PRIVACY IMPACT ASSESSMENT (PIA)

For the

Army Benefits Center - Civilian

Office of the Assistant Army G-1 for Civilian Personnel

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: 2546 (DA05655)
- ☐ **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: A0690-200 DAPE

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 3206-0160; 3206-0230

Enter Expiration Date 08/31/2014; 08/31/2014

☐ **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.

5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 3013, Secretary of the Army; Army Regulation 690-200, General Personnel Provisions; and E.O. 9397 (SSN), 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.

Army Benefit Center-Civilian (ABC-C) is a data repository that is organized into three subsystems to facilitate administration, resource organization, maintenance, operation, and support. The system maintains current and historical information for over 300,000 active civilian employees. The data repository consists of databases, backups and history files. The mission of the ABC-C is to provide a full range of benefits and entitlements services to Army serviced employees through a centralized automated center.

The types of PII collected pertain to personal (SSN, birth date, gender, phone number, personal email address, mail address, etc.), medical, disability, military, financial, educational, and employment information. The intended use of PII is to process health insurance, retirement benefits, life insurance, savings plan, and other entitlements.

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

Internal and external risks are associated with the protection of PII; however, risks are minimized to an acceptable level. Safeguards are employed to detect and minimize unauthorized disclosure, modification, and/or destruction of data; thus the Office of the Assistant G-1 for Civilian Personnel has determined the risk to the individual's 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. Army Staff Principals in the chain of command, Department of Army Inspector General, Army Audit Agency, US Army Criminal Investigative Command, US Army Intelligence and Security Command, Provost Marshal General, Assistant Secretary of the Army for Financial Management and Comptroller, U.S. Army Garrisons at installations and Headquarters, U.S. Army Installation Management Command.

☒ **Other DoD Components.**

Specify. In order to correct or update an employee's personnel information, ABC-C may potentially share PII with any DoD Agency.

☒ **Other Federal Agencies.**

Specify. In order to correct or update an employee's personnel information, ABC-C may potentially share PII with any Federal Agency.

☐ **State and Local Agencies.**

Specify. In order to correct or update an employee's personnel information, ABC-C may potentially share PII with State Agencies.

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

Specify. Within our current Performance Work Statement (PWS), Civilian Information Services (CIS) adheres to publications and documents applicable to the contract. The Contractor shall comply with all applicable privacy documents and publications and all changes to them that are in effect at contract start date. Local supplements to any of these publications are also applicable to this contract. The PWS may set a higher standard of performance than an applicable Army regulation. The PWS will control over the regulations unless a particular PWS provision is in direct conflict with the applicable provision of the Army regulation. As outlined within AR 380-5, Department of the Army Information Security Program, the Computer Security Act of 1987 established requirements for protection of certain information in federal Government Automated Information Systems (AIS). This information is referred to as "sensitive" information, defined in the Act as: "Any information, the loss, misuse, or unauthorized access to or modification of which could adversely affect the national interest or the conduct of federal programs, or the privacy to which individuals are entitled under section 552a of Title 5, USC (the Privacy Act), but which has not been specifically authorized under criteria established by an Executive Order or an Act of Congress to be kept secret in the interest of national defense or foreign policy."

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

Specify. EconSys (ESI), Government Retirement Benefits, Federal Employees Health Benefits Provider Services

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.

An individual has the opportunity to object to the collection of their PII by refusing to submit corrected or updated information.

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

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.

Individuals give implicit consent to the use of their PII through the submission of their application.

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.

A Privacy Act statement is included on all paper and web forms. The Privacy Act Statements vary slightly from form to form. All forms are developed and published by OPM. Examples include:

SF 2801-2: Public Law 98-615, which establishes the spousal consent requirement, authorizes solicitation of this information. The data furnished will be used to determine the type of annuity awarded. The information may be shared and is subject to verification, via paper, electronic media, or through the use of computer matching programs with national, state, local or other charitable or social security administrative agencies in order to determine benefits under their programs, to obtain information necessary for determination or continuation of benefits under this program, or to report income for tax purposes. It may also be shared and verified, as noted above with law enforcement agencies when they are investigating a violation or potential violation of civil or criminal law. Executive Order 9397 (November 22, 1943) authorizes use of the Social Security number. Failure to provide information may delay or prevent action on your application.

SF 2802: Title 5, U.S. Code, Chapter 83, Civil Service Retirement, authorizes solicitation of this information. The data you furnish will be used to determine your eligibility to receive a refund of retirement deductions. The information may be shared and is subject to verification via paper, electronic media, or through the use of computer matching programs, with national, state, local, or other charitable or social security administrative agencies in order to determine and issue benefits under their programs or to report income for tax purposes. It may also be shared and verified, as noted above, with law enforcement agencies when they are investigating a violation or potential violation of civil or criminal law. Executive Order 9397 (November 22, 1943) authorizes the use of the Social Security Number to distinguish between the applicant and people with similar names. If you do not furnish your Social Security Number, OPM may be unable to determine your eligibility to receive a