



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Defense Debt Management System and Debt and Claims Management/Oracle Policy Automation/Adobe LiveCycle (DDMS/D&CM/OPA)

Defense Finance and Accounting Service

### SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel\* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

**SECTION 2: PIA SUMMARY INFORMATION**

**a. Why is this PIA being created or updated? Choose one:**

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

**b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?**

- Yes, DITPR      Enter DITPR System Identification Number
- Yes, SIPRNET      Enter SIPRNET Identification Number
- No

**c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?**

- Yes       No
- If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

**d. 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 should be consistent.

- Yes       No
- If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.  
Consult the Component Privacy Office for additional information or  
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

**Date of submission for approval to Defense Privacy Office**   
Consult the Component Privacy Office for this date.

**e. Does this DoD information system or electronic collection have an 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**

**Enter OMB Control Number**

0730-0015 and 0730-0009

**Enter Expiration Date**

**No**

**f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.**

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

Authority for maintenance of the DDMS: 5 U.S.C. 301, Departmental Regulations, 5512, 5513, 5514, and 5584; 10 U.S.C. 1442, 1453, 2774, 2775, 9835; 31 U.S.C. 3325, 3342, 3526, 3701, 3702, 3711, 3716-3718; 32 U.S.C. 710, 716; 37 U.S.C. 1007(c); 40 U.S.C. 721, 723, 725, 726, 727, 728, 729; the Debt Collection Act of 1982 (Pub.L. 97-365, as amended by Pub.L. 104-134, the Debt Collection Improvement Act of 1996); Pub.L. 89-508; E.O. 9397 (SSN) as amended; and DoD 7000.14-R, Department of Defense Financial Management Regulation, Volume 5, Part Two.

**g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.**

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The purpose is to collect debt from out of service military members who owe money to the Defense Department. The personal information is names, addresses and social security numbers.

- To administratively manage the collection of debts owed to the Department of Defense (DoD). These debts include, but are not limited to, past due loan payments, overpayments, fines, interest, penalties, administrative fees, and amounts derived from damages, leases, and sales of real or personal property.
- To implement the salary offset provisions of 5 U.S.C. 5514, the administrative offset provisions of 31 U.S.C. 3711 and 3716-3718, and the provisions of the Federal Claims Collection Standards (31 CFR parts 900-904), that apply to personal debts.
- To permit collection of delinquent claims and debts owed to the U.S. Government under any program or service administered by any creditor DoD Component.
- To determine the validity of waivers or to make referrals to the Defense Office of Hearings and Appeals (DOHA).
- To maintain records of investigations conducted for the purpose of confirming, canceling, or determining if the debts are accurate or valid, and whether the debt should be remitted or waived.

All records in this system are subject to use in authorized computer matching programs within DoD and with other Federal agencies or non-Federal agencies as regulated by the Privacy Act of 1974 (5 U.S.C. 552a), as amended.

Information collected varies depending on the debtor and the related history of debt billing and follow-up collection activity. These records may include name, Social Security/Account Number, mailing address, original debt principal and the delinquent amount, basis of the debt, date debt arose, late payment charges, office referring the debt, collection efforts, credit reports, collection letters, due process notice, and records of e-mail, telephone, or written correspondence to or from the debtor relating to the debt to include:

- Correspondence with other Federal agencies to initiate the collection of debts through voluntary or involuntary offset procedures against the indebted employees' salaries or compensation due a retiree.
- Correspondence with other Federal agencies requesting administrative offset from payments owed to the debtor.
- Information on U.S. Treasury Department, Internal Revenue Service (IRS), U.S. Department of Justice, and U.S. General Accounting Office (GAO) inquiries, judicial proceedings regarding bankruptcy, pay account histories, and token payment information.
- Applications for waiver of erroneous payment or for remission of indebtedness with supporting documents.
- Reports from probate courts regarding the estates of deceased debtors.
- Reports from bankruptcy courts regarding claims of the U.S. Government against debtors.

