PRIVACY IMPACT ASSESSMENT (PIA)

DoD Information System/Electronic Collection Name:

Call Recording Application (CRA)

DoD Component Name:

Defense Finance and Accounting Service

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate personally identifiable information (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) 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 8925

☐ **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** **Enter UPI** 007-97-01-22-02-1954-00

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

☐ **No**

d. Does the DoD information system or electronic collection have 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** **Enter Privacy Act SORN Identifier** T5040

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.

☐ **No**

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 provision of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute and/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 USC Section 301, Departmental Regulations; E.O. 12862 (Customer Service); and E.O. 9397 (SSN).

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.

Overall, the Call Recording Application (CRA) records conversation (e.g., audio and video) that is part of the Caller - Customer Service Representative (CSR) interaction process in DFAS call centers located in Columbus, Cleveland and Indianapolis. [redacted] Via screen scraping software, it also captures a sampling of the computer screens used by CSRs to answer or document inquiries. Some of the systems accessed by the CRSs include IMATS, Remedy, DJMS, IGS, and MPDB. CRA does not interface with any system for PII data but incidentally collects data as a result of phone conversations between the caller and the DFAS CSR.

Calls are recorded in order to resolve possible misunderstandings or misperceptions made during the customer - CSR interaction. CRA also facilitates the process of monitoring and evaluating the recorded audio and computer screens used by CSRs in order to provide training, collect data in support of the CSRs' annual performance evaluations, and provide information used for business process improvements. The recorded audio and captured systems' screens and their indices may include the following information; name, rank, SSN, home address, telephone number, payroll information, marital status, dependent information, tax status, allotment, garnishment, debt, or other payroll or personal information provided by the customer for purposes of identification and verification and to resolve inquiries.

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

The result of mishandling personal data may lead to lost, stolen or compromised PII which could be harmful to the individual in many ways (e.g., identity theft, damage to the individual's reputation and /or financial hardship). Such incidents could cast DFAS in an unfavorable light to the public. Hence, access is limited to persons authorized to service or to use the system in performance of their official duties (requires screening and approval for need to know). DFAS adheres to physical protections of PII as described in accordance with DFAS 5200.1-R. IA policy (DFAS 8400.1-R) prescribes protection requirements for sensitive data, to include PII, for all DFAS systems. Management responsibilities for protecting data are maintained in DFAS 8500.1-R.

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. None apply. PII is not shared via data exchange.

☒ **Within the DoD Component.** Specify

Customer call center personnel and management on a need-to-know basis.

☐ **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

☐ **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 the method by which individuals can object to the collection of PII.

The CRA system does not permit individuals to object to data collection, however, the various DFAS Interactive Voice Response (IVR) applications (e.g., DFAS411, Pay Army, Purple Script, etc.) inform the caller that the conversation is being recorded for quality evaluation purposes. If the person objects while interfacing with the IVR application, then he/she has the option to terminate the call. If the call goes to a DFAS Customer Service Representative, then the customer can object at that time with the outcome being that the CSR cannot process the inquiry.

(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.

The various DFAS Interactive Voice Response (IVR) applications (e.g., DFAS411, Pay Army, Purple Script, etc.) inform the caller that the conversation is being recorded for quality evaluation purposes. See response for Section 2-i-1 above.

(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.

Not applicable as CRA is a recording system. The customer service representative uses PII provided by the customer to authenticate the caller and to process the inquiry request.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component can restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.