

## 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:**

Military Child Development Program Workforce Study

**2. DOD COMPONENT NAME:**

Under Secretary of Defense for Personnel and Readiness

**3. PIA APPROVAL DATE:**

11/25/24

Deputy Assistant Secretary of Defense, Military Community & Family Policy (MC&FP)

### 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.)

- |   |  |
|---|--|
| <input type="checkbox"/> From members of the general public                                       | <input type="checkbox"/> From Federal employees                          |
| <input checked="" type="checkbox"/> from both members of the general public and Federal employees | <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 checked="" type="checkbox"/> New Electronic Collection |
| <input 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.**

High quality, affordable child care is a challenge for many working families in the United States, and, as such, is a priority for government investment. The need for affordable, accessible child care is particularly important for the Department of Defense (DoD), given its possible impacts on mission readiness and military personnel retention. The Department's Child Development Program (CDP) is a large, complex enterprise that included approximately 24,500 CDP staff employed in more than 700 facilities in FY21. Multiple stakeholders benefit from this program, which must be responsive to continually evolving operational requirements. However, those tasked with program operations and oversight have wrestled with insufficient capacity to meet the demand for child care, as reflected by over 16,500 children on military child care wait lists.

The Office of the Deputy Assistant Secretary of Defense, Military Community & Family Policy (MC&FP) has, therefore, partnered with RAND's National Defense Research Institute (NDRI) to analyze, identify, and offer solutions for factors contributing to the staffing issues that appear to influence the long wait lists for child care. The overall goal of the project is to collect information that will allow the Department to evaluate and then make informed decisions on ways to improve the strategies currently in use to recruit, train, and retain qualified staff within the CDP.

As one component of this project, RAND will conduct case studies of the CDP at up to six installations. For each case study, we will collect information by conducting semi-structured interviews with CDP personnel and community-based organizations as well as a review of documents and workforce data. This will include:

- Installation and CDP leaders and subject matter experts,
- Direct care professionals (including direct care staff and Family Child Care Program providers),
- Support staff, and
- Community-based organizations working with the military fee assistance program (e.g., Child Care Aware).

In order to facilitate scheduling and management of interviews with these individuals, the following information will be collected: full name, work telephone number, work email address, and employment information (e.g., job title, position, child care setting, length of time served in their current position and in the military CDP in general) of prospective participants. This information will be used to explain the study to participants, schedule the interview, and provide consent materials in advance of the interviews. This information may also be used to ensure important attributes are appropriately represented across the interview sample. All data captured from these interviews will be collected and maintained in a de-identified manner.

Additionally, RAND will also conduct an online survey of the CDP workforce, on behalf of the Department, specifically those employed at child development centers (CDCs) serving children from birth to kindergarten entry and school-age care (SAC) available to children up through age 12. The information collected will provide valuable insights into the importance of various factors—pay, non-cash benefits,

working conditions, leadership practices, other labor market opportunities, among others—and the decisions that CDP workforce members make regarding their recruitment, professional development, career advancement, and continued employment in the CDP. Ultimately, the final survey will be anonymous. However, as part of the survey development process, the study team will conduct a pilot test that entails cognitive interviews with a small number (nine or fewer) current or former members of the CDP workforce. In order to provide the pilot test materials and schedule the interviews, the following information will be collected and maintained on these pilot participants: full name, work telephone number, and work email addresses.

**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)

Identification and 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.

Individuals may object to the collection. However, failure to provide the requested information will prohibit further participation in the study.

**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.

Once the individuals provide their PII they do not have the opportunity to consent to the specific uses, however, the information will only be used for those uses identified above and explained to the participants upon initial consent for participation.

**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

Privacy Act Statement

AUTHORITY: 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 2358, Research and development projects; Public Law 117-263, "National Defense Authorization Act for Fiscal Year 2023, Section 644, Military Installations with Limited Child Care: Briefing; Executive Order 14095 "Increasing Access to High-Quality Care and Supporting Caregivers," DoD Instruction (DoDI) 1100.13, DoD Surveys; and DoDI 6060.02, Child Development Programs (CDPs).

PURPOSE: To facilitate communication, scheduling, and delivery of study materials to study participants. This information may also be used to ensure important attributes are appropriately represented across the interview samples.

ROUTINE USES: Disclosure of records are generally permitted under 5 U.S.C. 522a(b) of the Privacy Act of 1974, as amended. Pursuant to 5 U.S.C. 522a(b)(3), records may be disclosed as a routine use to contractors, grantees, experts, consultants, students, and other performing or working on a contract, service, grant, cooperative agreement, or other assignment for the federal government when necessary to accomplish an agency function related to this system of records. A complete list of routine uses may be found in the applicable System of Records Notice DHRA 03, Survey Data and Assessment at: <https://www.federalregister.gov/documents/2021/07/28/2021-16054/privacy-act-of-1974-system-of-records>.

DISCLOSURE: Voluntary. However, failure to provide requested information may prohibit further participation in the study.

**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.

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. RAND's National Defense Research Institute (NDRI) (contract includes FAR 52.224-1 and 52.224-2; Qualtrics (sub-contractor))

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 |   |

**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 checked="" type="checkbox"/> In-Person Contact                             | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax  | <input checked="" type="checkbox"/> Telephone Interview                        |
| <input type="checkbox"/> Information Sharing - System to System                   | <input checked="" type="checkbox"/> Website/E-Form                             |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) |  |

**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.

Temporary. Cut off upon completion of research project. Destroy 30 years after cutoff.

**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.

10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 2358, Research and development projects; Public Law 117-263, "National Defense Authorization Act for Fiscal Year 2023, Section 644, Military Installations with Limited Child Care: Briefing; Executive Order 14095 "Increasing Access to High-Quality Care and Supporting Caregivers," DoD Instruction (DoDI) 1100.13, DoD Surveys; and DoDI 6060.02, Child Development Programs (CDPs).

**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.

Pending publication in the Federal Register.