

# 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:**

DFAS Contract Debt System (DCDS)

**2. DOD COMPONENT NAME:**

Defense Finance and Accounting Service

**3. PIA APPROVAL DATE:**

06/15/20

## 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.**

Debts owed to the DoD by contractors are maintained in the Defense Finance and Accounting Service (DFAS) Contract Debt System (DCDS) through the Contractor offset program (COP) which allows input of debt detail, debt letter generation and email notification, accounts receivable recording of collections and generation of collection memos identifying which lines to Intra-Governmental Payments and Collections (IPAC) the funds, tracking by aging, status and interest, as well as monthly debt management reporting. DCDS contains information unique to contractors, and information unique to contractor hospital patients cared for in DoD hospitals, including social security numbers.

The type of PII in DCDS is: Employment Information, Home/Cell Phone, Mailing/Home Address, Race/Ethnicity, Work E-mail Address, Birth Date, Financial Information, Personnel E-mail Address, DoD ID Number, Name(s) and Social Security Number (SSN) (Full or in any form), employee identification number, and data universal numbering system number for contractors .

**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)

DCDS uses PII for identification for the billing process.

**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.

DCDS does not collect PII directly from any individual

**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.

DCDS does not collect PII information directly from any individual.

**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

DCDS does not collect PII information directly from any individual.

**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 on a need to know basis with internal DFAS accounting organizations

Other DoD Components

Specify.

Other Federal Agencies

Specify. PII will be shared on a need to know basis with the Department of Treasury for the Defense Treasury Offset Program (DTOP).

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

DCDS collects PII from existing DoD information systems that handle PII, such as the Wide Area Work Flow (WAWF). Users also key in data related to contractor debts, and import files related to medical billings.

**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)

DCDS collects PII from existing DoD information systems that handle PII, including WAWF. Users also key in data related to contractor debts, and import files related to medical billings. Users do not key in PII but may include attachments, ie; a copy of the SAM for each Vendor that contains phone numbers, email addresses, EIN and DUNS# for contractors.

**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 T7800

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpclid.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 TBD

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.

Records are retained according to DFAS records retention schedule; cut-off on date of final action destroy 10 years after cut-off; hard copy reports are sent to LAN printers and cover sheets are used to protect data. The general guidelines references are DFAS Records Management Procedures, 5015.2-1 and DFAS Records Disposition Schedule, 5015.2-M.

**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 U.S.C. 3512, Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R Vols. 6A and 6B, and E.O. 9397 (SSN) as amended. Federal agencies or non-Federal agencies as regulated by the Privacy Act of 1974 (5 U.S.C. 552a), as amended. DCDS supports the Centralized Offset Program (COP) which allows for the collection of debts from invoice being paid to the debtors.

**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.

Per DFAS Agency Information Management Control Officer (IMCO), Agency Program Management Office, Support Services, this system does not require an OMB approval number because it does not collect information directly from the public, and the feeder systems require approval which gives DCDS the ability to go forward without those approvals.