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:

KT FileShare (KTFS) API

2. DOD COMPONENT NAME:

United States Air Force

3. PIA APPROVAL DATE:

10/16/24

SAF/AQC

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
- [x] 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.)*

- [x] 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.

KT FileShare is an electronic contract file management tool used throughout the Air Force. It is a collaborative tool utilizing the Air Force acquired Microsoft 365 applications and is utilized by acquisition personnel to create legally sufficient documents required for AF acquisitions. It serves as both the working file and the Official Contract file as determined by the AF Records Manager. KTFS benefits the mission by allowing access to contract files from any CAC enabled computer in order to support telework. It also allows for standardization, tracking of taskings, and is a goldmine of Business Intelligence by allowing for searches and exploiting the meta data it collects. Cost savings are also attributable to KTFS in the areas of paper reduction, reduced travel, reduced office storage space, and training. KTFS has been deployed across the Air Force and benefits all personnel that participate in the acquisition process. The tool is used to conduct inspection of the contract files, legal reviews, Small Business coordination as well as many other tasks required in acquisitions. KTFS is currently managed out of HQ AFICC.

Describe the MAJOR hardware/software components of the system:
The User Interface (UI)/Presentation layer is hosted within Cloud Hosted Enterprise Services (CHES) SPO. The micro-services and Application Program Interface's (API) will be hosted within Cloud One/Azure.

KTFS API is collecting the first name, last name, EDIPI, and email address for user verification, identification, authentication, and data matching.

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)*

KTFS API is collecting the first name, last name, EDIPI, and email address for user verification, identification, authentication, and data matching. User authentication will be performed by the existing Cloud One GCDS process which in turn will send the predefined user fields to KTFS API. Using identifiers such as EDIPI, KTFS API will execute authorization policies and retrieve only those records which the user has been granted access to. The authorization policies will be using the users email address in conjunction with access control lists to perform data mapping and permissions evaluation.

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.

Since the data collection is performed by Cloud One GCDS/CAC and is required to sign into the environment, the user cannot object to the information required for this process flow. The only way the user can object is by canceling the authentication process and not gaining access to the environment.

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.

Since the data collection is performed by Cloud One GCDS/CAC and is required to sign into the environment, the user cannot object to the information required for this process flow. The only way the user can object to consent is by canceling the authentication process and not gaining access to the environment.

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

The user is not asked to provide the PII during authentication with Cloud One GCDS as they have already consented when obtaining their CAC.

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)*

☒ Within the DoD Component	Specify.	Air Force credentialed KTFS personnel and management on a need to access basis.
☐ Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	
☐ Other Federal Agencies *(i.e. Veteran's Affairs, Energy, State)*	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.	

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

When a user is granted access to the Cloud One, their information is collected and stored by the hosting platform from the central Air Force Active Directory. Cloud One GCDS will use their central user store and information presented during authentication via CAC to provide KTFS API the user fields (first/middle/last, email, and EDIPI).

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)*

☐ In-Person Contact ☐ Paper

☐ Fax ☐ Telephone Interview

☒ Information Sharing - System to System ☐ Website/E-Form

☐ Other *(If Other, enter the information in the box below)*

The Cloud One GCDS authentication process will send the user information as HTTP request headers to the KTFS API.

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 DoD-0015

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

I. 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. DAA-GRS-2013-0003-0001; N1-AFU-90-03; N1-AFU-89-31; N1-AFU-91-41; DAA-GRS-2018-0003-0002

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

(3) Retention Instructions.

