

## 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:**

RPAS - Retirement Points Accounting System

**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.**

The Retirement Points Accounting System (RPAS) updates the Total Army Personnel Data Base - Reserve (TAPDB-R) with online entries and batch processes using input from external and internal interfaces. RPAS records and maintains retirement points earned by Soldiers throughout their careers, and automatically produces annual retirement point statements, revised statements, terminal statements for individuals who become losses to Army Reserve strength, Twenty Year Letters, and Non-Participation Letters. A historical record is maintained for all retirement points credited annually to Army Reserve Soldiers. This record supports issuance of official Statements of Service and Certifications of Eligibility for Retired Pay and for replying to routine inquiries. RPAS identifies officers who are non-participants but eligible for retired pay at age 60 or early drop. RPAS also supports the Survivor Benefit Plan (SBP). A SBP packet is mailed to eligible Reservists, and elected options are recorded. RPAS screens provide users the capability to request statistical reports using data from TAPDB-R, and to interactively update RPAS data elements. RPAS submits Retired Pay Eligibility transactions to the Defense Retiree and Annuity Pay System. RPAS receives transactions containing Active/Inactive Duty training data from the Defense Joint Military Pay System - Reserve Component, and also receives RCCS data transactions from the Soldier Management System Webified Suite of Systems consisting of Corrected Summary records originating from units. The TAPDB-R-related data elements are updated as a by-product of these actions.

PII collected includes personal, contact, dependent, financial, medical, disability, education, and military record 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)

Verification, identification, authentication, and data matching: To identify the individual, to verify and authenticate training and participation, to record and maintain retirement points earned by Soldiers during their Army careers, to verify their participation in various benefit programs, and to produce retirement point and other statements used to determine retired pay eligibility for Army Reserve Soldiers. Administrative use.

**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 are not involved in the data collection process. However, Soldiers consent to capture and use of their PII at the time of employment 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.

Individuals are not involved in the data collection process. However, Soldiers consent to capture and use of their PII at the time of employment 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

Individuals are not involved in the data collection process. However, Soldiers consent to capture and use of their PII at the time of employment in the Army, at which time they are provided a Privacy Advisory.

**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 Chief, Army Reserve, Provost Marshal General, US Army Criminal Investigation Command, US Army Intelligence and Security Command, and US Army Reserve Command.

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

RPAS extracts data from its enterprise database (TAPDB-R); Defense Joint Military Pay System - Reserve Component owned by the Defense Finance and Accounting Service; and Army Recruiting Information Support System and Soldier Management System Webified Suite of Systems owned by HRC); and PII is extracted from source documents: MDA Form 1379, US Army Reserve Components Unit Record of Reserve Training, DA Form 1380, Record of Individual Performance of Reserve Duty Training, Leave and Earnings Statements, DD Form 214, Certificate of Release or Discharge from Active Duty; DD Form 220, Active Duty Report and DFAS Form 702, Master Military Pay Account.

**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 type="checkbox"/> Face-to-Face Contact                                     | <input type="checkbox"/> Paper  |
| <input checked="" type="checkbox"/> Fax   | <input 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) |   |

DA Form 1379, DA Form 1380

**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.

**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.

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