

## 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:**

06/07/23

Pentagon Services Division

### 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.**

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 10 U.S. C. 113, 5 U.S.C. 7905, E.O. 12191, E.O. 13150, DoDI 1000.27, and E.O. 9397, as amended using DD FORM 2845 until the transition to using DoD ID versus the use of last four of the SSN. IAW SORN DoD 0009

**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) They can opt not to continue with the application however, they will be unable to participate in the program because the information is required to validate their employment as a federal employee and the organization that has hired them.

**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 information is required to approve the application for benefits and ensure that the individual is not enrolled in both MTBP and the Parking Program. They have the option to submit or not submit 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:** 10 U.S.C. 113, Secretary of Defense; 5 U.S.C. 7905, Programs to encourage commuting by means other than single-occupancy motor vehicles; Executive Order (E.O.) 12191, Federal Facility Ridesharing Program; E.O. 13150, Federal Workforce Transportation; DoD Instruction 1000.27, Mass Transportation Benefit Program (MTBP); and E.O. 9397 (SSN).

**PURPOSE:**

- A. To manage and administer the DoD Mass Transportation Benefit Program for military and civilian personnel (to include non-appropriated fund (NAF) employees) applying for and in receipt of a commuter subsidy.
- B. To evaluate employee participation in the program.
- C. To provide audit capabilities and track the use of funds to support the program; ensure appropriate accountability; and prevent misuse of the funds involved.
- D. To report required information for program management and oversight to leadership and key stakeholders.

**ROUTINE USES:** 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://www.federalregister.gov/documents/2022/01/07/2022-00118/privacy-act-of-1974-system-of-records>

**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/system exchange, both within your DoD Component and outside your Component?**  
(Check all that apply)

- |   |          |   |
|---|----------|---|
| <input checked="" type="checkbox"/> Within the DoD Component  | Specify. | With WHS/FMD for financial management/invoice validation of Department of Transportation program reports/invoicing.   |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. | DoD Component Serviced by WHS   |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)   | Specify. |   |
| <input checked="" type="checkbox"/> State and Local Agencies  | Specify. | Washington Metropolitan Area Transit Authority (WMATA) in order for WMATA to distribute DoD NCR program participants benefits.                              |
| <input checked="" type="checkbox"/> 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. |
| <input type="checkbox"/> 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)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Individuals            | <input type="checkbox"/> Databases          |
| <input type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> 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)

- |   |   |
|---|---|
| <input type="checkbox"/> E-mail   | <input checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact  | <input type="checkbox"/> Paper  |
| <input type="checkbox"/> Fax  | <input type="checkbox"/> Telephone Interview  |
| <input type="checkbox"/> Information Sharing - System to System                   | <input checked="" type="checkbox"/> Website/E-Form  |
| <input type="checkbox"/> 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

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.

**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.

In accordance with the OSD Records Disposition Schedule File number 206-08.3 Transportation Subsidy Program Individual Case Files. Temporary cut off after employee participation concludes. Destroy 2 years after cut off.

**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 U.S.C. 113, Secretary of Defense; 5 U.S.C. 7905, Programs to encourage commuting by means other than single-occupancy motor vehicles; Executive Order (E.O.) 12191, Federal Facility Ridesharing Program; E.O. 13150, Federal Workforce Transportation; DoD Instruction 1000.27, Mass Transportation Benefit Program (MTBP); and E.O. 9397 (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.

Per the Directives Division Collections Section; the PRA does not apply