PRIVACY IMPACT ASSESSMENT (PIA)

For the

Army Records Information Management System (ARIMS)
Office of the Administrative Assistant (OAA) to Secretary of the Army U.S. Army Records Management & Declassification Agency

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**
- ☐ **New Electronic Collection**
- ☒ **Existing DoD Information System**
- ☐ **Existing Electronic Collection**
- ☐ **Significantly Modified DoD Information System**

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: DITPR #625 (APMS/AITR #DA05323)
- ☐ **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

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: A0025-55 OAA and A0025-400-2 OAA

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.: 9/2/2011

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.

10 U.S.C. 3013, Secretary of the Army; 44 U.S.C. Sections 3301–3314, the Federal Records Act; Executive Order 13526—Classified National Security Information Memorandum of December 29, 2009—Implementation of the E.O. 'Classified National Security Information' Order of December 29, 2009—Original Classification Authority; DoDD 5015.2, DoD Records Management Program; Army Regulation 25-400-2, The Army Records Information Management System; and E.O. 9397 (SSN), as amended.

In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, these records contained therein may specifically be disclosed outside the DOD as a routine use pursuant to 5 U.S.C. 552a (b) (3) as follows:

The DoD 'Blanket Routine Uses' set forth at the beginning of the Army's compilation of systems of records notice also apply to this system.

To the Department of Veterans Affairs to verify military service for claims filed by the veteran.

NOTE: This system of records contains individually identifiable health information. The DoD Health Information Privacy Regulation (DoD 6025.18-R) issued pursuant to the Health Insurance Portability and Accountability Act of 1996, applies to most such health information. DoD 6025.18-R may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this system of records notice.

Freedom of Information Act Program Files (December 8, 2005, 70 FR 72996).

5 U.S.C. 552, Freedom of Information Act, as amended by Pub.L. 93-502; 5 U.S.C. 301, Departmental Regulations, 10 U.S.C. 3013, Secretary of the Army; Army Regulation 25-55, The Department of the Army Freedom of Information Act Program; and E.O. 12958, National Classified Security Information, as amended.

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.

ARIMS is the Army's centralized system for the identification, collection, and preservation of long-term electronic and hard copy records. The Secretary of the Army directed that ARIMS be used to preserve, protect and retrieve Army records to ensure compliance with governing statues (44 USC and 36 CFR), DoD directives (DoD 5015.2), Army Regulations (AR-25-1 and AR 25-400-2) and other lawful purposes. PII in ARIMS consists of personal information contained on individuals in a variety of record copies pertaining to diverse subject matter as well as user names and account information. ARIMS is comprised of multiple business applications including the Freedom of Information Act Case Tracking System (FACTS) which is used to record the receipt and processing of FOIA and Privacy requests, Army Declassification Automated Management System (ADAMS) which is used to record documents that are being reviewed for declassification IAW EO 13526; JSRRC Claims Automated Processing System (JCAPS) which is used to manage research of requests received from veterans in support of disability compensation claims based on the Army's responsibility as the Executive Agent; Digital Asset Finder (DAF) which is a document storage and retrieval system.

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

Records in the system and registered user account profiles are only available to responsible records officials and system administrators. ARIMS users are authenticated by Army Knowledge Online (AKO) and CAC Login for access to the system.

Due to the level of safeguarding, we believe the risk to individuals' privacy to be minimal. The risk associated with providing an individual the opportunity to object or consent is that the individual's personal information cannot be maintained, updated, or verified.

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. All Army components and major commands which includes Active, Army Accessions Command, Army Audit Agency, Army Cadet Command, Army Criminal Investigation Command, Army Deputy Chief of Staff for Personnel, Army G1, Army Inspectors General, Army Intelligence and Security Command, Army Recruiting Command, Army Recruiting Information Support System, Army Research Institute, Army Reserve Command and to Commanders, Army Reserves, Army Training and Doctrine Command, Assistant Secretary of the Army (Financial Management & Comptroller), Department of the Army Inspectors General, Provost Marshal General, Army

Staff Principals in the chain of command, and Supervisors and their designated human resources and administrative personnel responsible for processing personnel actions.

☒ **Other DoD Components.**

Specify. Defense Criminal Investigative Service, Defense Finance and Accounting Service, Defense Integrated Military Human Resources System, Defense Manpower Data Center, Defense Security Service, DoD Inspector General, Medical Command, National Guard Bureau, Office of the DoD Inspector General, Office of the Secretary of Defense, Office of the Secretary of Defense Personnel and Readiness, and U.S. Military Entrance Processing Command and other Military Services as requested.

☒ **Other Federal Agencies.**

Specify. Department of Veterans Affairs (VA) and National Archives and Records Administration (NARA)

☐ **State and Local Agencies.**

Specify.

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

Specify. Intergraph Government Solutions
Personal Data and Personally Identifiable Information (PII)
Compliance with Privacy Act
Contractor must comply with the Personally Identifiable Information requirements as set forth in the Privacy Act of 1974, Public Law 93-579, as amended, including all policies and directives issued therein including, for example, DoD Directive 5400-11, DoD Program dated May 8, 2007, as may also be amended from time to time or superseded.

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

Specify.

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.

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

Records on individuals are archived by records officers based on the official record retention schedule. This is an automatic process and individuals do not have an opportunity to object. Likewise, records collected for

declassification review and those collected in support in research of veterans claims are provided by Army and DoD organizations and NARA without involving the individual record subject.

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.

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

Records on individuals are archived by records officers based on the official record retention schedule. This is an automatic process and individuals do not have an opportunity to object. Likewise, records collected for delcassification review and those collected in support in research of veterans claims are provided by Army and DOD organizations and NARA without involving the individual record subject.

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

☐ **Privacy Act Statement** ☐ **Privacy Advisory**

☐ **Other** ☒ **None**

Describe each applicable format.