

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 Acquisition Modernization Initiative (AMI) NIPRNET

2. DOD COMPONENT NAME:

Washington Headquarters Service

3. PIA APPROVAL DATE:

08/04/2026

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.

The primary purpose of the system is to establish a collaborative environment for uploading acquisition-related documents, including memorandum, contracting forms, funding documents, policy documents, and other acquisition package files. These documents are submitted by contracting officers and Contracting Officer Representatives (CORs) to support acquisition personnel in making pre-award and post-award determinations.

This system tracks and displays only the history of work activity related to the document approval process, including non-decision activity statuses, workload assignments, and statistical reports managed by leadership.

Vendor information—such as vendor name, official duty address, work e-mail address, official duty telephone number, and position/title—is loaded into the system temporarily. These reference documents are then transferred to the final records retention system for permanent storage.

The types of Personally Identifiable Information (PII) present in documents include: Name(s), Official Duty Address, Work E-mail Address, Official Duty Telephone Number, Position/Title, and DoD ID Number (appearing only in digital signatures).

The complete acquisition package within the AMI system is transferred to and maintained in the final records retention system. Only the Performance Work Statement (PWS), Independent Government Cost Estimate (IGCE), and supporting documents are retained in the system for reference in upcoming actions.

NOTE: Only Government personnel will have access to the AMI system. This is where Name(s) and User ID as identified on their CAC are used for authentication purposes for system access.

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)

Low-impact Personally Identifiable Information (PII) is required in documents related to the execution of government contracts. This information is essential for establishing legally binding agreements with commercial vendors and other government agencies. Authentication, verification, and mission-critical use of PII are necessary components, as this data supports the agency's mission objectives. Without this information, there would be no effective means of fulfilling contractual and operational requirements.

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.

Pursuing a career as a contracting professional in government acquisition requires a thorough understanding of the processes involved in executing government contracts. This principle also applies to vendors who supply goods and services to the government. Role designations and digital signatures are fundamental requirements across numerous contract-related documents and various systems associated with the acquisition process. Vendor information is typically collected through final award-oriented contracting documents to ensure accuracy.

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.

The primary purpose of establishing legally sufficient government contract documents is to support mission objectives. Recognized exceptions include Freedom of Information Act (FOIA) requests and litigation inquiries. In such cases, documents are redacted as appropriate by Policy Reviewers prior to release. However, FOIA and litigation scenarios are outside the scope of the AMI system.

Additionally, individuals—whether government contracting professionals or vendors—who object to the inclusion of information necessary for executing government contracts would be unable to effectively perform roles related to contracting activities. This requirement applies to both government and non-government personnel.

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; 10 U.S.C. § 133b, Under Secretary of Defense for Acquisition and Sustainment; e-Government Act of 2002, Public Law 107-347, Section 204; Public Contracts, Public Law 111-350, Sections 101, 6101, 7101, 8101 Digital Accountability and Transparency Act of 2014, Public Law 113-101; 41 U.S.C. Chapter 7, Office of Federal Procurement Policy; 41 U.S.C. Chapter 13, Acquisition Councils (Parts 1301-1304); 41 U.S.C. Chapter 35, Truthful Cost or Pricing Data (Parts 3501-3509); Executive Order 12931, Federal Procurement Reform; DoD Directive 5135.02, Under Secretary of Defense for Acquisition and Sustainment; DoD Directive 5105.53, Director of Administration and Management; DoD Directive 5110.4, Washington Headquarters Services; DoD Instruction 5000.35, Defense Acquisition Regulations (DAR) System (covering requirements in the Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement (DFARS), and DFARS Procedures, Guidance, and Information (PGI))

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://www.federalregister.gov/documents/2017/03/02/2017-04037/privacy-act-of-1974-system-of-records>

DISCLOSURE: Voluntary; however, failure to provide the requested information may result in vendors not being awarded the contract and federal personnel not being able to complete required duties to make a determination.

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.

Contracting is executed based on the requiring Office DoDAAC for all supported government field activities.

☒ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

All federal organizations utilizing AD for contracting.

☒ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

Specify.

All federal organizations utilizing AD for contracting.

☐ 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.

Low impact PII is addressed in a Non-Disclosure Agreement attached to the contract that requires signatures by Contractor personnel. The contractor is also required to take all DoD training which includes PII training. It is not feasible to list every contractor we conduct business with.

☐ Other (e.g., commercial providers, colleges).

Specify.

FOIA, Litigation Requests w/Redaction, & Audits

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

Low impact PII is applied to contract related documents at the direction of warranted contracting professionals throughout the acquisition process. The PII content does not come from any other system.

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) | |

Low impact PII is collected in documents sent through email or the SAFE site when appropriate. Some information could be collected during meetings by phone or Teams, however, that information is only used to facilitate communication activities.

To the extent any of the PII applies to the actual contract documents, the information will be applied to documents uploaded to AMI.

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.

According to the OSW RDS

Temporary. Cut off and destroy immediately after copying to a recordkeeping system or otherwise preserving.

AUTHORITY: GRS 5.1, Item 020 (DAA-GRS-2016-0016-0002)

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.

AUTHORITY: 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 133b, Under Secretary of Defense for Acquisition and Sustainment; e-Government Act of 2002, Public Law 107-347 Section 204; Public Contracts, Public Law 111-350 Sections 101, 6101, 7101, 8101; Digital Accountability and Transparency Act of 2014, Public Law 113-101; 41 U.S.C. Chapter 7, Office of Federal Procurement Policy; 41 U.S.C. Chapter 13, Acquisition Councils (Parts) 1301-1304; 41 U.S.C. Chapter 35, Truthful Cost or Pricing Data (Parts) 3501-3509; Executive Order 12931, Federal Procurement Reform; DoD Directive 5135.02, Under Secretary of Defense for Acquisition and Sustainment; DoD Directive 5105.53, Director of Administration and Management; and DoD Directive 5110.4, Washington Headquarters Services; DoD Instruction 5000.35, Defense Acquisition Regulations (DAR) System (covers requirements in Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement (DARS) and DFARS Procedures, Guidance and Information (PGI).

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.

Based on a review of the PIA, an OMB Control Number under the Paperwork Reduction Act (PRA) is not required for this system. The PIA clarifies that the only information collected from vendors is basic identifying information (name, title, work email, phone, etc.) strictly for the purpose of executing and signing contract award documents. Under The system facilitates reviews and approvals, provides management workload and reporting metrics, and gives an overall business process assessment. , collecting basic contact information solely to acknowledge receipt or sign a document is exempt and does not constitute a "collection of information."