

# 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:**

iPERMS SnF - Interactive Personnel Electronic Records Management System Store and Forward

**2. DOD COMPONENT NAME:**

National Guard Bureau

**3. PIA APPROVAL DATE:**

08/25/20

## 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.**

iPERMS SnF – Provides National Guard Human Resource(HR) Managers down to the unit level with the capability to continue all front-end processes (scanning, indexing, verification and batch reports) during all Interactive Personnel Electronic Records Management System (iPERMS) service disruptions (network, power, hardware and software outages). This functionality promotes mission completion during Record Reviews, Selection Boards, SRPs, Mobs/ Demobs and impacts the command leadership and soldiers. Once the connectivity to iPERMS is re-established, all processed personnel images are populated to the service member's record. iPERMS SnF promotes and support life-cycle management of Soldiers records as required by Title 10 US Code (Armed Forces), and Title 44 US Code (Records Management by Federal Agencies). iPERMS SnF supports/ connects to iPERMS which is the system of record and storage for the OMPF and pay substantiating records during a Soldier's active service; maintains and safeguards the OMPF for 62 years after separation; and then transfers the file to the National Archives for permanent retention.

The PII embedded in the digital images of documents in iPERMS includes the following types of information: identification, contact information, military personnel, dependent and family, financial, disability, law enforcement, and education.

**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)

Army Human Resource Management Life Cycle of a Soldier regardless of rank or Army component. For active Soldiers, PII is used to measure qualifications and skills; to identify and authenticate; to measure performance, determine potential and career development; and to support and verify service. For Veterans, PII is used to establish identity; for verification for service; and to determine benefits and entitlements.

PII is used for both mission-related and administrative requirements to support the Army's Human Resource Life Cycle Functions for managing Soldiers and to verify and validate Veterans' eligibility for benefits and entitlements.

**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.

Each individual has an opportunity to object by refusing to provide the requested PII based on the Privacy Act Statement presented at the time of entrance into military service and in each instance thereafter when PII is solicited by a Human Resource specialist/representative.

**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.

Each individual has an opportunity to object to the specific uses of PII by consenting to provide PII based on the Privacy Act Statement presented at the time of entrance into military service and in each instance thereafter when PII is solicited by a Human Resource specialist/representative.

**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

A Privacy Act Statement is provided to the individual by a Human Resources Specialist prior to collection of PII data.

**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

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**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)

AR 600-8-104m, Appendix B

**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.

N/A.

**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.

N1-330-04-1 / RN 600-8-104d3 / ACRS 600A / PERM

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

(3) Retention Instructions.

PERM. TEP. Event is 62 years after end of CY in which it was created. Keep in iPERMS until event occurs and then until no longer needed for conducting business. After 62 years the OMPF is transferred to the National Archives.

**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.

Title 5 USC Section 552a(b)(1), Records maintained on individuals; Title 10 USC Section 3013, Secretary of the Army; Title 44 USC Section 3101, Records management by agency heads, general duties; Title 44 USC Section 3102, Establishment of program of management; Department of Defense Instruction 1336.08, Military Human Resource Records Life Cycle Management; Army Regulation 25-400-2, The Army Records Information Management System (ARIMS); Army Regulation 600-8-104, Army Military Human Resource Records Management; and Executive Order 9397 as amended (SSN).

**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.

N/A.