

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:

DCSA Cybersecurity Workforce Compliance Manager (CWCM)

2. DOD COMPONENT NAME:

Defense Counterintelligence and Security Agency

3. PIA APPROVAL DATE:

02/11/2026

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.

The purpose of DCSA Cybersecurity Workforce Compliance Manager (CWCM) is to capture and continuously monitor Agency-wide cybersecurity workforce compliance documentation necessary to validate and authorize access to DCSA information resources and report metrics to Agency Senior leaders and DoD CIO in accordance with DoD Directive 8140.01 and DoDM 8140.03. CWCM will actively track compliance requirements for all DCSA users. The types of personal information collected in the system are employment information, work e-mail addresses, education information, position/title, rank/grade, DoD ID numbers, supervisors, unit ID numbers, CAC card ID numbers, cyber work role coding, and names.

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)

Verification of individuals training records and relationship to DCSA organization.

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 cannot directly object to the collection of their PII, but they consent to providing their PII for system access via the DD Form 2875, where the PII originates from.

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.

Individuals cannot directly consent to the specific use of their PII, but they consent to providing their PII for system access via the DD Form 2875, where the PII originates from.

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

This system is not asking individuals to provide PII directly. The PII originates from DD form 2875, which contains the following Privacy Act Statement.

AUTHORITY: Public Law 99-474, the Computer Fraud and Abuse Act

PRINCIPAL PURPOSE(S): To record names, signatures, and other identifiers for the purpose of validating the trustworthiness of individuals requesting access to Department of Defense (DoD) systems and information. NOTE: Records may be maintained in both electronic and/or paper form.

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. Acquisition Technology Cybersecurity (ATC) and Human Capital Management Office (HCMO)
- Other DoD Components (i.e. Army, Navy, Air Force) Specify. _____
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) 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. WillCo Tech / Project Hosts Contractor personnel performing activities associated with maintaining a system of records on behalf of a DoD component shall complete PII training in accordance with DoDI 5400.11, DoD 5400.11-R, and OMB Circular A-130.
- 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

PII comes from the Common Access Card (CAC) registration with the system, CyberStar (the company and the commercial product name of DCSA's CWCM system), and feeds from Defense Civilian Personnel Data System (DCPDS). PII is collected on DD Form 2875.

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

PII comes from the Common Access Card (CAC) registration with the system, CyberStar (the company and the commercial product name of DCSA's CWCM system), and feeds from Defense Civilian Personnel Data System (DCPDS). PII is collected on DD Form 2875.

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://dpclid.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.

Temporary. Destroy when 3 years old, or 3 years after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use. Temporary; Destroy when business use ceases.

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.

Privacy Act of 1974
 Public Law 99-474, the Computer Fraud and Abuse Act
 Freedom of Information Act (FOIA) 1966
 10 U.S.C. 2222, Defense Business Systems: Business Process Reengineering; Enterprise Architecture; Management; 10 U.S.C. 2224, Defense Information Assurance Program; 10 U.S.C. Chapter 8-Defense Agencies and Department of Defense Field Activities; 31 U.S.C. 902, Authority and functions of agency Chief Financial Officers; Homeland Security Presidential Directive (HSPD) 12, Policies for a Common Identification Standard for Federal Employees and Contractors, August 27, 2004; OMB M-19-17, Enabling Mission Delivery through Improved Identity, Credential, and Access Management; National Institute of Standards and Technology (NIST) Federal Information Processing Standard (FIPS) 201-2, Personal Identity Verification (PIV) of Federal Employees and Contractors; DoD Instruction 8320.02, Sharing Data, Information, and Information Technology (IT) Services in the Department of Defense; DoD Instruction 8320.07, Implementing the Sharing of Data, Information, and Information Technology (IT) Services in the Department of Defense; and DoD Instruction 8520.03, Identity Authentication for Information Systems.

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.

Information is not collected from members of the public.