

## 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:**

DoD National Capital Region Mass Transportation Benefit Program

**2. DOD COMPONENT NAME:**

Washington Headquarters Service

**3. PIA APPROVAL DATE:**

06/28/21

Pentagon Services Division

### 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.**

To manage the DoD National Capital Region Mass Transportation Benefit Program for DoD military and civilian personnel applying for and in receipt of fare subsidies. Used as a management tool for statistical analysis, tracking, reporting, evaluation program effectiveness, and conducting research.

**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)

Authentication, identification, verification, and administrative use IAW 5 U.S.C. 7905, 10 U.S. C. 113, 10 U.S.C. 131, E.O. 12191, E.O. 13150, E.O. 9397, as amended using DD FORM 2845. In addition, IAW SORN DWHS D01

**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.

(1) If yes; They can opt not to continue with the application following notification.

(2) If no; The information is required to validate their employment as a federal employee and the organization that has hired them. This information is used to bill back the organization for the benefits distributed to the employee.

**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.

(1) The employee has to validate that the information included in their application for benefits is true or they can opt out of submitting their application.

**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

**AUTHORITY:** 5 U.S.C. 7905, Programs to encourage commuting by means other than single-occupancy motor vehicles; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 131, Office of the Secretary of Defense, DoD Directive 5110.4, Washington Headquarters Services (WHS); DoD Instruction 1000.27, Mass Transportation Benefit Program (MTBP); E.O. 12191, Federal Facility Ride Sharing Program; E.O. 13150, Federal Workforce Transportation; and E.O. 9397 (SSN), as amended

**PURPOSE:** To manage the DoD National Capital Region Mass Transportation Benefit Program for DoD military and civilian personnel applying for and in receipt of fare subsidies. Used as a management tool for statistical analysis, tracking, reporting, evaluating program effectiveness, and conducting research.

**ROUTINE USE(S):** In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, the records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as listed in the applicable system of records notice located at: <https://dpcl.d.defense.gov/Privacy/SORNSIndex/DOD-wide-SORN-Article-View/Article/570595/dwhs-d01/>

**DISCLOSURE:** Voluntary; however, failure to provide the requested information may result in disapproval of the Mass Transportation Benefit Program Application.

**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.

With WHS/FMD for financial management/invoice validation of Department of Transportation program reports/invoicing.

☒ Other DoD Components

Specify.

DoD Component Serviced by WHS

☐ Other Federal Agencies

Specify.

☒ State and Local Agencies

Specify.

Washington Metropolitan Area Transit Authority (WMATA) in order for WMATA to distribute DoD NCR program participants benefits.

☒ 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.

KCK Technologies is the current contract support team in the WHS/ESD/PSD office who is responsible for application processing and program customer service.

☐ 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

Name is retrieved from DoD Common Access Card.

**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)

- The system uses PKI and reads information from the client's certificate which is usually stored on their CAC; to access and use the web based MTBP application DD Form 2845

- Paper form, DD Form 2845, for those without a CAC or those unable to access the electronic application.

**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

DWHS D01

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.

**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.

**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.

(1) OMB Control number is not required as stated in DoDM 8910.01, Volume 2 and DD Form 2845.

Note: Contractors only review and enter federal government employee information from paper forms for those federal employees who are unable to access the electronic application; however no contractor information is entered into the system.

Reference: DoD Information Collections Manual: Procedures for DoD Public Information Collections - NUMBER 8910.01, Volume 2

[https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodm/891001m\\_vol2.pdf](https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodm/891001m_vol2.pdf)