

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:

Enterprise Military Housing II (eMH - II)

2. DOD COMPONENT NAME:

Department of the Navy

3. PIA APPROVAL DATE:

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: foreign nationals are included in general public.)

- | | |
|--|--|
| <input type="checkbox"/> From members of the general public | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

b. The PII is in a: (Check one)

- | | |
|--|--|
| <input type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input type="checkbox"/> Existing DoD Information System | <input checked="" type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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.

The Enterprise Military Housing System (eMH) is an integrated, web based housing application with a common data warehouse and business modules that automate critical headquarter, region and installation Housing business processes. This includes automation government owned, leased and privatized family and unaccompanied housing programs in addition to furnishings and community housing services. The single sign on eMH system contains unclassified housing business modules.

eMH supports the determination of an individual's eligibility for Navy, Marine Corps, Army and Air Force family and unaccompanied housing (including privatized housing) and notification for subsequent assignment to housing or granting a waiver to allow occupancy of private housing, determine priority and list individual's name on appropriate housing waiting list, manage or monitor housing occupancy, facilitate the leasing of community housing, Privatization portfolio management, and provide housing information to military components and government agencies. eMH also supports the community referral program for the Navy, Marine Corps, Army, Air Force and Coast Guard to include determining eligibility for the Rental Property Program.

Personal information collected includes the fields on the DD Form 1746 and contemporary fields supporting the Application for Assignment to Housing including: Full name, DOD ID number, gender, marital status, marriage date, birth date, current home address, permanent home address, work phone number, home phone number, cell phone number, work email address, home email address, rank/rate, pay grade, civilian pay grade equivalent, branch of service, geographic bachelor, voluntarily or involuntarily separated, time involuntarily separated, last unit, location of last assignment, official departure date of last unit, agency or type of civilian, length of service, time remaining on active duty, service start date, expiration of obligated services date, date of rank, projected rotation date, projected rotation location, current unit, reporting date, estimated family arrival date, name of employer, housing allowance begin and stop dates, entitlement condition type, entitlement condition end date, entitlement condition start date, personnel type, handicap and accessible housing requirements, criminal conviction, cigarette smoking habits, power of attorney and type, breed and size of pet.

If applicable, data for related and non-related dependents to include:

Total number in family, full name, DOD ID number, birth date, gender, relation to primary applicant, dependent start date with primary applicant, dependent end date with primary applicant, entitlement condition type, entitlement condition end date, entitlement condition start date, work phone number, home phone number, cell phone number, work email address, home email address, current mailing address, permanent mailing address, rank/rate, current unit, departure date from losing unit, branch of service, pay grade, civilian pay grade equivalent, service start date, date of rank, time remaining on active duty, estimated family arrival date, projected rotation date, criminal conviction, cigarette smoking habits, handicap and accessible housing requirements.

Other pertinent housing information is collected for primary applicants and dependents to include:

particular housing preferences; special health problems; copies of permanent change of station orders; temporary orders; emergency contact full name, home, cell and work phone number and relation; detaching endorsement from prior duty station; and pet health records.

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)

Identification and Verification: To Determine eligibility for housing and housing services, manage housing occupancy, support local and

national security and support the budgeting and distribution of housing entitlements.

Administrative: PII data is used to validate eligibility for family and unaccompanied housing and to provide housing services; establish priority for wait lists for government controlled housing; support the leasing of privatized and community housing; support the budgeting, execution and validation of housing entitlements; determine current and future requirements or government controlled housing; support safety, security, environmental and medical investigations, disaster and emergency response.

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.

Individuals may object to the collection of their PII by not completing the application for housing and housing services. Objection to any collection of PII may be made in person or in writing via letter or email. Completion of a housing application is required to be determined eligible for housing and housing resident support services.

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.

By completing an application for housing, individuals consent to allow Housing to validate housing eligibility requirements. Additionally, consent is provided for Housing to use information for urgent reporting to assist with high level decision making.

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

AUTHORITY: 5 USC 301 Department Regulations

PURPOSE AND USES: The principal purpose is to provide information on the requirement of military personnel for government/ privatization quarters. The information is revised and filed in the Housing Office for use in assisting military personnel to obtain/maintain government/privatization quarters.

EFFECTS OF NONDISCLOSURE: Disclosure of this information is voluntary; however, nondisclosure would make it difficult, if not impossible, to assist an individual in obtaining government/privatization quarters.

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.

DoN Housing entitlement (BAH) program offices such as OPNAV NI and PSDs, Naval Education Training Command (NETC), Navy Bureau of Medicine and Surgery (BUMED), Navy Security (NCIS), Safety (Fire, Police) offices, and United States Marine Corps.

Other DoD Components

Specify.

United States Air Force, United States Army, United States Coast Guard, National Guard, Office of the Secretary of Defense, Defense Manpower Data Center, National Security Agency, Defense Intelligence Agency, Defense Logistics Agency and housing entitlement (BAH) program offices, health, safety, and security offices.

Other Federal Agencies

Specify.

CENSUS Bureau, Department of Homeland Security

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.

eMH Contractors with contracts containing FAR privacy clauses in addition to mandatory non-disclosure agreements. Family and Unaccompanied Housing Privatization Partners and sub-contractors.

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

PII data is collected from individuals completing an application for housing, face to face or phone interview, direct input into website, the Defense Enrollment Eligibility Reporting system (DEERS) and housing privatization partners.

