

## 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:**

AFRICOM COVID-19 Immunization Tracker

**2. DOD COMPONENT NAME:**

United States Africa Command

**3. PIA APPROVAL DATE:**

12/29/20

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |   |   |
|---|---|
| <input type="checkbox"/> From members of the general public   | <input checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)              |

**b. The PII is in a:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" type="checkbox"/> Existing DoD Information System    | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 COVID-19 Immunization Tracker will be used to gauge interest of individuals currently assigned to USAFRICOM, triage people who would like to be vaccinated based on their answers to questions within the tool, and track when individuals receive their each dose of the vaccine.

The COVID-19 tracker will be found only on the USAFRICOM Portal, essentially a Microsoft SharePoint site that can be accessed only by personnel who are have been provided access permission by the AFRICOM C4S. Users will be able to access the tracker only after they have logged in to the USAFRICOM portal, Users may login by visiting the USAFRICOM webpage at <https://www.africom.mil>, and clicking on the AFRICOM Portal link. Users will then be taken to the AFRICOM Portal, where they will be prompted to login using their CAC card and pre-established PIN number. Once individuals have logged in, they will be provided with a warning message, stating, inter alia, that they all actions on the Portal are subject to monitoring. Users will then be able to Select the link for the COVID-19 Tracker. Once they open the COVID-19 tracker, they are asked to provide the following:

- Name (which may be auto-populated from their login information),
- The Directorate for which they work
- DSN phone number,
- Off duty phone
- Work email
- Personal email

Once the user has provided any part of this information, they will be prompted with the question, "My intent is to get the COVID-19 vaccination as soon as it becomes available. They have the option to select "yes" or "no". If the individual selects "no" the questions that follow will be automatically disabled. If the individual answers "yes", they will taken to a questions that asks "Are you currently pregnant". If the individual answers "yes" the questions that follow will automatically disabled. If the individual answers "yes" The following questions will follow:

-Age Group - one of six scored age groups will be available to be selected. Once the age group has been selected, the individual will be asked whether he or she has a history of Solid Organ Transplant. After responding to the organ transplant question, there will be a series of 13 scored "yes" or "no" questions related to medical history. Once the individual saves the questionnaire, it will no longer be visible. The scored information will be used to provide a pre-established order for vaccination, based upon the DoD Population Schema Prioritization. Individuals will be notified of the availability of the vaccination based upon the aforementioned order. When they are notified, they will be asked to return to the tracker to answer the following follow-on questions:

- Date notified of availability
- Do you plan to receive the (first) offer, "yes" or "no"?
- Date first injection was received
- Date notified of availability of second injection
- Do you plan to receive the second injection. "yes" or "no"?
- Date second injection was received.

Users on the back-end will consist only of 2-4 staff from the USAFRICOM Surgeon's Office. They will use the data collected from the tool to triage recipients of the vaccine, based on the scoring of the responses entered into the tool the individual user. That triage list will be used to contact individuals as the vaccine becomes available. The contact information provided will be used to inform the individual of the availability of the vaccine, and to confirm that they are still interested in receiving it. It will also be used to set appointments with the clinic. Once the individual receives the first dose of the vaccine, they will be asked to return to the tool to enter the date they received it and to answer if they intend to receive the second injection. If they do, the contact information previously provided will be used to contact them in order to set a second appointment. Once the individual receives the second dose, they will be asked to return to the tool one last time to enter the date that they received it.

**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)

PII is collected for purpose of identification so that individuals who are interested can be contacted in order to schedule their vaccinations, gauge interest in a second vaccination, and provide the second vaccination, if the individual is interested.

**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 may refuse to enter any information in the tracker. They may also provide as much or as little information as they choose. The effect of providing no information would be that the individual will not receive notification of the availability of the vaccine. Providing limited contact information may limit the ways in which the individual may be contacted when a vaccine is available to them. Providing limited health data may affect the timeliness of the individual receiving the vaccine. Failure to provide vaccination information could affect the timing of the second dose, if the individual is interested in receiving it.