Specific types of PII stored in the system are identified in Section 3, paragraph a.(1) below.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) responsible for servicing the record in performance of their official duties and who are properly screened and cleared for need-to-know. Access to computerized data is restricted by passwords, firewalls, encryption, virtual private networks, and common access card.

All systems and environments have threats that seek to exploit and cause harm to the information. Some threats are natural, some are inherent in the system design, some can be attributed to unauthorized personnel, and some from authorized personnel who make mistakes. Four general categories of threats exist: human-intentional, human-unintentional, structural, and natural. The prime concern within every category is the likelihood that the threat will occur and its impact on the confidentiality, integrity, or availability of the system or information. Threats change over time and should be periodically reassessed.

DFAS adheres to physical protections of PII as described in accordance with DFAS 5200.1-R. IA policy (DFAS 8400.1-R) prescribes protection requirements for sensitive data, to include PII, for all DFAS systems. Management

responsibilities for protecting data are maintained in DFAS 8500.1.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)?** Indicate all that apply.

**Within the DoD Component.**

Specify. PII will be shared with internal DFAS organizations that demonstrate a 'need to know'. PII is shared with other DoD components (Army, Navy, Air Force and Marines).

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify. The U.S. General Accounting Office, the U.S. Department of the Justice, Internal Revenue Service, U.S. Department of Treasury, or other Federal agencies when circumstances warrant further collection action on delinquent accounts. The DoD Blanket Routine Uses as published at the beginning of the DFAS Privacy Act System of Records Notices apply to this system.

**State and Local Agencies.**

Specify. State and local taxing agencies for the use identified in the DoD Blanket Routine Uses published at the beginning of the DFAS Privacy Act system of records notices.

**Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

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

Specify. Commercial Credit Reporting Agencies and Treasury Department's Private Collection Agencies

**i. Do individuals have the opportunity to object to the collection of their PII?**

**Yes**

**No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

We collect PII with the DD Form 2789, Waiver/Remission of Indebtedness Application, DD Form 1351-2, Travel Voucher or Sub Voucher, and DD Form 2840, Request for Information Regarding Deceased Debtor, that is entered into the system. The individual can refuse to fill out the form if they object to the collection of PII.

(2) If "No," state the reason why individuals cannot object.

**j. 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.

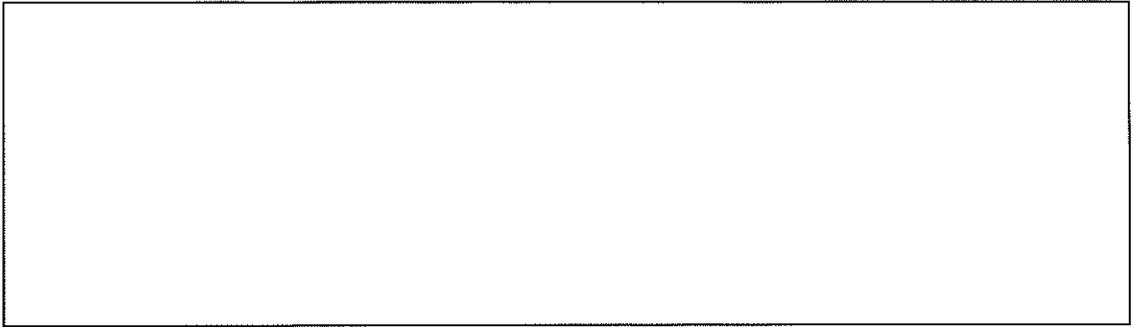
We collect "original" PII with the DD Form 2789, Waiver/Remission of Indebtedness Application, DD Form 1351-2, Travel Voucher or Sub Voucher, and DD Form 2840, Request for Information Regarding Deceased Debtor, that is entered into the system. Individuals can give or withhold their consent by submitting or not submitting the form.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

**k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.**

**Privacy Act Statement**                       **Privacy Advisory**  
 **Other**     **None**

Describe each applicable format.



**NOTE:**

**Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.**

**A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.**