



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

EXHRM-EXCHANGE HUMAN RESOURCES MANAGEMENT - APMS Portfolio

Army and Air Force Exchange Service (Exchange)

### **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**

**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.

10 U.S.C. 3013 and 8013; and Army Regulation 360-5, Public Information; Army Regulation 215-3, Nonappropriated Funds Personnel Policies and Procedures; and Army Regulation 215-8/AFI 34-211(I), Army and Air Force Service Operations; E.O. 9397 (SSN); 42 U.S.C. 659, Consent by United States to income withholding, garnishment, and similar proceeding for enforcement of child support and alimony obligations; 31 CFR 285.11, Administrative Wage Garnishment; DoD Directive 7000.14-R, DoD Financial Management Regulation; Army Regulation 215-3; Nonappropriated Funds Personnel Policies and Procedures; and Army Regulation 690-700, Personnel Relations and Services; Army Regulation 215-1, The Administration of Morale, Welfare, and Recreation Activities and Non-appropriated Fund Instrumentalities; E.O. 12196, Occupational Safety and Health Programs for Federal Employees.

**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.

Purpose: To prepare feature articles for hometown newspapers, trade media, community interests, and similar public service groups; The Official Personnel Folder and other general personnel records are the official repository of the records, reports of personnel actions, and the documents and papers required in connection with these actions effected during an employee's service with the Army and Air Force Exchange Service.

Records provide the basic source of factual data about a person's employment with the agency and have various uses by the Exchange personnel offices, including screening qualifications of employees, determining status, eligibility, and employee's rights and benefits, computing length of service, and other information needed to provide personnel services; To provide basis for computing civilian pay entitlements; to record history of pay transactions, leave accrued and taken, bonds due and issued, taxes paid; to process payment in compliance with court orders (i.e. Qualifying Domestic Relations Order), and to answer inquiries and process claims; records are used in considering individuals who have applied for positions in the Army and Air Force Exchange Service by making determinations of qualifications including medical qualifications, for positions applied for, and to rate and rank applicants applying for the same or similar positions; To determine propriety and legal sufficiency of the agency's action in the appeal or grievance matter; To provide health care and medical treatment to employees who become ill or are injured during working hours; To produce reports and statistical analyses of the civilian work force strength trends and composition in support of established manpower and budgetary programs and procedures; verify employment; provide data in support of Equal Employment Opportunity Program requirements; provide locator and emergency notification data; respond to union requests; identify training requirements; provide salary data for current and projected fiscal guidance, personnel data for current and projected staffing requirements; provide suspense system for within grade increases, length of service awards, performance ratings, pay adjustments and tenure groups; provide data for retirement processing, individual personnel actions; analyze leave usage; investigate complaints, grievances and appeals; respond to requests from courts and regulatory bodies; provide incentive awards information; provide qualified candidates to fill position vacancies; counsel employees on career development; plan dependent services in overseas areas; determine validity of individual claims related to pay adjustments; and for other managerial and statistical studies, records, and reports; To record accidents, incidents, mishaps, fires, theft, etc., involving Government property; and personal injuries/illnesses in connection therewith, for the purposes of recouping damages, correcting deficiencies, initiating appropriate disciplinary action; filing of insurance and/or workmen's compensation claims therefore; and for managerial and statistical reports.

Types of PII Collected: personal, employment, educational, financial, military, and medicail information of current and former employees of the Army and Air Force Exchange Service (Exchange); roster and signature cards of designated timekeepers; payroll and retirement; People who have applied for employment in the Exchange; Any employee of the Exchange who has filed an appeal of an adverse action and/or is contesting a personnel action when the appeal/grievance has been referred to the appropriate General Counsel's office; Exchange Accident Report, Exchange Incident Report, record of injuries and illnesses; investigatory reports; similar relevant documents; Individuals paid by the Exchange . These include, but are not limited to, civilian employees, contractors, family members, and spouse or former spouse; Employees of the Exchange.

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

Data leakage. All information is stored in locked rooms within secure buildings protected by security guards or military police and is accessed only by designated personnel who are properly cleared and trained and have an official need. In addition, integrity of automated data is ensured by internal audit procedures, data base access accounting reports and controls to preclude unauthorized disclosure.

**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.

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

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

Specify.

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

Specify.

**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.

When individuals are in a face-to-face exchange for information, they have the option of withdrawing their desire to provide personal data. When personal information is requested in an on-line environment, the individual has the authority to stop processing the request and not divulge their personal information.

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

Information is required as an employee or applicant of the Exchange.

**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.

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

Information is mandatory and used for administering HR, benefits, workers' compensation, appeals, retirement, accident follow-up, employee legal issues, security clearance and hiring.

**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.	<p>AUTHORITY: 10 U.S.C. 3013 and 8013; and Army Regulation 360-5, Public Information; Army Regulation 215-3, Nonappropriated Funds Personnel Policies and Procedures; and Army Regulation 215-8/AFI 34-211(I), Army and Air Force Service Operations; E.O. 9397</p> <p>PRINCIPAL PURPOSES: Applications, Benefits and Health, Workers' Compensation, Employee Human Resource Administration and Pay, Retirement, Accident, Grievances</p> <p>ROUTINE USE(s): in addition to those disclosures generally permitted under 5 U.S.C §552a(b) of the Privacy Act, these records of information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. §552a(b)(3) as follows: "To authorize access to DoD facilities and the "Blanket Routine Uses" set forth at the beginning of the Army's Compilation of Systems of record Notices also applies to this system."</p> <p>DISCLOSURE: Voluntary. However, failure to provide all the requested information could lead to rejection of application for inadequate data.</p>
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**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.**