**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.

Contact information will be used to inform the individual of the availability of the vaccine. The health information, if provided, will be used to triage the individual in accordance with DoD Population Schema Prioritization

**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

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component?** (Check all that apply)

- Within the DoD Component Specify.
- Other DoD Components Specify.
- Other Federal Agencies 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.

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

**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

All information in the tracker will be collected directly from the individuals themselves.

**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)  
 Face-to-Face Contact  Paper  
 Fax  Telephone Interview  
 Information Sharing - System to System  Website/E-Form  
 Other (If Other, enter the information in the box below)

As discussed above, the tracker will consist of a dedicated SharePoint site.

**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.dod.mil/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.

Information will be able to be added to the personal profile by the individual to whom the record pertains, by associating their personal identifier with their previous answers. However, the information previously entered will not be retrieved by that individual. Surgeon's Office staff will not retrieve information by personal identifier, but by the criteria created by the resulting score of each individual, based upon the answers provided in the survey. Follow-up data will also be retrieved according to date of initial injection; not by personal identifiers.

**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.

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

(3) Retention Instructions.

Medical, Preventative Defense (7-10 years)

**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. §§ 301 and 302; 10 U.S.C. Chapter 55, Medical and Dental Care; Executive Order 12196; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs), DoDD 6200.04, Force Health Protection

**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.

The COVID-19 Immunization Tracker is wholly internal to USAFRICOM. All information is collected from USAFRICOM staff members (staff of the Command Surgeon's Office). In the future, if any information from the COVID-19 Immunization Tracker is shared with another system or program, that system or program that program or system must comply with the OPM GOVT-10 SORN, and will require a separate PIA.

**SECTION 2: PII RISK REVIEW**

**a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)**

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Biometrics                     | <input type="checkbox"/> Birth Date                                       | <input type="checkbox"/> Child Information                                  |
| <input type="checkbox"/> Citizenship                    | <input type="checkbox"/> Disability Information                           | <input type="checkbox"/> DoD ID Number                                      |
| <input type="checkbox"/> Driver's License               | <input type="checkbox"/> Education Information                            | <input type="checkbox"/> Emergency Contact                                  |
| <input type="checkbox"/> Employment Information         | <input type="checkbox"/> Financial Information                            | <input type="checkbox"/> Gender/Gender Identification                       |
| <input checked="" type="checkbox"/> Home/Cell Phone     | <input type="checkbox"/> Law Enforcement Information                      | <input type="checkbox"/> Legal Status                                       |
| <input type="checkbox"/> Mailing/Home Address           | <input type="checkbox"/> Marital Status                                   | <input checked="" type="checkbox"/> Medical Information                     |
| <input type="checkbox"/> Military Records               | <input type="checkbox"/> Mother's Middle/Maiden Name                      | <input type="checkbox"/> Name(s)  |
| <input type="checkbox"/> Official Duty Address          | <input checked="" type="checkbox"/> Official Duty Telephone Phone         | <input type="checkbox"/> Other ID Number                                    |
| <input type="checkbox"/> Passport Information           | <input checked="" type="checkbox"/> Personal E-mail Address               | <input type="checkbox"/> Photo  |
| <input type="checkbox"/> Place of Birth                 | <input type="checkbox"/> Position/Title                                   | <input type="checkbox"/> Protected Health Information (PHI) <sup>1</sup>    |
| <input type="checkbox"/> Race/Ethnicity                 | <input type="checkbox"/> Rank/Grade                                       | <input type="checkbox"/> Religious Preference                               |
| <input type="checkbox"/> Records                        | <input type="checkbox"/> Security Information                             | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input checked="" type="checkbox"/> Work E-mail Address | <input type="checkbox"/> If Other, enter the information in the box below |   |

While age information will be collected, that information will be age categories in order to determine susceptibility to severe symptoms, and Specific dates of birth or a specific ages of individuals are not collected.

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current (dated within two (2) years) DPCLTD approved SSN Justification on Memo in place?

- Yes  No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

The COVID-19 Immunization Tracker does not collect or use SSNs.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?  
If "No," explain.

- Yes  No

The COVID-19 Immunization Tracker does not collect or use SSNs.

