

## 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:**

PATS - Privacy Act Tracking System

**2. DOD COMPONENT NAME:**

United States Army

**3. PIA APPROVAL DATE:**

08/25/20

Office of the Administrative Assistant (OAA) to the Secretary of the Army  
U.S. Army Records Management & Declassification Agency

### 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 checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input 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 checked="" type="checkbox"/> Existing DoD Information System    | <input 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 Privacy Act Tracking System (PATS) processes all PII breaches for the U.S. Army. PATS is a Common Access Card (CAC) enabled system only accessible by the Department of the Army (DA). DA soldiers and civilians with an active CAC and active Army Knowledge Online (AKO) account can access the system to submit a suspected Personal Identifiable Information (PII) breach report through this application. The report will be reviewed and processed by the Army Privacy Office (APO) within the Records Management and Declassification Agency (RMDA). PII breaches are submitted to the Defense, Privacy, and Civil Liberties Transparency Division (DPCLTD) through the Compliance and Reporting Tool (CART) for final review and adjudication. Initial breach reports may contain PII, but all PII is removed by assigned APO prior to submission to DPCLTD CART. PATS does not retain any PII on reported breaches. Historical breach reports can be retrieved by the individual who initiated the breach report in PATS.

**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)

Initial breach reports may contain PII, but all PII is removed by assigned APO prior to submission to DPCLTD CART.

**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.

Individual(s) should inform their supervisor or privacy official immediately of a suspected or confirmed breach; however if any individual feels uncomfortable is self reporting a breach then a Supervisor can enter report the information surrounding this breach without the use of any PII within PATS on their behalf.

**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.

Individuals PII is automatically retrieved from their active AKO user account.

**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.)

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory | <input checked="" type="checkbox"/> Not Applicable |
|--|---|--|

**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

**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)

**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://dpcltd.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.

KN. Destroy 2 years after last form entry, reply, or submission.

(Disposition pending legal review. Legal review submitted 10 January 2019.)

**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.

**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.