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:

WHS Electronic Records Manager (ERM) NIPRNET

2. DOD COMPONENT NAME:	3. PIA APPROVAL DATE:
Washington Headquarters Service	06/25/2025

Executive Services Directorate/Directives Division and Acquisition Directorate

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: *(Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)*

☐ From members of the general public

☐ From Federal employees

☒ from both members of the general public and Federal employees

☐ 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.

WHS ERM is an electronic records management system that stores forms, administrative management, PRA, and DoD Issuances, Plain Language Program that pertains to the WHS/ESD/Directives Division; and for WHS/AD stores contracting related documents. Each dataset is only accessible by its owned component. PII collected by the system includes, work address, work email address, work phone, position/title, DoD ID number, home phone/cell name and contracting officer's name.

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)*

For administrative use and verification of user login.

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.

The Directives Division requires the PII for administrative purposes. The WHS/AD includes PII information on certain contracting documents.

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.

PII is required to complete the mission

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

Privacy Advisory: This system contains personally identifiable information and is protected in accordance with the Privacy Act of 1974, as amended; and DoD 5400.11-R.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?
(Check all that apply)

☒	Within the DoD Component	Specify.	Within WHS/ESD/Directives Division, and within WHS/AD.
☐	Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	
☐	Other Federal Agencies *(i.e. Veteran's Affairs, Energy, State)*	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

ERM does not share stored records or data with any other systems. There are no interconnectivities with other 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)*

☐ In-Person Contact   ☐ Paper

☐ Fax   ☐ Telephone Interview

☐ Information Sharing - System to System   ☐ Website/E-Form

☒ Other *(If Other, enter the information in the box below)*

DD Form 106, DD Form 818, DD Form 818-1, DD Form 67, DD Form 3128, and ODA&M Form 1 for Directives Division. Information is listed within the WHS/AD contract file.
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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 <u>retrieved</u> 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://dpcld.defense.gov/Privacy/SORNs/
     o*r*

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.

Directives Division does not retrieve information by PII, information is retrieved by issuance number. Contract documents are retrieved by record number equating to the contract action number produced by the contract writing system.

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.   GRS 1.1, item 010 (DAA-GRS-2013-0003-0001)

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

(3) Retention Instructions.

In accordance with the OSD Records Disposition Schedule (RDS) for WHS AD records file number 206-09.1, Financial Transaction Records related to Procuring Goods & Services, Paying Bills, Collecting Debts, & Accounting, Temporary. Cut off after final payment or cancellation. Destroy 10 years after cutoff applies. For WHS/ESD/DD records OSD RDS file number 103-01.1 Policy Files-Issuances Permanent. Cut off when superseded or obsolete. Transfer to NARA 25 years after cutoff applies.

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 statue 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.

AUTHORITIES: 10 U.S.C. 113, Secretary of Defense; 44 USC Chapter 29, Records Management by the Archivist of the United States and by the Administrator of General Services; OMB M-19-21 and M-23-07, Memorandum for Heads of Executive Departments and Agencies-Transition to Electronic Records; Federal Acquisition Regulation, current edition, Subchapter G--Contract Management; DoD Directive 5105.53, Director of Administration and Management; DoD Directive 5110.4, Washington Headquarters Services; DoD 5015.02, DoD Records Management Program; DoDI 5025.01, DoD Issuances Program

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.

WHS Electronic Records Manager is not directly subject to the Paperwork Reduction Act because their primary responsibility is to manage internal records. The PRA places the responsibility on the activity that collects the information, and the ERM's job is to manage the records that result from those activities.