

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:

TPUMS - Troop Program Unit Management Subsystem

2. DOD COMPONENT NAME:

United States Army

3. PIA APPROVAL DATE:

08/25/20

US Army Deputy Chief of Staff for Personnel / Human Resources Command (HRC)

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.

TPUMS consists of batch processing that maintains Troop Program Unit (TPU) Soldier data on the Total Army Personnel Data Base - Reserve (TAPDB-R). The TPUMS software uses a single transaction input file to receive data from the TPU field management sites; edits the data received according to TAPDB-R and TPU business rules; creates extract files from TAPDB-R that are picked-up via File Transfer Protocol (FTP) by the Regional Level Application Software (RLAS) of the US Army Reserve Command (USARC); and generates one report.

Types of PII collected include personal, contact, dependent, financial, medical, disability, law enforcement, employment, education, and military data.

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)

TPUMS collects PII to update and manage personnel records for TPU Soldiers; to identify and edit data received from RLAS according to TAPDB-R and TPU business rules; and to match Soldier data between records maintained on TAPDB-R and within RLAS. The intended uses are both mission-related and administrative.

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.

Since data are not collected directly from individuals they do not have the opportunity to object to its collection. However, individuals implicitly consent to collection and use of their information at the time of employment or enlistment in the Army, at which time they are provided a Privacy Advisory.

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.

Since data are not collected directly from individuals they do not have the opportunity to object to its collection. However, individuals implicitly consent to collection and use of their information at the time of employment or enlistment in the Army, at which time they are provided a Privacy Advisory.

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

Since PII is not collected directly from individuals they are not provided a Privacy Act Statement or Privacy Advisory by TPUMS. However, individuals are provided a Privacy Advisory at the time of employment or enlistment in the Army, implicitly consenting to use of their data for personnel management purposes.

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.

Army Audit Agency; Assistant Secretary of the Army for Financial Management and Comptroller; Department of the Army Inspector General; Office of the Army Chief of Staff for Information Management; Provost Marshal General; US Army Criminal Investigation Command; US Army Intelligence and Security Command; and USARC.

Other DoD Components

Specify.

Defense Criminal Investigative Service; Defense Finance and Accounting Service; and Department of Defense Inspector General.

Other Federal Agencies

Specify.

N/A

State and Local Agencies

Specify.

N/A

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.

HRC contracts contain language addressing the applicable FAR privacy clauses and acknowledge the sensitivity of PII and describe the importance of protecting and maintaining the confidentiality and security of an individual's PII in the associated task orders. The contractual language keys on training as a fundamental element in creating awareness and understanding of PII and why it is important to control and safeguard. The language also stresses securing PII material and equipment housing PII at the end of a work day. Contractual language directs and requires each contract employee in support of this system to have a valid Secret clearance prior to working on the program. Contracts specifically state that contractor personnel shall adhere to the Privacy Act, Title 5 of the U.S. Code, Section 552A and applicable DOD, Army, and HRC rules and regulations.

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

Specify.

N/A

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 is collected from RLAS and TAPDB-R.

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)

N/A

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

N/A

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

TPUMS is not user accessible.

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.

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

(3) Retention Instructions.

KN. Keep until no longer needed for conducting business, but no longer than 6 years, then delete.

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.

10 United States Code (USC) 3013, Secretary of the Army; 42 USC 10606, The Public Health and Welfare; Department of Defense Directive 1030.1, Victim and Witness Assistance; Army Regulation 600-8-104, Military Personnel Information Management/Records; 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.

System does not collect PII from 10 or more members of the general public in a one-year period.