

# 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:**

Standard Finance System (STANFINS)

**2. DOD COMPONENT NAME:**

Defense Finance and Accounting Service

**3. PIA APPROVAL DATE:**

05/04/21

**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  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
- 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.**

Standard Finance System (STANFINS) records financial transactions for the United States (U.S.) Army and other Department of Defense (DoD) agencies. Defense Civilian Pay System (DCPS) receives individual's Social Security Numbers (SSNs) on interface files and stores those files on report files accessible only by authorized individuals. STANFINS receives the first five (5) positions of an individual's last name from travel orders transmitted by the Defense Travel System (DTS). Privacy information includes employment information, financial information, names, SSNs, and Federal Tax Identification numbers (TINs).

**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)

Verification, identification, and mission-related use

**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.

STANFINS does not collect Personally Identifiable Information (PII) directly from individuals. DCPS indirectly sends the data to STANFINS through a data transmission via system interfaces with the Operational Data Store (ODS). DCPS would be responsible for any communications with the users affected.

**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.

STANFINS does not collect PII directly from individuals. DCPS indirectly sends the data to STANFINS through a data transmission via system interfaces with the ODS. DCPS would be responsible for any communications with the users affected.

**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

STANFINS does not solicit PII directly from individuals.

**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.

STANFINS shares PII with Defense Finance and Accounting Service (DFAS) organizations that demonstrate a need-to-know (e.g., DFAS accounting or finance operations) and have the required clearances to use that information.

Other DoD Components

Specify.

STANFINS shares PII with DoD organizations (e.g., Department of Army, Defense Commissary Agency) that demonstrate a need-to-know and have the required clearances to use that information.

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.

STANFINS shares information in the system with external auditors.

**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

The source of collected PII is DCPS and DTS.

**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)

**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

T7205b

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.

**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 and General Records Schedule (GRS) 1.1 Item 010

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

(3) Retention Instructions.

Cutoff at end of fiscal year. Destroy 10 years after the later of either closure of appropriate account or liquidation of all obligations in the closed account.

**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.

The following provides the authority for the information system: Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Volume 5; 31 United States Code (U.S.C.) 3511, Prescribing accounting requirements and developing accounting systems; 31 U.S.C. 3512, Executive agency accounting and other financial management reports and plans; 31 U.S.C. 3513, Finance reporting and accounting system; 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.

STANFINS does not solicit PII directly from individuals or from members of the general public. STANFINS receives all data via system interface, as such a Privacy Reduction Act (PRA) notification is not required. Per the Department of Defense Memorandum (DoDM) 8910.01, the DCPS system which collects this data should ensure clearance.