

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:

Electronic Document Management (EDM)

2. DOD COMPONENT NAME:

Defense Finance and Accounting Service

3. PIA APPROVAL DATE:

08/28/20

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

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

- | | |
|--|--|
| <input type="checkbox"/> From members of the general public | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

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

- | | |
|--|---|
| <input type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input checked="" type="checkbox"/> Existing DoD Information System | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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.

Electronic Document Management (EDM) is an electronic storage and workflow system, providing .MIL Contract Pay and Vendor Pay users access to electronic images utilized for the processing of payments and other transactions. EDM does not collect or index by Personally Identifiable Information (PII). PII contained within EDM is collected by the source systems. There are three basic operations to EDM: 1) Imaging [scanning of hard copy documents], 2) Electronic sorting [sorting documents into logical order for retrieval], and 3) Workflow [routes documents for processing depending on document type]. Documents are captured [e.g., fax, scan, or eUpload] then indexed by contract numbers and document type [e.g., invoices, receiving reports, etc.]. Travel documents and Department of Defense (DoD) form 577 Signature Cards represent types of documents imaged by EDM. Types of PII found may include individual's Social Security Number (SSN), mailing address, home phone, official duty address, official duty telephone, work email address, birth date, education information, position title, rank, Department of Defense Identification (DoDID) number, name, other ID number and bank information. While many EDM documents relate to vendors, a portion of the documents contain information for individuals (e.g., miscellaneous payments and for small 'mom and pop' vendors). Primary scanning locations for EDM include Defense Finance and Accounting Services (DFAS) Document Capture Centers located in Columbus (CO), Indianapolis (IN), Cleveland (CL), Limestone (LI), Rome (RO), Europe (EU), and Japan (JP). EDM's PuRE application highly reduces any Foldering to occur with "key word" filters in place. Finally, EDM users may access other systems i.e. : Electronic Document Access (EDA) which is a Defense Logistics Agency (DLA) owned system that is accessed via WAWF and houses contracts from numerous Contract writing systems for both Contractor Pay and Vendor Pay through automated interfacing; however, access is limited to approve users; or the Financial Accounting and Budget System (FABS), located at the Defense Electronic Computing Center (DECC) Ogden, Utah, which manages and tracks financial aspects on behalf of the Government through the Defense Working Capital Fund/Telecommunications Services/Enterprise Acquisition Services (DWCF/TS/EAS) and utilized by DFAS.

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)

Source systems collect PII for mission-related and Administrative use. EDM does not use the SSN locally for processing or maintaining personal information 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.

EDM does not collect PII or other information from individuals. EDM does not use the SSN locally for processing or maintaining personal information records. EDM is a storage system. PII contained within EDM is collected by the source systems. Individuals would need to contact the source system to object to PII.

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.

EDM does not collect PII or other information from individuals. EDM does not use the SSN locally for processing or maintaining personal information records. EDM is a storage system. PII contained within EDM is collected by the source systems. Individuals would need to contact the source system to object to PII.

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

EDM does not collect PII or other information from individuals. EDM does not use the SSN locally for processing or maintaining personal information records. EDM is a storage system. PII contained within EDM is collected by the source systems. Individuals would need to contact the source system to object to PII.

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.

EDM is accessed by the contracts and vendor pay communities within DFAS Operations (Accounts Payable, Accounts Receivable, and Transportation Operations).

Other DoD Components

Specify.

Army, Navy, Air Force, Marine Corps, Coast Guard, and Defense Agencies (e.g., Washington Headquarters Services).

Other Federal Agencies

Specify.

State and Local Agencies

Specify.

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.

Other (e.g., commercial providers, colleges).

Specify.

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

Individuals

Databases

Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

PII contained within EDM is collected by the source systems which are Corporate Electronic Document System (CEDMS), Voucher Attachment System/ Voucher Payment System (VAS/VPS) Part of CEDMS and Electronic Document Access (EDA), Entitlement Automation System (EAS), Financial Accounting and Budget System (FABS), Integrated Accounts Payable System (IAPS) Mechanization of Contract Administration Services (MOCAS), Standard Accounting and Reporting System (STARS), and Wide Area Workflow (WAWF).

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

E-mail

Official Form (Enter Form Number(s) in the box below)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

eUpload allows two different formats to be uploaded. Documents can be either Adobe's Portable Document Format (PDF) or Tagged Image File Format (TIFF). Access is restricted to prevent unauthorized use. EDM scans and contains many approved standard forms which contain PII such as DD form 577 Authorized Signature, Standard Form (SF) 1034 Public Vouchers for purchases and services, SF 1049 Public Voucher for Refunds, DD Form 1375 Request for Payment of Funeral Expenses, DD form 1556 Training Reimbursement.

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.dod.mil/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.

EDM does not contain information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name or other unique identifier.

I. 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.

Cut-off is at the end of each fiscal year. Destroy 10 years after Cut-off.

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.

31 United States Code (U.S.C.) Sections 3325, 3511, 3512, 3513; DoD Financial Management Regulation 7000.14R 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.

EDM does not directly collect data from the public.