

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 Case Tracking (ECT)

2. DOD COMPONENT NAME:

United States Air Force

3. PIA APPROVAL DATE:

04/20/21

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- From members of the general public From Federal employees
 from both members of the general public and Federal employees 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.

ECT application provides the SG staff, ARC leaders and its subordinate organizations with an improved tool to administer and manage ECT determination thereby ensuring the required medical care and timely dispositions are provided for deserving service members. It provides a Web accessible comprehensive, user-friendly tool to initiate and complete documents required for ECT investigations. The ECT module will also provide ARC a means to collect and manage the data and documents relating to injuries, illnesses, diseases, and it generates the required investigation reports and appropriate disposition documents. The ECT web application was designed to help the user process the service member's ECT investigation promptly and to help manage the ECT process by reporting significant information obtained from various sources and reported on various forms. ECT provides the capability to capture, in electronic format, information provided by the user in completing the AF Form 348, DD Form 261 and required case documentation.

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)

PII collected is used for identification, verification, authentication for account access and completion of documents for care determination and eligibility for benefits and entitlements.

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.

PII is received from MilPDS, authoritative data system, which is the source for personnel data and USAF Systems of Record. Members are not asked or required to input their personnel data into the system. Therefore, opportunity to object to their PII collection is accomplished at the MilPDS level.

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.

PII is received from MilPDS, authoritative data system, which is the source for personnel data and USAF Systems of Record. Members are not asked or required to input their personnel data into the system. Therefore, opportunity to consent to the specific uses of their PII is accomplished at the MilPDS level.

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

ECT does not directly collect PII. Privacy Act Statement/Advisory provided at authoritative source of collection.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?
(Check all that apply)

- | | | |
|--|----------|----------------------------|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. | Air Force Personnel Center |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | |
| <input type="checkbox"/> State and Local Agencies | Specify. | |
| <input type="checkbox"/> 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. | |
| <input type="checkbox"/> 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)

- | | |
|--|---|
| <input type="checkbox"/> Individuals | <input type="checkbox"/> Databases |
| <input checked="" type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

Military Personnel Database System (MILPDS) and ARCNET.

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

- | | |
|---|---|
| <input type="checkbox"/> E-mail | <input checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

AF Form 348 and DD Form 261 are completed within the automated application.

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 F036 AF PC C

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcltd.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. N1-AFU-90-03

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

(3) Retention Instructions.

T 41 - 02 R 03.00 - Medical Board Proceedings -- Destroy after 1 year.

T 36 - 16 R 07.00 - Line of Duty (LOD) Determination File Duplicate Copies -- Destroy 1 year after reconciliation with MPF career enhancement.

Note: Among the disposition cited in this field, the one with the longest retention time will be used on the system's record data.

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. 10204, Personal Records; 10 U.S. Code 9013, Secretary of the Air Force; and Executive Order 9397 (SSN); Air Force Instruction 48-133, Duty Limiting Conditions, Air Force Instruction 36-2910, Line of Duty (LOD) Determination, Medical Continuation (MEDCON), and Incapacitation (INCAP) Pay; DAFMAN 48-123, Medical Examinations and Standards.

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.

ECT does not have an OMB Control Number, as it does not collect information from members of the public and it is exempt from the Paper Reduction Act.

SECTION 2: PII RISK REVIEW

a. What PII will be collected (a data element alone or in combination that can uniquely identify an individual)? (Check all that apply)

