

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:

Defense Retiree and Annuitant Pay System (DRAS)

2. DOD COMPONENT NAME:

Defense Finance and Accounting Service

3. PIA APPROVAL DATE:

04/16/21

Defense Finance and Accounting Service

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.

DRAS maintains pay and personnel information for use in the computation of military retired pay, survivor annuity pay, and to make payments to retirees, spouses, former spouses and other dependents. The DRAS system supports over 2.5 million customers and has several modules which include Retired and Casualty Pay System (RCPS), Annuitant Pay system (APS), Victim of Abuse (VOA), Voluntary Separation Incentive (VSI), Combat Related Special Compensation (CRSC), Concurrent Retirement and Disability Payments (CRDP), CRDP-CRSC Processing (CCP), Survivor Benefits Plan (SBP), Dependency and Indemnity Compensation (DIC), and Annuities for Certain Military Surviving Spouses (ACMSS).

Information collected for retirees and annuitants includes name, social security number, military records, address, etc. Personally Identifiable Information (PII) data is received through a wide range of collection methods with the largest being interfaces with partners at Veterans Administration (VA), Military Services, Internal Revenue Service (IRS), etc. PII data is also received from individuals during Retiree Seminars and during conversations with Defense Finance Accounting Service (DFAS) Call Center Customer Services Representatives. Customers can send PII data to DFAS via Internet capabilities such as direct emails and forms on the DFAS website. DRAS contains PII mostly related to the military service of recipients, their relationships to retired military service members, and personal information to facilitate payments. This includes names, addresses, rank titles, citizenship statuses, military record information such as time served and rank, place of birth, birth date, disability information such as VA ratings, Electronic Funds Transfer (EFT) numbers and routing numbers, law enforcement information such as if deaths were considered suspicious, marital statuses, child information, Department of Defense (DOD) Identification (ID) Numbers, gender information, legal statuses, medical information such as VA rating codes, social security numbers (SSN), and other supplemental information needed for entitlement calculations.

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)

To verify, identify, authenticate, and perform data matching of pay and personnel information for use in the establishment, computation and termination of military retired pay, survivor annuity pay, payments to spouses, former spouses, and other dependents who are victims of abuse as required by law.

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.

Privacy Act Statements appear on all forms used to collect the information from retirees, annuitants, and other eligible payees or authorized payee representatives. When collecting PII via telephone the caller is advised as part of the Interactive Voice Response System (IVRS) script that they are accessing a DoD application and that the call may be monitored. When receiving information via website electronic form submission, a privacy policy advisory is included.

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.

Individuals can review the Privacy Act Statement on forms and have the opportunity to decline to provide the information. Likewise, individuals may withhold consent for use by not providing information requested.

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

Privacy Act Statement

AUTHORITY: 10 United States Code (U.S.C.) 71, Computation of Retired Pay; 10 U.S.C. 73, Annuities Based On Retired or Retainer Pay; DoD Instruction 1332.42, Survivor Annuity Program Administration; and DoD Financial Management Regulation, 7000-14.R, Volume 7B, Chapter 42

PRINCIPAL PURPOSE(S): To collect information needed to establish a retired/retainer pay account, including designation of beneficiaries for unpaid retired pay, state tax withholding election, information on dependents, and to establish a Survivor Benefit Plan election.

ROUTINE USE(S): To Department of Veterans Affairs (DVA) regarding establishments of 10 U.S.C. 1450(f)(3), regarding Survivor Benefit Plan coverage. To spouses for purposes of providing information, consistent with the requirements of 10 U.S.C. 1448(a), regarding Survivor Benefit Plan coverage. Additional routine uses are available in the applicable system of records notice (SORN) T7347b, Defense Military Retiree and Annuity Pay System Records, available at: <http://dpcl.d.defense.gov/Privacy/SORNsindex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>

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.

PII will be shared with internal DFAS organizations that demonstrate a "need to know" (e.g. DFAS Office of General Counsel, DFAS Garnishment Operations, DFAS Disbursing Operations, or other DFAS offices to process pay entitlement related documents and to address customer inquiries).

Other DoD Components

Specify.

