

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:

Non-Appropriated Funds Great Plains (NAFSGP)

2. DOD COMPONENT NAME:

Defense Finance and Accounting Service

3. PIA APPROVAL DATE:

06/26/19

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.

NAFSGP has vendor's related information (names, Social Security Number (SSN), employer identification numbers, phone numbers, addresses, email addresses, account numbers, bank routing numbers); accounting information (ledgers, bank routing numbers, tax information, installation code); accounts payable and receivables information; financial transactions and disbursements related information.

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, data matching for checks, Electronic Funds Transfer (EFT) and Wired Payments; and for verification and authentication of report data.

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.

PII is required in order to receive payments. Vendors or Temporary Duty (TDY) individuals can refuse to provide banking information as they can elect payment via check. The Internal Revenue Service (IRS) requires a SSN for any payments of winnings over \$600.00.

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 information is required for payment purposes and reporting to the IRS.

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

PII collected is required in order to receive payments. Individual Information is collected on a W9 form which includes a Privacy Act Notice. The Privacy Act Notice on the W9 form states the following:
 Section 6109 of the Internal Revenue Code requires you to provide your correct Taxpayer Identification Number (TIN) to persons (including federal agencies) who are required to file information returns with the IRS to report interest, dividends, or certain other income paid to you; mortgage interest you paid; the acquisition or abandonment of secured property; the cancellation of debt; or contributions you made to an IRA, Archer MSA, or HSA. The person collecting this form uses the information on the form to file information returns with the IRS, reporting the above information. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation and to cities, states, the District of Columbia, and U.S. commonwealths and possessions for use in administering their laws. The information also may be disclosed to other countries under a treaty, to federal and state agencies to enforce civil and criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. You must provide your TIN whether or not you are required to file a tax return. Under section 3406, payers must generally withhold a percentage of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to the payer. Certain penalties may also apply for providing false or fraudulent information.

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. US Army Installation Management Command-Banking Electronic File Transfer (EFT) by encrypted mail.
- Other DoD Components Specify. Other US Army Military Installations in Continental United States (CONUS) and Outside Continental United States (OCONUS).
- Other Federal Agencies Specify. Internal Revenue Service - 1099 File; filing information return electronically.
- 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

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 T7280b

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 12/18/2018

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.

Cut off at end of fiscal year. Destroy 10 years after cutoff.

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.

DoD 7000.14R Volume 9, Chapter 8; Volume 8 Chapter 8 Paragraph 080602; Volume 5 Chapter 28; Volume 7A Chapter 50 subparagraph 500104.A

26 United States Code Section 162(a)

IRS Ruling 99-7

Joint Travel Regulation

IRS Publication 1220

IRS FS-2007-26

E.O. 9397 (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.

Per discussion with DFAS Privacy Office and Washington Headquarter Services Executive Services Directorate (WHS ESD), it has been determined that NAFS-GP is not the point of entry for the data, and therefore, does not require licensing. WHS is recommending that DFAS standardize the process for submission for prizes/winnings. As it stands, Morale, Welfare and Recreation (MWR) centers throughout the Army (both CONUS and OCONUS) are collecting information from the public through various instruments. These collections are not accountable and DFAS is not capturing the burden on this. The IRS is the core of the collection as the IRS requires that earnings over \$600 must be reported. The MWR (Army) is the organization that reports the earnings to DFAS and in turn DFAS reports the payments to the IRS when accomplished. From this process perspective the collection requirement is from the IRS and DFAS uses their forms for reporting. DFAS is the reporting entity. The standardization of this process is a future endeavor and per DFAS Privacy office and WHS ESD, no OMB data collection is required.