**b. What is the PII confidentiality impact level<sup>2</sup>?**  Low  Moderate  High

<sup>1</sup>The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.

<sup>2</sup>Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically

conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

**c. How will the PII be secured?**

(1) Physical Controls. *(Check all that apply)*

- |  |   |
|--|---|
| <input type="checkbox"/> Cipher Locks      | <input type="checkbox"/> Closed Circuit TV (CCTV)                         |
| <input type="checkbox"/> Combination Locks | <input type="checkbox"/> Identification Badges                            |
| <input type="checkbox"/> Key Cards         | <input type="checkbox"/> Safes  |
| <input type="checkbox"/> Security Guards   | <input type="checkbox"/> If Other, enter the information in the box below |

Locked room with restricted access. Only person with key can provide access to cleared personnel at pre-arranged time.

(2) Administrative Controls. *(Check all that apply)*

- Backups Secured Off-site
- Encryption of Backups
- Methods to Ensure Only Authorized Personnel Access to PII
- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- If Other, enter the information in the box below

(3) Technical Controls. *(Check all that apply)*

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Biometrics                            | <input checked="" type="checkbox"/> Common Access Card (CAC)              | <input checked="" type="checkbox"/> DoD Public Key Infrastructure Certificates  |
| <input checked="" type="checkbox"/> Encryption of Data at Rest | <input checked="" type="checkbox"/> Encryption of Data in Transit         | <input checked="" type="checkbox"/> External Certificate Authority Certificates |
| <input checked="" type="checkbox"/> Firewall                   | <input checked="" type="checkbox"/> Intrusion Detection System (IDS)      | <input checked="" type="checkbox"/> Least Privilege Access                      |
| <input checked="" type="checkbox"/> Role-Based Access Controls | <input type="checkbox"/> Used Only for Privileged (Elevated Roles)        | <input type="checkbox"/> User Identification and Password                       |
| <input type="checkbox"/> Virtual Private Network (VPN)         | <input type="checkbox"/> If Other, enter the information in the box below |   |

**d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?**

**SECTION 3: RELATED COMPLIANCE INFORMATION**

**a. Is this DoD Information System registered in the DoD IT Portfolio Repository (DITPR) or the DoD Secret Internet Protocol Router Network (SIPRNET) Information Technology (IT) Registry or Risk Management Framework (RMF) tool<sup>3</sup>?**

- |  |                                    |                                    |
|--|------------------------------------|------------------------------------|
| <input checked="" type="checkbox"/> Yes, DITPR | DITPR System Identification Number | <input type="text" value="17262"/> |
| <input type="checkbox"/> Yes, SIPRNET          | SIPRNET Identification Number      | <input type="text"/>               |
| <input type="checkbox"/> Yes, RMF tool         | RMF tool Identification Number     | <input type="text"/>               |
| <input type="checkbox"/> No                    |                                    |                                    |

If "No," explain.

**b. DoD information systems require assessment and authorization under the DoD Instruction 8510.01, "Risk Management Framework for DoD Information Technology".**

Indicate the assessment and authorization status:

- |  |               |  |
|--|---------------|--|
| <input checked="" type="checkbox"/> Authorization to Operate (ATO) | Date Granted: | <input type="text" value="4/11/2018"/> |
| <input type="checkbox"/> ATO with Conditions                       | Date Granted: | <input type="text"/>                   |
| <input type="checkbox"/> Denial of Authorization to Operate (DATO) | Date Granted: | <input type="text"/>                   |
| <input type="checkbox"/> Interim Authorization to Test (IATT)      | Date Granted: | <input type="text"/>                   |

(1) If an assessment and authorization is pending, indicate the type and projected date of completion.

ATO Renewal in progress, projected completion April 2021

(2) If an assessment and authorization is not using RMF, indicate the projected transition date.

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

- Yes     No

If "Yes," Enter UII  If unsure, consult the component IT Budget Point of Contact to obtain the UII

<sup>3</sup>Guidance on Risk Management Framework (RMF) tools (i.g., eMASS, Xacta, and RSA Archer) are found on the Knowledge Service (KS) at <https://rmfks.osd.mil>.