T 64 - 01 R 01.00 - Contract Case Files at or Below Simplified Acquisition Threshold - Destroy 10 years after final payment.
T 64 - 01 R 02.00 - Contract Case Files Exceeding Simplified Acquisition Threshold - Destroy 10 years after final payment.
T 64 - 01 R 03.00 - Utility Contracts - Destroy 15 years after close of contract/final clearance/settlement.
T 64 - 01 R 04.00 - Utility Contracts - Delivery Orders Over $10,000 - Destroy 10 years after payment/final clearance/settlement.
T 64 - 01 R 05.00 - Utility Contracts - Delivery Orders for $10,000 or Less - Destroy 10 years after payment/final clearance/settlement.
T 64 - 01 R 06.00 - Unsuccessful Offers - Below Purchase Limit - Destroy 1 year after date of award or until final payment whichever, is later.
T 64 - 01 R 07.00 - Contract Status, Expediting and Production Surveillance - Destroy 10 years after final payment.
T 64 - 01 R 08.00 - Contract Case Files - Signed - Destroy 10 years after final payment.
T 64 - 01 R 11.00 - General Contract Case Files - Other Below Purchase Limit - Destroy 10 years after final payment.
T 64 - 01 R 12.00 - General Contract Case Files - Other Above Purchase Limit - Destroy 10 years after final payment.
T 64 - 01 R 15.00 - Solicited and Unsolicited Unsuccessful Bids - Destroy when related contract is completed.
T 64 - 01 R 16.00 - Transactions That Do Not Obligate Funds - Destroy 10 years after expiration or termination.
T 64 - 01 R 17.00 - Cancelled Procurement Actions - Destroy 5 years after date of cancellation.
T 64 - 01 R 18.00 - Subcontracts Written Under a Fixed-Price Prime Contract - Destroy 10 years after completion of the subcontract.
T 64 - 01 R 20.00 - Engineering Change Proposals - Destroy after 2 years.
T 64 - 01 R 21.00 - Engineering Change Proposals - Rejected - Destroy 6 months after final payment under the contract.
T 64 - 01 R 22.00 - Source Selection Proceedings - Destroy with related contract.
T 64 - 01 R 23.00 - Source Selection - Successful Proposals - Destroy 10 years after final payment of any contract resulting therefrom.
T 64 - 01 R 24.00 - Source Selection - Unsuccessful Proposals - Destroy with related contracts.
T 64 - 01 R 25.00 - Source Selection Proceedings - Notes/Working Papers - Destroy after 1 year.
T 64 - 01 R 27.00 - Individual Vendors - Destroy when individual document is superseded by a new record, when vendor is removed from list of suppliers or on inactivation of the contracting activity, whichever is sooner.
T 64 - 01 R 28.00 - Numbered Contracting Letters - Destroy when superseded, obsolete and/or incorporated in the Federal Acquisition Regulation (FAR) or in a supplement to the FAR.
T 64 - 01 R 29.00 - Pricing Reviews - Destroy after 10 years from the date of final payment under the contract or after 10 years if conditions do not permit cross referencing of the pricing review file to the official contract file.
T 64 - 02 R 01.00 - PRs/MIPRs - Single-Contract (Procuring Activity Copy) - Destroy with related contract 10 years after final payment.
T 64 - 02 R 02.00 - PRs/MIPRs - Multi-Contract (Procuring Activity Copy) - Destroy 10 years after final payment with contract having longest retention period.
T 64 - 02 R 07.00 - Other Agency MIPRs and Project Orders - Satisfied By Procurement or Combination - Destroy 10 years after receipt of applicable contract completion statement.
T 64 - 03 R 01.00 - Invitations for Bids - Other ACO - Destroy after bid opening date as shown on the IFB.
T 64 - 03 R 02.00 - Invitations for Bids - No Award After Opened - Destroy 1 year after date of bid opening, unless bidder asks return of his bid.
T 64 - 03 R 03.00 - Unsuccessful Bidders Protests - Destroy 3 years after final decision is submitted to protester.
T 64 - 03 R 04.00 - Unsuccessful Bids/Proposals - Below Purchase Limit - Destroy after final payment under the contract or 1 year from date of award whichever is later.
T 64 - 03 R 05.00 - Unsuccessful Bids/Proposals - Over Purchase Limit - Destroy 6 years, 3 months after final payment of each contract.
T 64 - 03 R 06.00 - Unsuccessful Bids/Proposals - Protest/Complaint - Destroy after final resolution of case.
T 64 - 03 R 11.00 - Unsolicited Proposals - Rejected - Destroy 1 year after notifying contractor of evaluation results.
T 64 - 04 R 01.00 - Construction Contract Progress Reports - Destroy 10 years after final payment under the contract.
T 64 - 04 R 02.00 - Construction Contractor Payroll - Destroy 3 years after final payment under the contract,after settlement of claims, or

completion of investigations, whichever is later.
T 64 - 04 R 03.00 - Construction Contract Performance/Bond Checklists - Destroy 1 year after final payment under the contract.
T 64 - 05 R 01.00 - Basic Agreements - at Issuing PO - Destroy 10 years after date of termination or cancellation.
T 64 - 05 R 02.00 - Basic Agreements - For Contracts (at Other POs/CAOs) - Destroy 10 years after agreement has been terminated, superseded or cancelled and all contracts referencing the terms and conditions of the agreement have been closed out.
T 64 - 05 R 03.00 - Basic Agreements - No Contracts or Information Copies - Destroy after 10 years.
T 64 - 06 R 01.00 - Master Bailment Agreements - at Preparing/Executing Office - Destroy 10 years after agreement has been superseded or cancelled and all contracts referencing the terms and conditions of the agreement have been completed or terminated.
T 64 - 06 R 03.00 - Bailment Agreements - at Procurement Activity - Destroy 10 years after all property has been properly disposed of and said agreement has been cancelled.
T 64 - 07 R 01.00 - Performance Data Renegotiation - Destroy after 10 years.
T 64 - 07 R 02.00 - Renegotiation Status Reporting - Destroy after 10 years.

Note 1: Among the dispositions cited in this field, the one with the longest retention time will be used on the system's records data.
Note 2: If any disposition cited in this field has a pending or unscheduled disposition, treat records as permanent retention until an approved NARA disposition is published."
Note 3: If any disposition cited in this field have a permanent retention, retain the records, and prepare for transfer to NARA as scheduled.

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 statue 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.

5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 18 U.S.C. 1029, Access device fraud; E.O. 10450, Security Requirements for Government Employees, 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.

The KTFS API is only using information off the CAC in order to validate users.

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.