

# PRIVACY IMPACT ASSESSMENT (PIA)

**PRESCRIBING AUTHORITY:** DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

**1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:**

WHS Electronic Records Manager (ERM) NIPRNET

**2. DOD COMPONENT NAME:**

Washington Headquarters Service

**3. PIA APPROVAL DATE:**

Executive Services Directorate/Directives Division and Acquisition Directorate

**SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)**

**a. The PII is:** (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- From members of the general public  From Federal employees  
 from both members of the general public and Federal employees  Not Collected (if checked proceed to Section 4)

**b. The PII is in a:** (Check one.)

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

**c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.**

WHS ERM is an electronic records management system that stores records of WHS/ESD/Directives Division and WHS/AD in separate datasets. Each dataset is only accessible by its owned component. PII is not collected by the system, but the system may contain low impact.

**d. Why is the PII collected and/or what is the intended use of the PII?** (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

The PII that is contained is a byproduct of storing official records in the system. The PII is that which is contained in the official records.

**e. Do individuals have the opportunity to object to the collection of their PII?**  Yes  No

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

(2) If "No," state the reason why individuals cannot object to the collection of PII.

The PII contained (names, work phones, work emails, CAC IDs on digital signatures) is a result of normal business practices. Per NARA requirements, DOD is required to store, save recover and transition all government records into an electronic environment by December

**f. 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.

Same as (e).

**g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided.** (Check as appropriate and provide the actual wording.)

- Privacy Act Statement  Privacy Advisory  Not Applicable

ERM contains the following advisory upon launching: CUI-Privacy Advisory: This system contains personally identifiable information and is protected in accordance with the Privacy Act of 1974, as amended; and DoD 5400.11-R.

**h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?**

(Check all that apply)

Within the DoD Component

Specify.

Within WHS/ESD/Directives Division, and within WHS/AD.

<input type="checkbox"/>	Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	<input type="text"/>
<input type="checkbox"/>	Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	<input type="text"/>
<input type="checkbox"/>	State and Local Agencies	Specify.	<input type="text"/>
<input type="checkbox"/>	Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)	Specify.	<input type="text"/>
<input type="checkbox"/>	Other (e.g., commercial providers, colleges).	Specify.	<input type="text"/>

**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

<input checked="" type="checkbox"/>	Individuals	<input type="checkbox"/>	Databases
<input type="checkbox"/>	Existing DoD Information Systems	<input type="checkbox"/>	Commercial Systems
<input type="checkbox"/>	Other Federal Information Systems		

ERM does not share stored records or data with any other systems. There are no interconnectivities with other systems.

**j. How will the information be collected?** (Check all that apply and list all Official Form Numbers if applicable)

<input checked="" type="checkbox"/>	E-mail	<input checked="" type="checkbox"/>	Official Form (Enter Form Number(s) in the box below)
<input type="checkbox"/>	In-Person Contact	<input type="checkbox"/>	Paper
<input type="checkbox"/>	Fax	<input type="checkbox"/>	Telephone Interview
<input type="checkbox"/>	Information Sharing - System to System	<input type="checkbox"/>	Website/E-Form
<input checked="" type="checkbox"/>	Other (If Other, enter the information in the box below)		

Documents are either generated by ESD or AD personnel, sent to us via email or loaded to the DoD Issuances Portal System or SharePoint and manually input into ERM. In all cases, a person manually drags and drops records into the appropriate dataset of ERM. ERM does not connect to any other systems by way of integration. Records include completed DD Form 106 and emails, and contracting documents.

**k. 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 must be consistent.

Yes  No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/Privacy/SORNs/>  
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

ERM does not retrieve documents based upon PII or personnel unique identifier number. Documents stored in ERM are not content searchable.

**l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?**

(1) NARA Job Number or General Records Schedule Authority.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

The approved component file plan is built into ERM. ERM is set up to recognize the retention schedule of records placed within it, and records can be disposed of or prepared for transfer to NARA using ERM.

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.
- (2) If a SORN does not apply, 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) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.
  - (b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, 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 must be identified.

44 USC Chapter 29 "Records Management by the Archivist of the United States and by the Administrator of General Services," DoD 5105.02 "DoD Records Management Program," OMB M-19-21, "Memorandum for Heads of Executive Departments and Agencies-Transition to Electronic Records," DoDI 5025.01, "DoD Issuances Program"

**n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (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     No     Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, " DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

Per the Office of Information Management, OMB approval is not required because this system stores information that may have PII but does not collect PII and records are not retrievable by PII.