Data is shared with other DoD components such as active duty and reserve components for the military services (Army (e.g. mailing address for Army Echoes newsletter), Air Force, Navy and Marine Corps). Other DoD components include the Defense Manpower Data Center (DMDC).

Other Federal Agencies

Specify.

Records are provided to the Internal Revenue Service for normal wage and tax withholding. Disclosures are made to the Department of Veterans Affairs (DVA) regarding establishments, changes and discontinuing of DVA compensation to the retirees and annuitants; Office of Personnel Management as part of myPay processes; and Social Security Administration for matching purposes.

State and Local Agencies

Specify.

Data is provided to State Income Tax authorities.

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.

All contracts listed below include the specific narrative text from DFAS 52.224-9000 "INFORMATION ASSURANCE (July 2009)" paragraphs 'e' which provides language stating requirement for contractor to safeguard all PII data. -HQ042317P0016 Anthony Wayne Rehabilitation Center – In-bound Mail contractor receives Retiree and Annuitant (R&A) Operations incoming mail, faxes, emails and compact discs from wide range of customers and scans and indexes the documents into GODOCS.

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

Specify.

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, Records may be disclosed outside the DoD as a routine use as follows: to individuals authorized to receive retired and annuitant payments on behalf of retirees or annuitants; to former spouses for purposes of providing information regarding survivor Benefit Plan coverage; the Army and Air Force Mutual Aid Association (AAFMAA) and Navy-Marine Corps Relief Society (NMCRS) to process allotments for repayment of interest-free loans from the society; and to process retiree charitable allotments in support of fund drives initiated by Secretaries of the Army, Navy and Air Force.

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

Existing DoD information systems, other Federal information systems, individuals, courts, funeral homes, state vital statistics agencies.

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)

Defense Department (DD) 2866
DD 2656
DD 149
FMS 2231
Standard Form (SF) 1199A
Financial Management Service (FMS) Form 1201DFAS
Fiscal Service (FS) Form 1201W-DFAS
DD 2558
DD 2894
DD 2864
DD 2789
DD 2892
DFAS Cleveland (DFAS-CL) 1800/97
DFAS-CL 1800/100
IRS W7
IRS W4
IRS Form W-4
IRS W4P
IRS Withholding Certificate for Pension of Annuity Payments
DD 2868
IRS W-8BEN
DD 2788
DD 2790
FMS 2231
SF 1199A
DD 2828
DFAS 9415
DD 2656-7
SF 1174
DD 2790

DD 2860
DD 2293
DD 2656-10
Form 1059
DD 2891
DD 2656-5
DD 2656-10
DD 2656-8
DD 2656-1
DD 2656-2
DD 2656-6

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.

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.

Instructions for retention are described at length in the DFAS 5015-2-I/R, they vary based on the type of entitlement information being retained. General pay history for retirees and annuitants must be retained for 6.5 years after the death of the recipient and retired pay master data must be retained for 56 years after the recipients death.

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.

10 U.S.C. Chapters 53, 61, 63, 65, 67, 69, 71, 73, 74; 10 U.S.C. Sec. 1059 and 1408(h);
38 U.S.C. Sec 1311 and 1313; Pub. L.92-425; Pub Law 102-484 sec 653; Pub L. 103-160 sec. 544 and 1058;
Pub L. 105-261 sec 570; DOD Instruction 1342-24, Transmittal Compensation for Abused Dependents;
DoD Financial Management Regulation 7000.14-R, Volume 7B and 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.

0730-0001 Child Annuitant's School Certification (exp. 3/30/2020);
0730-0002 Statement of Claimant Requesting Re-certified Check (exp. 3/31/2017);
0730-0008 Application for Former Spouse Payments from Retired Pay (exp. 3/30/2020);
0730-0009 Waiver/Remission of Indebtedness Application (exp. 7/31/2021)
0730-0010 Customer Certification to Support Claim on Behalf of Minor Child (exp. 2/29/2020);
0730-0011 Physician Certificate for Child Annuitant (exp. 05/31/2020);
0730-0012 Trustee Report (exp. 03/31/2010);
0730-0013 Application for Trusteeship (exp. 03/31/2010);
Retired and Annuitant Pay Operations manages these Control Numbers/licenses and is actively working to renew those whose expiration date has passed.