Adapted Privacy Impact Assessment (PIA)

**Step 1: Determination of Need**
- **Action Officer, CISO, and CPO**
- **Needed:**
  1. Electronic Information System collects, maintains, uses, or disseminates PII
  2. Third-party website or application may make PII available to DoDEA
- **Not Needed:**
  1. No PII is collected
  2. Existing and up-to-date PIA (review every 3 years)

**Step 2: SME Coordination**
- **Action Officer**
  2. Coordinate with CPO and CISO.

**Step 3: CISO Review**
- **Chief Information Security Officer (CISO)**
- Review/sign and confirm compliance with DoD cybersecurity policies.
- 1. Obtain Records Management concurrence (RMO ensures appropriate lifecycle management of records in accordance with DoD Instruction 5015.02, DoD Records Management Program).
  2. Review/sign and confirm compliance with DoD Directive 5400.11, DoD Privacy Program.
  3. Obtain SAOP concurrence/signature.

**Step 4: CPO Review**
- **Component Privacy Officer (CPO)**
- 1. Obtain Records Management concurrence (RMO ensures appropriate lifecycle management of records in accordance with DoD Instruction 5015.02, DoD Records Management Program).
  2. Review/sign and confirm compliance with DoD Directive 5400.11, DoD Privacy Program.
  3. Obtain SAOP concurrence/signature.

**Step 5: CIO Review**
- **Chief Information Officer (CIO)**
- 1. Conduct final review and approval and confirm compliance with Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications.
  2. Retain in central IT repository and send final copy to CPO (HQ: Privacy@DoDEA.EDU).

**Step 6: Publishing**
- **Component Privacy Officer (CPO)**
- 1. Publish a copy on the DoDEA Privacy page, omitting signature page (https://www.dodea.edu/Off ices/ExecutiveServices/privacy.cfm)
  2. Submit an electronic copy to the OSD Privacy Office (osd.mc-alex.dod- cio.mbx.pia@mail.mil)

**General Guidelines:**
1. The adapted PIA is required whenever an agency’s use of a third-party website or application makes PII available to the agency.
2. The above process is applicable regardless of PII risk level (Low/Medium/High Risk).

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