DEFENSE FINANCE AND ACCOUNTING SERVICE

Garnishment Electronic Document Management (EDM) System, Integrated Garnishment System (I-GARN)

Unique Project (Investment) Identifier – 007-97-01-01-02-8204-00

PRIVACY IMPACT ASSESSMENT (PIA)

Prepared by System Management Office/Cleveland, Ohio

May 2008

PRIVACY IMPACT ASSESSMENT

1. **Department of Defense Component.** Defense Finance and Accounting Service

2. **System Title.** Garnishment Electronic Document Management (EDM) System, Integrated Garnishment System (I-GARN).

3. **Budget System Identification Number.** 8204

4. **System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR)).** DITPR ID No. 102

5. **IT Investment (OMB Circular A-11) Unique Identifier (if applicable).** 007-97-01-01-02-8204-00

6. **Privacy Act System of Records Notice Identifier (if applicable**). T-5500b

7. **OMB Information Collection Requirement Number (if applicable) and Expiration Date. N/A**

8. **Type of authority to collect information (statutory or otherwise).**
5 U.S.C. 5520a, Garnishment of pay; 10 U.S.C. 1408, Payment of retired or retainer pay in compliance with court orders; 42 U.S.C. 659, Consent by United States to income withholding, garnishment, and similar proceedings for enforcement of child support and alimony obligations; 42 U.S.C. 665, Allotments from pay for child and spousal support owed by members of uniformed services on active duty; and E.O. 9397 (SSN).

9. **Provide a brief summary or overview of the IT system (activity/purpose, present life cycle phase, system owner, system boundaries, and interconnections, location of system and components, and system backup).**

   a. **Activity/Purpose.**
   I-GARN is a web-based application accessible to authorized DFAS employees through e-portal. I-GARN provides capabilities for electronic document management, records management, process automation, digital asset management, e-forms, e-mail management and collaboration, among others, and contains business rules to assist in processing garnishment actions and payments under the Uniformed Services Former Spouses' Protection Act. Documents enter I-GARN via a scanner, fax gateway, and interfaces with other Automated Information Systems (AIS). The imaged documents are identified and indexed to allow for future reference/processing. I-GARN workflow management automatically routes imaged documents to the paralegal specialists for legal review, processing, assignment of document type, case type, case number, and comments associated with the document are annotated at this time. The case is then updated to completed status and the

document is stored in I-GARN for future reference. As a workflow management system, I-GARN increases operational efficiency by extending access to documents, data, and business processes to a wide range of internal and external users (interfaces). Furthermore, it supports regulatory compliance by ensuring proper management of critical documents. The system's audit trail capabilities can track all transactions that occur over time.

b. **Present Life Cycle Phase.**
Operations and Support – Modernization/Enhancement.

c. **System Owner.**
Defense Finance and Accounting Service.

d. **System Boundaries and interconnections.**
I-GARN is a subsystem of the Integrated Garnishment System (IGS) that also includes an internet based subsystem called Kids-First, Payroll Locator File (PLFS), and connects to the myPay system that includes a subsystem called Smart Docs.

e. **System Location and Components.**
Defense Finance and Accounting Service-Cleveland

f. **System Backup.**
Currently under development. A server will be purchased and stored at DFAS-Indianapolis.

10. **Describe what information in identifiable form will be collected and the nature and source of the information (e.g., names, Social Security Numbers, gender, race, other component IT systems, IT systems from agencies outside DoD, etc.)**

a. **Information in Identifiable Form**
The information in I-GARN contains the names, Social Security Numbers (SSNs), and mailing addresses of individuals whose pay is being garnished and of the recipients of those payments. This information comes from individual state court wage withholding notices or court ordered garnishment orders, interrogatories, correspondence between DFAS Office of General Counsel and parties to the garnishment case. This may include DFAS payroll units, United States attorneys, United States District Courts, and other state and Federal government agencies relevant to the processing of child support and commercial debt garnishments, applications under the Uniformed Services Former Spouses' Protection Act, and applications for military involuntary allotments for commercial debt. The system also contains bankruptcy trustee's information, pursuant to Chapter 13 of the bankruptcy code.

b. **DFAS IT systems**
Integrated Garnishment System (IGS)

Defense Joint Military pay System (DJMS) Active and Reserve Component
Defense Retired and Annuitant System (DRAS)
Defense Civilian Pay Systems (DCPS)
Non-Appropriated Funds Civilian Pay System
Payroll Locator File (PLFS)
myPay

c. **DoD Component IT systems**
Marine Corp Total Force System (MCTFS)

d. **IT systems from agencies outside DoD:**
N/A

11. **Describe how the information will be collected (e.g. via the Web, via paper-based collection, etc.)**
Information is collected via court ordered paper-based documentation, via system interface with military and civilian pay entitlement systems, or via the IGS web based subsystem called Kids-First.

12. **Describe the requirement and why the information in identifiable form is to be collected (e.g., to discharge a statutory mandate, to execute a Component program, etc.)**
5 U.S.C. 5520a, Garnishment of pay; 10 U.S.C. 1408, Payment of retired or retainer pay in compliance with court orders; 42 U.S.C. 659, Consent by United States to income withholding, garnishment, and similar proceedings for enforcement of child support and alimony obligations; 42 U.S.C. 665, Allotments from pay for child and spousal support owed by members of uniformed services on active duty; and E.O. 9397 (SSN).

13. **Describe how the information in identifiable form will be used (e.g., to verify existing data, etc.)**
Records are being used and maintained for the purpose of processing court ordered garnishments of wages for military and civilian employees. In addition, trustee information is maintained for those receiving payments due to Chapter 13 bankruptcies. Records are retained from 60 days to 30 years depending on the type of record. Hard copy records are destroyed by tearing, shredding, pulping, macerating, or burning. Electronic data is destroyed by degaussing the electronic storage media.

14. **Describe whether the system derives or creates new data about individuals through aggregation.**
No, not applicable.

15. **Describe with whom the information in identifiable form will be shared, both within the Component and outside the Component (e.g., other DoD Components, Federal agencies, etc.)**
I-GARN has a direct interface with the Integrated Garnishment System (IGS) and is a subsystem used for the receipt of documents and outgoing

correspondence. I-GARN also has a direct interface with the Payroll Locator File System (PLFS). Access to I-GARN is primarily controlled through the use of multiple login and user accounts. All users must obtain a DFAS ELAN account before access will be granted to the e-portal, and subsequently I-GARN. Information may be shared with the military services, DoD Components and other government agencies whose civilian employees are paid by DFAS. In addition, information may be provided to former spouses who receive payments under 10 U.S.C. 1408 for the purpose of providing them information on how their payments were calculated. It may be provided to state child support agencies in response to their written requests for information regarding the p ay of military and civilian employees for the purpose of assisting the agencies in the discharge of their responsibilities under Federal and state law.

16. **Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form. Where consent is to be obtained, describe the process regarding how the individual is to grant consent.**

DFAS military and civilian entitlement systems collect the personal data that fed into and maintained in the I-GARN system or it is submitted by state or Federal court orders. A Privacy Act Statement is provided to individuals when the personal data is collected utilizing DoD or other government forms. Individuals are informed in the Privacy Act Statement the reason for the collection, authority for collecting it, routine uses of the data, and given the opportunity to object to the collection of their personal information, such as the SSN, as the Privacy Act Statements tells them that it is mandatory or voluntary to provide it.

17. **Describe any information that is provided to an individual, and the format of such information (Privacy Act Statement, Privacy Advisory) as well as the means of deliver (e.g., written, electronic, etc.), regarding the determination to collect the information in identifiable form.**

The DFAS military and civilian entitlement systems collect the data and the individuals are provided a Privacy Act Statements on the forms used to collect the personal data.

18. **Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form.**

Records are accessed by person(s) responsible for servicing the record system, and authorized to use it in performance of their official duties. These individuals are properly screened and cleared for need-to-know before being allowed access. Additionally, records are in an office building protected by guards and controlled by screening of personnel and registration of visitors.

19. **Identify whether the IT system or collection of information will require a System of Records (SOR) notice as defined by the Privacy Act of 1974, and as implemented by DoD Directive 5400.11-R, "DoD Privacy Program," November 11, 2004. If so, and a SOR notice has been published in the Federal Register, the Privacy Act System of Records Identifier must be listed in question 6 above. If not yet published, state when publication of the Notice will occur.**

The Privacy Act systems notice that covers this system has been published and it is T-5500b - Garnishment Processing Files (August 24, 2005, 70 FR 49589).

20. a. **Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form.**

Garnishing the incorrect member or employee is a potential privacy risk with regard to the collection, use and sharing of the information in identifiable form. However, there are internal controls in place to mitigate this risk. I-GARN interfaces with the PLFS to validate name and SSN, and during the legal review process. The IGS guides the paralegal through a validation process by requiring answers to a set of pre-determined questions before a garnishment is established.

b. **Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals.**

None

c. **Describe/evaluate further any risks posed by the adopted security measures.**

None

21. **State classification of information/system and whether the PIA should be published or not. If not, provide rationale. If a PIA is planned for publication, state whether it will be published in full or summary form.**

The system is unclassified and the data is classified as sensitive. The PIA may be published in full.

SIGNATURE PAGE – I-GARNS PIA

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