



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Educational and Developmental Intervention Services (EDIS) Website (Extranet)  
(<https://www.edis.army.mil>)

US Army Medical Command - Defense Health Program Funded Application

### SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel\* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

**SECTION 2: PIA SUMMARY INFORMATION**

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

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

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR      Enter DITPR System Identification Number
- Yes, SIPRNET      Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes
  - No
- If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes
  - No
- If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.  
Consult the Component Privacy Office for additional information or  
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office   
Consult the Component Privacy Office for this date.

**e. Does this DoD information system or electronic collection have an 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**

**Enter OMB Control Number**

**Enter Expiration Date**

**No**

**f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.**

(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 DoD information system or electronic collection to collect, use, maintain and/or disseminate PII. (If multiple authorities are cited, provide all that apply.)

(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) 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 should be identified.

Not applicable.

**g. Summary of DoD 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 DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

Educational and Developmental Intervention Services (EDIS) provides services to support families of children developmental delays, disabilities, or special learning needs. It delivers Early Intervention Services (EIS) to eligible infants and toddlers and their families in domestic and overseas areas. The EDIS website provides up-to-date information and resources for EDIS providers, administrators, military commands, and families. The EDIS website also offers the following training opportunities:

- Personnel Development. DoD personnel can complete the Early Intervention Services (EIS) training modules and opt-in to take the associated competency examination. A system-generated certificate of completion is issued to individuals who pass the competency examination.

- Supplemental Training. DoD personnel and members of the public can complete the supplemental training which consists of reviewing the Keeping In Touch (KIT) newsletters. Individuals can opt-in to take the associated competency examination. A system-generated continuing education unit (CEU) certificate of completion is issued to individuals who pass the CEU examination.

The name and location of individuals who opt-in to take the examinations and the examination scores are stored in a database. The PII in this database is only available to the EDIS Program Manager and the Website Administrators.

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

The privacy risks associated with the PII collected are unauthorized access and unauthorized disclosure. There are security safeguards in place to mitigate these risks. The specific security safeguards are addressed in Section 3d and 3f below.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.**

**Within the DoD Component.**

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.

**i. Do individuals have the opportunity to object to the collection of their PII?**

- Yes**  **No**

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

Individuals review the EDIS Website Privacy and Security Policy which outlines the type of PII collected and how the PII will be used. The submission of their PII is voluntary. If individuals object to the collection of their PII, they will not be provided the opportunity to take the competency examinations associated with the training and receive a training certificate.

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

**j. 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.

Individuals review the EDIS Website Privacy and Security Policy which outlines the type of PII collected and how the PII will be used. The submission of their PII is voluntary. If individuals object to the specific uses of their PII, they will not be provided the opportunity to take the competency examinations associated with the training and receive a training certificate.

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

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

- |  |  |
|--|--|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other                 | <input type="checkbox"/> None                        |

Describe each applicable format.

The following Privacy Advisory is posted on the Personnel Development and KIT Newsletters web pages and is linked to the EDIS Privacy and Security Policy: Please refer to the Privacy and Security Notice for a description of the personal information that will be collected and how it will be used.

- Privacy Advisory for the KIT CEU exams - Individual's names are maintained in a database and are used only for tracking purposes and issuing certificates of completion.

- Privacy Advisory for Personnel Development exams - Individual's names are maintained in a database and are used to issue certificates of completion, and to log EDIS staff completion of the required training modules.

**NOTE:**

**Sections 1 and 2 above are to be posted to the Component'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.**

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