



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Retirement Points Accounting System (RPAS)
--

US Army Deputy Chief of Staff for Personnel / Human Resources Command (HRC)

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR Enter DITPR System Identification Number 3840 (APMS ID DA00190)
- Yes, SIPRNET Enter SIPRNET Identification Number []
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes No
- If "Yes," enter UPI 007-21-01-2002-2320-00

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes No
- If "Yes," enter Privacy Act SORN Identifier A0600-8-104 AHRC (Update pending)

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office []
Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

Title 10 US Code Section 3013 (Secretary of the Army); Title 42 US Code Section 10606; Executive Order 9397 as amended (SSN); AR 140-185, Training and Retirement Point Credits and Unit Level Strength; and AR 600-8-104, Military Personnel Information Management/Records.

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The Retirement Points Accounting System (RPAS) updates TAPDB-R with online entries and batch processes using input from external and internal interfaces. RPAS provides for recording and maintaining retirement points earned by soldiers during their entire careers. RPAS automatically produces annual retirement point statements, revised statements, terminal statements for individuals who become losses to USAR strength, Twenty Year Letters, and Non-Participation Letters. A historical record is maintained for all retirement points credited annually to Army Reserve Soldiers. This record supports the issuance of official Statements of Service and Certifications of Eligibility for Retired Pay, and for replying to routine inquiries. RPAS identifies officers that are non-participants but eligible for retired pay at age 60. RPAS also supports the Survivor Benefit Plan (SBP). A SBP packet is mailed to eligible reservists, and elected options are recorded IAW Public Law 95-3097. The RPAS screens provide the user with the capability to request statistical reports using data from TAPDB-R, and to interactively update TAPDB-R RPAS data elements. The system receives PCARS transactions containing Inactive/Active Duty training data from DFAS-Indianapolis, and Training and Education Data System (TREDS) transactions containing correspondence course completion data from the Army Training Support Center (ATSC). It also receives RCCS data transactions from client-server applications, consisting of Corrected Summary records originating from units. RPAS sends Retired Pay Eligibility data to DFAS-Cleveland. The TAPDB-R-related data elements are updated as a by-product of these actions.

Personal information maintained by the system includes personal, medical, and military.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

All systems and environments have threats that seek to exploit and cause harm to the information. Some threats are natural, some are inherent in the system design, some can be attributed to unauthorized personnel, and some to authorized personnel who make mistakes. Four general categories of threats exist: human-intentional, human-unintentional, structural, and natural. The system is maintained in a controlled facility. Appropriate technical, personnel, physical and operational safeguards are in place for the access, collection, use and protection of information. Due to the level of safeguarding, we believe the risk to individuals' privacy to be minimal.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

Staff principals in the chain of command, the Department of the Army Inspector General, the Army Audit Agency, Army Reserve Components, the US Army Criminal Investigation Command, the US Army Intelligence and Security Command, the Provost Marshall General, and the Assistant Secretary of the Army for Financial Management and Comptroller.

Other DoD Components.

Specify.

The Defense Finance and Accounting Service (DFAS), the Department of Defense Inspector General, and the Defense Criminal Investigative Service.

Other Federal Agencies.

Specify.

N/A

State and Local Agencies.

Specify.

N/A

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

Science Applications International Corporation contractual language acknowledges the sensitivity of PII and describes the importance of protecting and maintaining the confidentiality and security of a Soldier's PII. The contractual language keys on training as a fundamental element in creating awareness and understanding of PII and why it is important to control and safeguard. The language also stresses securing PII material and equipment housing PII at the end of a work day. Contractual language directs and requires each SAIC employee in support of the system to have a valid Secret clearance prior to working on the program. The contract specifically states that contractor personnel will adhere to the Privacy Act, Title 5 of U.S. Code Section 522a, and all applicable agency rules and regulations.

Other (e.g., commercial providers, colleges).

Specify.

N/A

i. Do individuals have the opportunity to object to the collection of their PII?

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

N/A

(2) If "No," state the reason why individuals cannot object.

Since data are not collected directly from individual Soldiers they are not provided either a Privacy Act Statement or a Privacy Advisory from RPAS. However, Soldiers implicitly consent to capture and use of that information at the time of employment or enlistment in the Department of the Army, at which time they are provided a Privacy Advisory.

j. 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.

N/A

(2) If "No," state the reason why individuals cannot give or withhold their consent.

Since data are not collected directly from individual Soldiers they are not provided an opportunity to consent to its use by RPAS. However, Soldiers implicitly consent to capture and use of that information at the time of employment or enlistment in the Department of the Army, at which time they are provided a Privacy Advisory. Note that third party requests for release of PII are not honored by RPAS unless the affected individuals submit written authorizations to allow release of their information to the third parties.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|--|---|
| <input type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input checked="" type="checkbox"/> None |

Describe each applicable format.

Since data are not collected directly from individual Soldiers they are not provided either a Privacy Act Statement or a Privacy Advisory from RPAS. However, Soldiers implicitly consent to capture and use of that information at the time of employment or enlistment in the Department of the Army, at which time they are provided a Privacy Advisory.