



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Exchange Human Resource Management System and Pay System

Army & 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.

Title 10 U.S.C. §3013, "Secretary of the Army"; Title 10 U.S.C. §8013, "Secretary of the Air Force"; Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Service Operations"; Title 421 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, Volume 13, "Non Appropriated Funds Policy"; DoD Directive 7000.14-R, Volume 16, "Department of Defense Debt Management"; and E.O. 9397 (SSN), as amended.

**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: Records provide the basic source of factual data about a person's employment with the Exchange and have various uses. Uses include screening individuals qualifications, determining their employment status, eligibility and employee's rights and benefits, computing length of service and other information needed to provide personnel services; Information is used as the basis for computing civilian pay entitlements, to record history of pay transactions, leave accrued and taken, bonds due and issued, taxes paid; Compliant response to requests from courts and regulatory bodies; providing service and incentive awards; Information is used to determining job advancements. Data may be used to produce reports and statistical analyses of the civilian work force strength trends and composition, verify employment, provide data in support of the Equal Employment Opportunity Program, provide locator and emergency notification, respond to union requests, identify training, provide salary data for current and projected fiscal guidance, personal data for current and projected staffing requirements; provide suspense system for within grade increases, performance ratings, pay adjustments and tenure groups; Information is used for retirement processing including spousal annuities, processing personnel actions, investigate complaints, grievances and appeals, counsel employees on career development, plan dependent services in overseas areas.

PII collected: Individual's name, Social Security Number, Exchange location, home address, date of birth, date hired, leave accrual data, retirement participation data, service award data, citizenship, marital status, sex, security clearance, military status, job code and title, employment category, pay plan, wage schedule, base hourly rate, scheduled work week, Federal and State tax exemptions, type of insurance coverage, retirement benefits including annuities, authorized deductions, life and health insurance coverage, education and experience, licenses, career plans, personnel evaluation reports, awards, training course data, organization in which employed and similar relevant information; Dependent, survivor and beneficiaries names, SSN, date of birth, relationship, marriage date, median name, and address.

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

Risk: data leakage. 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) with an official "need to know" who are responsible for servicing the record in the performance of their official duties. Persons are properly screened and cleared for access. Paper medical records are maintained at the care giver's site; all other records are kept in electronic format.

**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. Attorney staff, HRM, HRSC, LP, IG, Benefits, Hearing Examiner, EEO

**Other DoD Components.**

Specify. Department of the Army and/or Air Force IG Office; Office of the Special Investigations

**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.

Individuals are provided the Privacy Act Statement which includes the use and routine disclosures of the information they voluntarily provide to the Exchange. Individuals when appearing face-to-face with an Exchange associate have the option of withdrawing their desire to provide personal information. When information is requested through on-line environments or through forms, the individual has the authority to stop processing or completion of the form, choosing not to divulge their personal information.

(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.

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

Information is used for proper processing of HR, Pay, Benefits, Workers' Compensation Claims, Appeal of grievances, accident follow-up, employee legal issues and security clearance. Information provided is not used in a means for which it was not collected.

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.

**PRIVACY ACT STATEMENT**

**AUTHORITY:** Title 10 U.S.C. §3013, "Secretary of the Army; Title 10 U.S.C. §8013, "Secretary of the Air Force"; Army Regulation 215-8/AFI 34-211(I), "Army and Air Force Service Operations"; Title 421 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, Volume 13, "Non Appropriated Funds Policy"; DoD Directive 7000.14-R, Volume 16, "Department of Defense Debt Management"; and E.O. 9397 (SSN), as amended.

**PRINCIPAL PURPOSES(S):** Information collected is the basic source of factual data about a person's employment (or future employment) with the Exchange. Data is used to evaluate applicants for hire and once hired used to compute that individual's pay entitlements including hourly pay, salary, leave time, annuities and retirement. Information may also be used to process court orders for child support and/or garnishment of wages and required state and federal taxes.

**ROUTINE USE(S):** Records may be disclosed outside of DoD pursuant to Title 5 U.S.C. §552a(b)(3) regarding DoD "Blanket Routine Uses" published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/BlanketRoutineUses.aspx>. This includes disclosure to Federal agencies, and state, local and territorial governments. Application data may be verified by LexisNexis Risk Solutions or other approved organization approved by the Exchange to complete an applicant's background investigation. Information may be disclosed to the U.S. Treasury for regulated taxes and/or offsets or to court for legal processes. Dependent, beneficiary, survivor information may be disclosed to an outside contractor for processing benefits such as health, retirement, and annuities.

**DISCLOSURE:** Voluntary, however, failure to provide all the requested information may result in the denial of your benefits.

A copy of the Privacy Impact Assessment (PIA) for this collection may be located at [http://www.aafes.com/about-exchange/public-affairs/foia.htm/Privacy Impact Assessments](http://www.aafes.com/about-exchange/public-affairs/foia.htm/Privacy%20Impact%20Assessments).

**Agency Disclosure Notice:**

The public reporting burden for this collection of information is estimated to average 45 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Department of Defense, Washington

Headquarters Services, Executive Services Directorate, Information Management Division, 4800 Mark Center Drive, East Tower, Suite 02G09, Alexandria, VA 22350-3100 (0702-XXXX). Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

**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.**

**DRAFT**