

## 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:**

Unified Communications (UNCOMM)

**2. DOD COMPONENT NAME:**

Defense Finance and Accounting Service

**3. PIA APPROVAL DATE:**

04/07/20

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)   |

**b. The PII is in a:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" type="checkbox"/> Existing DoD Information System    | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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.**

Unified Communications (UNCOMM) includes multiple component systems. One of the systems, the Call Recording Application (CRA), records telephone conversations between customers and customer service representatives (CSRs) in DFAS' contact centers. The centers are located in Cleveland, Indianapolis, Rome, and Columbus. CRA captures a sampling of the computer screens used by CSRs to answer inquiries. This system facilitates the process of monitoring and evaluating the recorded audio and computer screens used by CSRs in order to provide training, collect data in support of the CSRs' annual performance evaluation, and provide information used for business process improvements. The recorded audio and captured systems' screen records can potentially include any combination of the following information: home address, financial/payroll information, marital status, mother's middle or maiden name, personal email address, telephone number, dependent information, tax status, allotment, garnishment, debt, name, SSN, or other payroll or personal information provided by the customer.

**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)

The information is required by the customer service representative to authenticate the caller and to be able to search for their record in the various systems.

**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 interactive voice response (IVR) system, which front ends the call flow process, informs the caller that the conversation is being recorded for quality evaluation purposes. At that point, the caller can hang-up. Otherwise, the call will be answered by a customer service representative (CSR). If the customers objects to the CSR, then the conversation is terminated and the inquiry will not be processed.

**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.

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**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.)

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory | <input type="checkbox"/> Not Applicable |
|--|--|---|

The interactive voice response (IVR) system, which front ends the call flow process, informs the caller that the "conversation is being recorded for quality evaluation purposes." At that point, the caller can hang-up. Otherwise, the call will be answered by a customer service representative (CSR). If the customers objects to the CSR, then the conversation is terminated and the inquiry will not be processed.

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

- |  |          |  |
|--|----------|--|
| <input checked="" type="checkbox"/> Within the DoD Component   | Specify. | Customer care center personnel and management on a need-to-know basis. |
| <input checked="" type="checkbox"/> Other DoD Components   | Specify. | Investigatory agencies (e.g. Inspector General)                        |
| <input type="checkbox"/> Other Federal Agencies  | Specify. |  |
| <input type="checkbox"/> State and Local Agencies  | Specify. |  |
| <input 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. |  |
| <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 |   |

**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 type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> Face-to-Face Contact                                     | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax  | <input checked="" type="checkbox"/> Telephone Interview                        |
| <input 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) |  |

**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://dpcltd.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.

per the DFAS 5015.2-M vol.2, Schedule 7900, Rule 3.01 -- Destroy/delete inactive file (6) years after account terminated or when no longer needed for investigative or security purposes, whichever is later

**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.

EO 12862 (Customer Service); and EO 9397 Social Security Number (SSN) as amended.

**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.

DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections." Page 20, Enclosure 3, Paragraph 8b (1) Items Not Considered Public Information Collections: Affidavits, oaths, affirmations, certifications, receipts, changes of address, consents, or acknowledgments, provided that they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument.