

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:

Blackboard Learn Ultra (BLU IL4)

2. DOD COMPONENT NAME:

Defense Counterintelligence and Security Agency

3. PIA APPROVAL DATE:

12/19/25

National Center for Credibility Assessment

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.

This software solution is fully integrated into a LMS SaaS that encompasses asynchronous, synchronous, and blended/hybrid classes, virtual live events. This software solution is considered a Student Information System (SIS) with automated administrative and tracking capabilities. The type of personal information collected:

-Student ID Number (randomly generated)
- Name
- Agency (Approved Unclassified Abbreviation)
- Email
- Phone number
- Emergency Contact
- DOB
- Gender/Gender Identification

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)

Minimum PII collected for course registration, training records verification/matching for personnel, and training 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.

Minimal information required for records management. Information to us is provided by the student. The student must submit an application to attend course based on job requirements. Information obtained through the application and is used to create the student profile and additional information can be provided by student directly into BLU.

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.

Minimal information required for records management. Information to us is provided by the student. The student must submit an application to attend course based on job requirements. Information obtained through the application and is used to create the student profile and additional information can be provided by student directly into BLU.

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

You are accessing a U.S. Government (USG) Information System (IS) that is provided for USG-authorized use only. By using this IS (which includes any device attached to this IS), you consent to the following conditions:

- The USG routinely intercepts and monitors communications on this IS for purposes including, but not limited to, penetration testing, COMSEC monitoring, network operations and defense, personnel misconduct (PM), law enforcement (LE), and counterintelligence (CI) investigations.
- The USG may inspect and seize data stored on this IS at any time.
- Communications or data stored on this IS are not private and are subject to routine monitoring, interception, search, and may be disclosed or used for any USG authorized purpose.
- This IS includes security measures (e.g., authentication and access controls) to protect USG interests, not for your personal benefit or privacy.

Information collected is consistent with the following Privacy Act Statement:

Authority: Title 5, United States Code (USC), Section 301; Executive Order 10450, "Security Requirements for Government Employment;" Executive Order 9397, "Numbering System for Federal Accounts Relating to Individual Persons;" Executive Order 10865, "Safeguarding Classified Information within Industry;" and DoD Directive 5105.42, "Defense Security Service.

Purpose: The purpose and use of the requested information is for the National Center for Credibility Assessment (NCCA) to establish and retain a permanent enrollment record of students, course completions, certifications, and academic credits/transcripts.

Routine Uses: In addition to those disclosures generally permitted under 5 USC 552a (b) of the Privacy Act, Executive Order 9397, and Public Law 104-134 (April 26, 1996), the NCCA Blackboard student account is routinely used by NCCA as a numerical identifier for students. The account is also used as an identifier for candidates and holders of professional certifications. NCCA uses personally identifiable information (PII) to respond to requests, inquiries, and to provide services and features offered on, or through, our learning management system (Blackboard). We will also use PII (i.e., emails, hard copy mailings, etc.) to communicate timely information and special offers about NCCA products, services, and events of interest. Additional routine uses are outlined in DoD-0005, Defense Training Records (<https://www.federalregister.gov/documents/2020/12/28/2020-26548/privacy-act-of-1974-system-of-records>) into the Privacy Act Statement portion of the PIA (as well as directly in BLU)

Disclosure: Furnishing data is voluntary, but failure to provide the requested information will impede, delay, or prevent further processing of the request.

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.

Training records to specific student and/or supervisor of assigned federal agency by official request. DCSA, Security Training, National Center for Credibility Assessment.

☒ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

Training records to specific student and/or supervisor of assigned federal agency by official request. Army, Air Force, Navy, Coast Guard, NRO, NGA, NSA, DIA.

☒ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

Specify.

Training records to specific student and/or supervisor of assigned federal agency by official request. ATF, CBP, DEA, Department of Energy, Department of Interior, Department of Justice, Department of State, FBI, CIA, FDA, FDIC, Homeland Security, ICE, IRS, NRC, TSA, USPS, USPS, USSS, VA OIG, USPS, TSA

☐ 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.

Carney: 52.224-3, Privacy Training (Jan 2017) (5 U.S.C. 552a).
August Schell Enterprises 52.224-3 Privacy Training. Jan 2017
52.224-3 Privacy Training. (Alternate I) Jan 2017
Alternate I Jan 2017(i) 52.224-3 Privacy Training (Jan 2017) (5 U.S.C. 552 a).(62) 52.239-1, Privacy or Security Safeguards (Aug 1996) (5 U.S.C. 552a).(A) 52.224-3, Privacy Training (Jan 2017) (5 U.S.C. 552a).(B) Alternate I (Jan 2017) of 52.224-3.

☐ 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)

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

The information provided by student will be pushed by the agency to maintain student record. Current process utilizing an application form submitted through email.

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- | | |
|--|--|
| <input checked="" 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 information provided by student will be pushed by the agency to maintain student record. Current process utilizing an application submitted through email.

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.

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.

Student records will be retained until no longer needed. Students must start a new training record upon the eleventh year of inactivity as an examiner. Therefore, records must be obtained no less than twelve years from examiner deactivation date. ISSC Student Info Sheet Disposition Authority Number: DAA-0446-2013-0001-0010 from NARA Request for Records Disposition Retention Period Destroy when no longer needed.

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.

DoD-Wide Training Records SORN (DoD-0005); DOD 5210.91 and Security Executive Agent Directive (SEAD) - 2

5 U.S.C. Chapter 41, Training; 5 CFR part 410, Office of Personnel Management-Training; E.O. 11348, Providing for the Further Training of Government Employees, as amended by E.O. 12107, Relating to the Civil Service Commission and Labor-Management in the Federal Service; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 1746 Defense Acquisition University; 10 U.S.C.1747, Acquisition Fellowship Program; DoD Instruction 1215.08 Senior Reserve Officers Training Corp Programs; DoD Directive 1322.18, Military Training; DoD Directive 1322.08E, Voluntary Education Programs for Military Personnel; DoD Instruction 1322.26, Distributed Learning; DoD Instruction 1322.25, Voluntary Education Program; DoD Instruction 1322.9, Job Training, Employment Skills Training, Apprenticeships, and Internships (JTEST-AI) for Eligible Service Members; DoD Instruction 1430.16, Growing Civilian Leaders; DoD Instruction 5132.13, Staffing of Security Cooperation Organizations (SCOs) and the Selection and Training of Security Cooperation Personnel; DoD Instruction 1215.21, Reserve Component (RC) Use of Electronic-based Distributed Learning; Directive-Type Memorandums 13-004, Operation of the DoD Financial Management Certification Program Methods for Training; and DoD Instruction 1015.2, Military Morale, Welfare and Recreation (MWR), DoD Instruction 1300.26, Operation of the DoD Financial Management Certification Program; and E.O. 9397.

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.

Per DCSA Information Management Collections Officer, NCCA will only be collecting minimal information and does not require an OMB control number.