Questions For ASD/NII (DoD CIO) regarding DoD PIA Memo

No.	Reference (DoD PIA memo)	Question	Response
1	p. 2/para. 3.5	Can the Component CIO be both the approver of PIAs and the Reviewing Official?	Yes
2	p. 2/para. 3.6 p. 4/para. 8.1.4	Does this guidance cover only those systems tied to the budget?	This guidance covers **all** new or significantly altered Information Technology (IT systems or projects that collect, maintain, or disseminate personal information from or about members of the public - excluding information on DoD personnel).
3	p. 3/para. 3.5	In this para., the Component CIO is given discretion to consult with the Privacy Officer while reviewing the PIA. In an email discussing the DoD PIA memo, the DoD Privacy Act Official says that the DoD policy requires that the Privacy Officer coordinate on PIAs prior to their submission for approval to the Component CIO.	The guidance states that the PIA will be forwarded to the DoD Component Reviewing Official, which shall be the Component CIO, who in consultation with both the Component Information Assurance Official and the Privacy Officer, or their designees, shall review the PIA for approval. While it is strongly encouraged that PIAs are prepared in consultation with privacy and IA officials – this is at the discretion of the preparing official.
4	p. 3/para. 3.5; p. 4/para. 8.1.1	Can the Component CIO delegate Reviewing Official responsibilities? Can the CIO delegate any of the other CIO responsibilities (e.g., posting the approved PIAs on the Component Web site)?	Yes. However, the designee should be at a senior level (e.g. deputy) and the Component Reviewing Official is still ultimately responsible.
5	p. 3/para. 3.7.1	Who is the Approving Official?	Component CIO
6	N/A	Can PIAs performed prior to release of DoD PIA guidance be grandfathered or are Components required to update them immediately according to new guidance? If PIAs must be updated, what is the deadline for doing so?	PIAs released prior to the release of the DoD guidance should comply with OMB's 2003 implementing PIA guidance. DoD's guidance is consistent with the OMB guidance.
7	N/A	How does DoD PIA scoring fit into the new PIA process/format?	What scoring process?
		How do I know if a data collection qualifies for a PIA?	Talk to your records management person. If the collection requires an "Information Collection Request", the data will be collected electronically, and it contains personal information on non-DoD personnel, then it most likely qualifies for a PIA.