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> E-mail | <input checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> Face-to-Face Contact | <input checked="" type="checkbox"/> Paper |
| <input checked="" type="checkbox"/> Fax | <input checked="" 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) | |

DD1746 Application for Housing

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.

Records are retained for up to three years after termination of housing occupancy and then destroyed. eMH system hard drives and media are destroyed using National Security Agency/Central Security Service (NSA/CSS) approved methods. Paper records containing PII or sensitive information are destroyed using NSA/CSS evaluated crosscut shredders.

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.

SORN NM11101-1 authorities:

- 10 U.S.C 5013, Secretary of the Navy
- 10 U.S.C. 5041, Headquarters, Marine Corps
- 10 U.S.C. 3013, Secretary of the Army
- 10 U.S.C. 8013, Secretary of the Air Force
- 14 U.S.C. Chapter 18--Coast Guard Housing Authorities

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.

OMB Control Number - 0703-0066
Expiration Date - 03/31/2020

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 checked="" 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 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 checked="" type="checkbox"/> Official Duty Address | <input 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 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 checked="" type="checkbox"/> If Other, enter the information in the box below | |

In addition to verify eligibility and provide Services Housing collects:

Current home address, rank/rate, pay grade, civilian pay grade equivalent, branch of service, geographic bachelor, voluntarily or involuntarily separated, time involuntarily separated, last unit, location of last assignment, agency or type of civilian, length of service, time remaining on active duty, service start date, date of rank, projected rotation date, projected rotation location, current unit, reporting date, estimated family arrival date, housing allowance begin and stop dates, entitlement condition type, entitlement condition end date, entitlement condition start date, personnel type, handicap and accessible housing requirements, criminal conviction, cigarette smoking habits, and type, breed and size of pet.

Spouse and child and unrelated applicant information:

Total number in family, relation to primary applicant, dependent start date with primary applicant, dependent end date with primary applicant, entitlement condition type, entitlement condition end date, entitlement condition start date, current mailing address, rank/rate, branch of service, civilian pay grade equivalent, service start date, date of rank, time remaining on active duty, projected rotation date, criminal conviction, cigarette smoking habits, handicap and accessible housing requirements.

Other pertinent housing information is collected for primary applicants and dependents to include:

Particular housing preferences; special health problems; copies of permanent change of station orders; temporary orders; emergency contact, relation; detaching endorsement from prior duty station; and pet health records

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.

Hakim Anbiya, CNIC Privacy Act Compliance Officer , 2019-07-17

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

Record matching. DoD security offices use SSN base resident data from eMH to conduct security investigations. DoD entitlement offices use SSN based data from eMH to track and validate billions of dollars in housing entitlements issued to service members annually.

(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".

SSNs are masked on all end user screens. Access to reports with SSN is limited and restricted to specifically approved users. Reports print with required Privacy Notice cover page. Hard copy reports and forms with SSN are securely stored.

(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

SSN will be replaced by DoD ID Number for Family Housing when a revised DD1746 is released by OSD. SSN's are not collected for unaccompanied housing.

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 most effective when done in collaboration with the Information Owner, Information System Owner, Information System Security Manager, and representatives from the security and privacy organizations, such as the Information System Security Officer (ISSO) and Senior Component Official for Privacy (SCOP) or designees.

c. How will the PII be secured?

(1) Physical Controls. *(Check all that apply)*

- | | |
|---|---|
| <input checked="" type="checkbox"/> Cipher Locks | <input type="checkbox"/> Closed Circuit TV (CCTV) |
| <input checked="" type="checkbox"/> Combination Locks | <input checked="" type="checkbox"/> Identification Badges |
| <input checked="" type="checkbox"/> Key Cards | <input checked="" type="checkbox"/> Safes |
| <input checked="" type="checkbox"/> Security Guards | <input type="checkbox"/> If Other, enter the information in the box below |

(2) Administrative Controls. *(Check all that apply)*

- Backups Secured Off-site
- Encryption of Backups
- Methods to Ensure Only Authorized Personnel Access to PII
- Periodic Security Audits
- Regular Monitoring of Users' Security Practices
- If Other, enter the information in the box below

(3) Technical Controls. *(Check all that apply)*

- | | | |
|---|--|---|
| <input type="checkbox"/> Biometrics | <input checked="" type="checkbox"/> Common Access Card (CAC) | <input checked="" type="checkbox"/> DoD Public Key Infrastructure Certificates |
| <input checked="" type="checkbox"/> Encryption of Data at Rest | <input checked="" type="checkbox"/> Encryption of Data in Transit | <input checked="" type="checkbox"/> External Certificate Authority Certificates |
| <input checked="" type="checkbox"/> Firewall | <input checked="" type="checkbox"/> Intrusion Detection System (IDS) | <input checked="" type="checkbox"/> Least Privilege Access |
| <input checked="" type="checkbox"/> Role-Based Access Controls | <input checked="" type="checkbox"/> Used Only for Privileged (Elevated Roles) | <input checked="" type="checkbox"/> User Identification and Password |
| <input checked="" type="checkbox"/> Virtual Private Network (VPN) | <input checked="" type="checkbox"/> If Other, enter the information in the box below | |

Passwords are also used for technical controls.

d. What additional measures/safeguards have been put in place to address privacy risks for this information system or electronic collection?