

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:

Regional Civilian Personnel System - AF (RCPS-AF); Business Objects (BO)

2. DOD COMPONENT NAME:

United States Air Force

3. PIA APPROVAL DATE:

08/06/21

Manpower, Personnel and Services (AF/A1)

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.

Business Objects (BO) is a commercial-off-the-shelf (COTS) product reporting tool that provides corporate and ad-hoc reporting capabilities to authorized users in need of Civilian HR data through direct pull and documented interfaces. BO is used in conjunction with the AF DCPDS region and the AF Current Record Mart data. Business Objects is under the umbrella of RCPS-AF as a System of Record Notice.

Types of Personal information collected includes: Citizenship, Employment information, Home/cell phone, Mailing/home address, Race/ethnicity, Work e-mail address, Birth date, Disability information, Education information, Marital status, Official duty telephone, Personal e-mail address, Position/title, Rank/grade, Security information, DoD ID number, Emergency contact, Gender/gender identification, Name(s), Other ID number, SSN, Other names used, and spouse information.

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)

Mission-related: Reporting capabilities used throughout the AF Civilian HR communities.
Administrative use: To satisfy reporting needs for AF Civilian data.

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.

Business Objects does not capture the data directly, it pulls existing data from a group of systems used through interfaces documented and authorized by AFSPC.

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.

Business Objects (BO) is not the original system of record it is under the umbrella of RCPS-AF. It is a reporting tool used to pull data from existing authorized systems.

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

Data is not directly collected from individuals. Data is pulled from existing authorized systems. Privacy Act Statement/Advisory provided point of collection.

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.
- Other DoD Components Specify.
- 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.

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

Defense Civilian Personnel Data System (DCPDS)

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

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

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

(3) Retention Instructions.

TR 33 - 42 R 04.00, Transitory Material -- Destroy 3 months after monthly cutoff or when no longer needed, whichever is sooner.

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.

5 U.S.C. Government Organization and Employees: §1302 Regulations; §2951 Reports of OPM; §3301 Civil Service Gen; §3372 General Provisions; §4118 Regulations; §8347 Administration, regulations; AFI 36-129, Civilian Personnel Management and Administration; and Executive Order 9397, as amended by Citations 13478, 9830, and 12107.

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.

BO does not collect data from the general public.

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 checked="" type="checkbox"/> Citizenship | <input checked="" type="checkbox"/> Disability Information | <input checked="" type="checkbox"/> DoD ID Number |
| <input type="checkbox"/> Driver's License | <input checked="" type="checkbox"/> Education Information | <input checked="" type="checkbox"/> Emergency Contact |
| <input checked="" 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 checked="" type="checkbox"/> Marital Status | <input type="checkbox"/> Medical Information |
| <input type="checkbox"/> Military Records | <input type="checkbox"/> Mother's Middle/Maiden Name | <input checked="" type="checkbox"/> Name(s) |
| <input type="checkbox"/> Official Duty Address | <input checked="" type="checkbox"/> Official Duty Telephone Phone | <input checked="" type="checkbox"/> Other ID Number |
| <input type="checkbox"/> Passport Information | <input checked="" type="checkbox"/> Personal E-mail Address | <input type="checkbox"/> Photo |
| <input type="checkbox"/> Place of Birth | <input checked="" type="checkbox"/> Position/Title | <input type="checkbox"/> Protected Health Information (PHI) ¹ |
| <input checked="" type="checkbox"/> Race/Ethnicity | <input checked="" type="checkbox"/> Rank/Grade | <input type="checkbox"/> Religious Preference |
| <input type="checkbox"/> Records | <input checked="" 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 checked="" type="checkbox"/> If Other, enter the information in the box below | |

Other Names Used, Spouse Information

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 (dated within two (2) years) 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.

Re-submitted to DoD Privacy on 03 AUG 21.

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

The acceptable use IAW DODI 100.30 is (8) computer matching. BO includes data from the Defense Civilian Personnel Data System (DCPDS) which still uses SSN as the primary source of identification. BO authorized users access the application that requires a user name & password. The OPM/GOVT-1 SORN, that covers RCPS-AF, states SSNs are used to ensure customer records are accurately distinguished from one another (ref: para hh).

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

SSN is not completely visible in all applications - masked where possible.

(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

When OSD eliminates the requirement for SSN, BO will transition to use a DOD ID for the purposes of uniquely identifying customer records and providing data to users and dependent systems.

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

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.