OGC-C.

**B. Does this information system or electronic collection require a Privacy Act System of Records Notice (SORN)? [if unknown, please contact OGC-C]**

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 should be consistent.

- Yes
- No, a SORN is not required for this system.

If "Yes," enter Privacy Act SORN Identifier

AAFES 0408.14

Date of submission for approval to Defense Privacy Office

Consult the OGC-C for this date.

OCTOBER 2014

**C. Does this information system or electronic collection have an Office of Management & Budget (OMB) Control Number? [If unknown, contact OGC-C].**

- Yes

Enter OMB Control Number

Enter Expiration Date

- No

**D. Authority to collect information. Please list the Federal law, Executive Order of the President (EO), or regulation which authorizes the collection and maintenance of a system of records. [If unknown, contact OGC-C]**

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) Cite the authority for this information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.) i.e. Title 10 U.S.C. § 3013, "Secretary of the Army".

(a) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) The Exchange may use Exchange Operating Procedures, Exchange Standards of Operations, or CEO Guidance as the primary authority. The requirement, directive, or instruction implementing the statute within the Exchange should be identified.

10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 8013, Secretary of the Air Force; Army Regulation 215-1, The Administration of Morale, Welfare, and Recreation Activities and Non-appropriated Fund Instrumentalities; Army Regulation 215-8/AFI 34-211(I), Army & Air Force Exchange Service Operations; and E.O. 9397 (SSN) as amended.

**E. Summary of information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.**

(1) Describe the purpose of this information system or electronic collection.

To maintain information on participants in the tuition assistance program.

(2) Briefly describe the types of personal information about individuals collected in this system.

Associate's tuition reimbursement application; associate's academic transcripts, curricula, grade reports; request for disbursement, Exchange approval/disapproval documents, partial social security number.

(3) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Risks include unauthorized access to the system and data leakage. Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need to know" who are responsible for servicing the record in performance of their official duties. Persons are properly screened and cleared for access. Access to computerized data is role-based and further restricted by passwords, which are changed periodically. In addition, integrity of automated data is ensured by internal audit procedures, data base access accounting reports and controls to preclude unauthorized disclosure.

**F. With whom will the PII maintained in this system be shared? (i.e., other DoD Components, Federal Agencies)?** Indicate all that apply. Questions should be coordinated with OGC-C.

**Within the Exchange.**

Specify.

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

**Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

**Other** (e.g., commercial providers, colleges).

Specify.

**G. Do individuals have the opportunity to object to the collection of their PII (opt-out)?**

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Information collection is solely based on the associates desire to obtain tuition reimbursement funds from the Exchange. They can elect not to provide personal information and withdraw their consent.

(2) If "No," state the reason why individuals cannot object.

n/a

**H. 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.

n/a

(2) If "No," state the reason why individuals cannot give or withhold their consent.

Information collected is needed for identification purposes and in administering reimbursement funds. PII is needed for income and tax purposes.

**I. What information is provided to an individual when asked to provide PII data? Indicate all that apply.**

Privacy Act Statement

Privacy Advisory

Exchange Privacy Policy

None

Other

Describe each

PRIVACY ACT OF 1974: Solicitation of your Social Security Number and/or other personal information is authorized by Title 10, U.S. Code 3013 and 8013. Failure to provide requested

applicable  
format  
listed  
above.

information could result in no tuition reimbursement assistance being granted.

**NOTE:**

**Sections 1 and 2 above will be posted to the Exchange's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.**

**The Exchange may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.**