



PRIVACY IMPACT ASSESSMENT (PIA)

For the

DoD Contractor Personnel Office (DCOPS) Contractor Online Processing System

Office of the Assistant 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
- 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
- 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

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

No spouse or child information from public. Collected from contractor employee.

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.

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).

Other Authorities

NATO SOFA Supplementary Agreement, Articles 72 and 73
Army in Europe Regulation AER 715-9, "Contractor Personnel in Germany-Technical Expert, Troop Care, and Analytical Support Personnel"
Army in Europe Regulation AER 600-700, "Identification Cards and Individual Logistic Support." Chapter 7

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.

DCOPS is a data entry and review system used to gather information necessary to qualify contractor employees of the US Forces for receipt of NATO SOFA status (identification card), thus enabling those contractor employees to enjoy the same privileges that the military and civilian component members have. DCOPS is the central data management system used by the DoD Contractor Personnel Office (DOCPER) to carry out the provisions of the bilateral agreements with Germany and Italy pertaining to granting status under the NATO Status of Forces Agreement ("SOFA status") to U.S. contractor employees. DCOPS manages applications made by contractor employees -- through Contracting Officer's Representatives working for the sponsoring agency -- to gain "SOFA status" working as Technical Expert, Analytical Support providers, Troop Care providers, Technical Representatives and 'other Civilian Personnel'.

The type of PII collected pertains to educational data, employment data, and family information: name, citizenship, mailing/home address, marital status, financial information, legal status, birth date, home telephone number, employment information, education information, social security number, gender, place of birth, personal email address, spouse information, child information, passport number. These are necessary to establish the qualifications for contractor employees to obtain NATO SOFA status.

(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 we believe 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.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

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

Specify.

Within our current Performance Work Statement (PWS), Army Civilian Information Services (CIS) adheres to publications and documents applicable to the contract. The Arrow Point contractors 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 have 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.

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.

By not providing the required PII, an individual objects to its collection. The Privacy Act Statement is provided on the DCOPS login page.

(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.

Consent to the specific uses of an individuals PII is given once they have submitted data into DCOPS. If an individual declines to enter data into DCOPS, there is no PII collected, and thus no PII can be used.

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

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 consent to monitoring notification is included in the DCOPS login page:

Attention this is a DoD computer system. Before processing classified information, check the security accreditation level of this system. Do not process, store, or transmit information classified above the accreditation level of this system. This computer system, including all related equipment, networks, and network devices (includes Internet access) are provided only for authorized U.S. government use. DoD computer systems may be monitored for all lawful purposes, including to ensure their use is authorized, for management of the system, to facilitate protection against unauthorized access, and to verify security procedures, survivability, and operational security. Monitoring includes, but is not limited to, active attacks by authorized DoD entities to test or verify the security of this system. During monitoring, information may be examined, recorded, copied, and used for authorized purposes. All information, including personal information, placed on or sent over this system may be monitored. Use of this DoD computer system, authorized or unauthorized constitutes consent to monitoring. Unauthorized use of this DoD computer system may subject you to criminal prosecution. Evidence of unauthorized use of collected during monitoring may be used for administrative, criminal, or other adverse action. Use of this system constitutes consent to monitoring for all lawful purposes.

A Privacy and Security Notice also states:

AUTHORITY: 10 U.S.C. 3013, Secretary of the Army; NATO SOFA Supplementary Agreement, Articles 72 and 73 between the United States of America and the Federal Republic of Germany; and E.O. 9397 (SSN).

PRINCIPAL PURPOSE: To ensure compliance with the established bilateral implementation of Articles 72 and 73 of the Supplementary Agreement to the NATO Status of Forces Agreement. These two Articles govern the accreditation in Germany of DOD contractor employees as members of the civilian component as Technical Experts (TE), Troop Care (TC) provider employees, and Analytical Support (AS) service workers.