- | | | |
|---|---|--|
| <input type="checkbox"/> Biometrics | <input checked="" type="checkbox"/> Birth Date | <input type="checkbox"/> Child Information |
| <input type="checkbox"/> Citizenship | <input type="checkbox"/> Disability Information | <input checked="" type="checkbox"/> DoD ID Number |
| <input type="checkbox"/> Driver's License | <input type="checkbox"/> Education Information | <input type="checkbox"/> Emergency Contact |
| <input type="checkbox"/> Employment Information | <input type="checkbox"/> Financial Information | <input checked="" type="checkbox"/> Gender/Gender Identification |
| <input checked="" type="checkbox"/> Home/Cell Phone | <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Legal Status |
| <input checked="" type="checkbox"/> Mailing/Home Address | <input type="checkbox"/> Marital Status | <input checked="" type="checkbox"/> Medical Information |
| <input type="checkbox"/> Military Records | <input type="checkbox"/> Mother's Middle/Maiden Name | <input checked="" type="checkbox"/> Name(s) |
| <input checked="" type="checkbox"/> Official Duty Address | <input checked="" type="checkbox"/> Official Duty Telephone Phone | <input type="checkbox"/> Other ID Number |
| <input type="checkbox"/> Passport Information | <input type="checkbox"/> Personal E-mail Address | <input type="checkbox"/> Photo |
| <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Position/Title | <input checked="" type="checkbox"/> Protected Health Information (PHI) ¹ |
| <input type="checkbox"/> Race/Ethnicity | <input checked="" type="checkbox"/> Rank/Grade | <input type="checkbox"/> Religious Preference |
| <input type="checkbox"/> Records | <input type="checkbox"/> Security Information | <input checked="" type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input checked="" type="checkbox"/> Work E-mail Address | <input type="checkbox"/> If Other, enter the information in the box below | |

If the SSN is collected, complete the following questions.

(DoD Instruction 1000.30 states that all DoD personnel shall reduce or eliminate the use of SSNs wherever possible. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria.)

(1) Is there a current DPCLTD approved SSN Justification on Memo in place?

- Yes No

If "Yes," provide the signatory and date approval. If "No," explain why there is no SSN Justification Memo.

SSN Justification Memo submitted to DoD on 9 MAR 21.

(2) Describe the approved acceptable use in accordance with DoD Instruction 1000.30 "Reduction of Social Security Number (SSN) Use within DoD".

Interoperability and operational necessity between DoD agencies;
 The justification for the use of the SSN in accordance with DoDI 1000.30, enclosure is paragraph 2.c(8), Computer Matching. The AF Form 348 is used by both the Air Force and Veterans Affairs Administration to ensure injuries and illnesses are appropriately compensated or not compensated by the VA. Forms are printed and provided manually to these agencies. The line of duty finding on the form is critical for this.

(3) Describe the mitigation efforts to reduce the use including visibility and printing of SSN in accordance with DoD Instructoin 1000.30, "Reduction of Social Security Number (SSN) Use within DoD".

Personally Identifiable Information (PII) contained in ECT is appropriately secured and limited to facilitate interoperability or meet regulatory requirements. ECT has met the minimum requirement for the protection of all PII data, which includes Social Security Numbers (SSNs) by achieving the approval of Certification and Accreditation controls per DoD system accreditation standards. The system is configured to protected data at rest by encryption, limit access by role, and auditing is maintained on all transactions.

(4) Has a plan to eliminate the use of the SSN or mitigate its use and or visibility been identified in the approved SSN Justification request?

If "Yes," provide the unique identifier and when can it be eliminated?
 If "No," explain.

- Yes No

Migration to the use of EDIPI, once all agencies have converted to accepting it in lieu of SSN as primary identification.

b. What is the PII confidentiality impact level²? Low Moderate High

¹The definition of PHI involves evaluating conditions listed in the HIPAA. Consult with General Counsel to make this determination.
²Guidance on determining the PII confidentiality impact level, see Section 2.5 "Categorization of PII Using NIST SP 800-122." Use the identified PII confidentiality impact level to apply the appropriate Privacy Overlay low, moderate, or high. This activity may be conducted as part of the categorization exercise that occurs under the Risk Management Framework (RMF). Note that categorization under the RMF is typically conducted using the information types described in NIST Special Publication (SP) 800-60, which are not as granular as the PII data elements listed in the PIA table. Determining the PII confidentiality impact level is

NOTE: Sections 1 above is 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 if they contain information that would reveal sensitive information or raise security concerns.