

## 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:**

Simplified Workflow Access Protocol (SWAP)

**2. DOD COMPONENT NAME:**

Defense Finance and Accounting Service

**3. PIA APPROVAL DATE:**

04/17/19

### 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.**

For the purpose of this PIA and the template being used, DD FORM 2930, JUN 2017, Section I: PII Description Summary (For Public Release), a. The PII is: (Check one. Note: foreign nationals are included in the general public.), Simplified Workflow Access Protocol (SWAP) is required to select the following option: The PII is from both members of the general public and Federal employees and/or Federal contractors. SWAP is not accessible to the general public, selection of this option (which considers foreign nationals as part of the general public) is necessary due to the Defense Finance Accounting Service employing foreign national civil servants who use the SWAP workflow application for their DD FORM 2875 system access needs. No other members of the general public can access the SWAP website.

Simplified Workflow Access Protocol (SWAP) is a web-based, workflow application used for DD FORM 2875, System Authorization Access Request (SAAR), form processing. SWAP enables Public Key Infrastructure (PKI) Common Access Card (CAC) Authentication which requires a verified identity and valid certificate with authorized access to use the application. The work flow aspect of the application provides a seamless routing pattern throughout the approval process which is customized to the requirements of each system it services. The status of any given form can be tracked throughout the approval process, and it provides a permanent record of submissions and actions in a nonvolatile archive.

Date of Birth (DOB). The DOB is a Personnel Security Office (PSO) requirement for validating security on individuals submitting forms. The field is only visible to PSO approvers.

Electronic Data Interchange Personal Identifier (EDIPI) from the CAC: SWAP requires CAC authentication to access the system. CAC information is printed on the DD FORM 2875 for validation of information by submitters, supervisors, and approvers of the request and is stored in SWAP.

**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)

Verification, identification, authentication

**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.

Collection of the Date of Birth is needed to validate an individual's security clearance. EDIPI is included in the user's digital signature on the DD FORM 2875 form and is used to validate identity.

**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 data collected from the user is required as part of the DD FORM 2875 process for system access.

**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

This system contains Privacy Act Data

Authority: Executive Order 10450, 9397 as amended, and Public Law 99-474, the Computer Fraud and Abuse Act

Purpose of use: To record names and social security numbers for the purpose of validating the trustworthiness of individuals requesting access to Department of Defense (DOD) systems and information.

Routine uses: Those generally permitted under the 5 U.S.C. 522A(B) of the Privacy Act as required.

DISCLOSURE: Disclosure of this information is voluntary; however, failure to provide the requested information may impede, delay or prevent further processing of this request.

Note: Records may be maintained in both electronic and/or paper form.

**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. DFAS, Navy, Marine Corps

Other DoD Components

Specify. United States (US) Naval Academy, Navy Postgraduate School, US Naval War College

Other Federal Agencies

Specify. US Veterans Administration

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

The SWAP mainframe system maintains archived forms for individuals. Systems providing PII through interface feeds: Cash History On-Line Operator Search Engine and Departmental Financial Reporting Reconciliation 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)

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)

**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

T5210

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.

DFAS 5015.2-M, Vol 2, Schedule 7900, Rule 3.01

System Access Authorization Request (DD FORM 2875) for Systems requiring special accountability, e.g., those containing information that may be needed for audit or investigative purposes and those that contain classified records. Destroy/delete inactive file 6 years after user account is terminated or password is altered, 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.

U.S. Code Chapter 55, Pay Administration; 37 U.S.C. Chapter 19, Pay and Allowance of the Uniformed Services; Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Vol 7A; and E.O. 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.

SWAP does not undertake collection of information directed to 10 or more individuals annually.