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:

Case Management System (CMS)

2. DOD COMPONENT NAME:	3. PIA APPROVAL DATE:
Defense Finance and Accounting Service	07/23/21

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: *(Check one. Note: foreign nationals are included in general public.)*

- [ ] From members of the general public
- [x] From Federal employees and/or Federal contractors
- [ ] From both members of the general public and Federal employees and/or Federal contractors
- [ ] Not Collected *(if checked proceed to Section 4)*

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

- [ ] New DoD Information System
- [ ] New Electronic Collection
- [x] 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.

CMS is a management tool system used for tracking, resolving, and reporting on military (active/reserve/retired) and vendor pay related cases or inquiries. Army and Defense Finance and Accounting Service (DFAS) Customer Care Centers (CCC) which are comprised of Military Pay (MilPay) and Commercial Pay (ComPay) use this information system. Army CMS users are located at various locations in the United States and outside the continental United States. DFAS CCCs are primarily located at Cleveland, OH; Indianapolis, IN; Columbus, OH; and Rome, NY.

CMS case management provides a single source of information for monitoring military pay problems in a timely and efficient manner, to include providing visibility to appropriate levels of management, permitting feedback to service members, and facilitating the identification of problem trends.

CCCs use CMS for tracking active/retired military and vendor customer inquiries through to their resolution. Occasionally, the inquiries will require research within the Department of Defense (DoD) Component and other DoD Components, as noted in section h. below, that use the Social Security Number (SSN) as unique identifiers.

The Army utilizes CMS as an all services, fully-integrated, single-source system for monitoring pay problems, uploading and tracking cases at all levels, providing immediate feedback to service members, monitoring timeliness, efficiency, and identification of problem trends.

The Personally Identifiable Information (PII) in this system consists of birth date, child information, citizenship, disability information, DoD Identification (ID) number, driver's license, education information, employment information, financial information, gender/gender identification, home/cell phone, legal status, mailing/home address, marital status, medical information, military records, mother's middle/ maiden name, name(s), official duty address, official duty telephone phone, other ID number, personal e-mail address, photo, place of birth, position/title, race/ethnicity, rank/grade, security information, SSN (full or in any form), work e-mail address, and spouse information.

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)*

Identification, verification, and data matching.

e. Do individuals have the opportunity to object to the collection of their PII?   [x] 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.

Overall the CMS does not collect PII directly from the individual. The Army receives PII concerning their work through an automated process. The CCC is the only user within CMS that requests PII from the callers to start a request. If a caller objects to giving their SSN then the Customer Service Representative (CSR) either logs the call under a miscellaneous tracking number or ends the call. In most cases, the CSR uses the SSN to accurately retrieve data from various other systems.

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.

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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

Upon request CMS can provide a Privacy Act Statement and/or Privacy Advisory to an individual asked to provide PII.

THIS SYSTEM CONTAINS PRIVACY ACT DATA
•AUTHORITY: EXECUTIVE ORDER 10450, 9397, AND PUBLIC LAW 99-474, THE COMPUTER FRAUD AND ABUSE ACT
•PURPOSE OF USE: TO RECORD NAMES AND SOCIAL SECURITY NUMBERS FOR THE PURPOSE OF VALIDATING THE TRUSTWORTHINESS OF INDIVIDUALS REQUESTING ACCESS TO DEPARTMENT OF DEFENSE (DOD) SYSTEMS AND INFORMATION.
•ROUTINE USES: THOSE GENERALLY PERMITTED UNDER THE 5 United States Code (U.S.C.) 522A(B) OF THE PRIVACY ACT AS REQUIRED.
•DISCLOSURE: DISCLOSURE OF THIS INFORMATION IS VOLUNTARY; HOWEVER, FAILURE TO PROVIDE THE REQUESTED INFORMATION MAY IMPEDE, DELAY OR PREVENT FURTHER PROCESSING OF THIS REQUEST.
•NOTE: RECORDS MAY BE MAINTAINED IN BOTH ELECTRONIC AND/OR PAPER FORM.

THIS SYSTEM CONTAINS INFORMATION SUBJECT TO THE PRIVACY ACT OF 1974 AS AMENDED
"FOR OFFICIAL USE ONLY"

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? *(Check all that apply)*

☒	Within the DoD Component	Specify.	CMS shares PII with internal DFAS organizations that demonstrate a "need to know," are authorized to work on case management in the CMS system, and have access to PII data contained within the CMS system, (e.g., Military Pay Operations).
☒	Other DoD Components	Specify.	CMS shares PII among various military departments (e.g., Army and Air Force personnel offices) that demonstrate a "need to know."
☐	Other Federal Agencies	Specify.	N/A
☐	State and Local Agencies	Specify.	N/A
☐	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.	N/A
☐	Other *(e.g., commercial providers, colleges).*	Specify.	N/A

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

- [X] Individuals
- [X] Existing DoD Information Systems
- [ ] Other Federal Information Systems
- [ ] Databases
- [ ] Commercial Systems

CMS receives PII electronically through interfaces with the following DFAS systems: Defense Joint Military Pay System-Active Component (DJMS-AC), Defense Joint Military Pay System-Reserve Component (DJMS-RC), Master-Pin, and Wounded in Action (WIA) System module of DJMS-AC.

The CCC source of PII data is directly from the individuals themselves – either through telephone conversations, emails, or faxes from the customer.

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

- [X] E-mail
- [ ] Face-to-Face Contact
- [X] Fax
- [X] Information Sharing - System to System
- [ ] Other *(If Other, enter the information in the box below)*
- [ ] Official Form *(Enter Form Number(s) in the box below)*
- [ ] Paper
- [X] Telephone Interview
- [X] Website/E-Form

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 <u>retrieved</u> by name or other unique identifier. PIA and Privacy Act SORN information must be consistent.

- [X] Yes
- [ ] No

If "Yes," enter SORN System Identifier   T7340b

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.defense.gov/Privacy/SORNs/
   o*r*

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.

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.   DFAS 5015.2-M Volume

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

(3) Retention Instructions.

CMS retention: Cutoff the year of the case closure and destroy 10 years after cutoff.

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 statue 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.

5 U.S.C. Chapter 55, Pay Administration; 37 U.S.C. Chapter 19, Pay and Allowance of the Uniformed Services; Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Vol 7A; and Executive Order (E.O.) 9397 SSN as amended.

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.

N/A CMS does not undertake collection of information directed to 10 or more individuals annually.