

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 Information Standard System (NAFISS)

2. DOD COMPONENT NAME:

Defense Finance and Accounting Service

3. PIA APPROVAL DATE:

08/13/18

(DFAS)

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

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

- From members of the general public From Federal employees and/or Federal contractors
- From both members of the general public and Federal employees and/or Federal contractors 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.

NAFISS has vendor and individual related information (names, social security numbers, employer identification numbers, phone numbers, addresses, email addresses, account numbers, bank routing numbers) used to provide W2G for gaming winnings, to pay contracts and to pay Temporary Duty (TDY) settlements; accounting information (ledgers, bank routing numbers, tax information, installation code); accounts payable and receivables information; financial transactions and disbursement 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 check, Electronic Funds Transfer (EFT) and Wired payments; and for verification and authentication of report data. Mission-related used to account for TDY settlements, contract payments and providing of a W2G for individuals to use in reporting personal income tax owed.

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.

Vendors and individuals will need to provide Personally Identifiable Information (PII) in order to receive payments. The only information that vendors or TDY individuals can refuse to provide is banking information; since they can elect to get paid via check. In accordance with 26 CFR 1.6041-10, "Return of Information as to Payments of Winnings from Bingo, Keno, and Slot Machine Play, states that "Every person engaged in a trade or business and who, in the course of such trade or business, makes a payment of reportable gambling winnings must make an information return with respect to such payment. For bingo, the term "reportable gambling winnings" means winnings of \$1200 or more from one bingo game without reduction for the amount wagered."

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 PII information is needed for payment purposes and tax reporting to Internal Revenue Service (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.)

- Privacy Act Statement Privacy Advisory Not Applicable

A Privacy Act Statement is provided: 1) to all individuals for gaming winnings over \$1200 "PRIVACY ACT STATEMENT 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. 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.”; 2) to all vendors on the EFT request form “PRIVACY ACT STATEMENT The following information is provided to comply with the Privacy Act of 1974 (P.L. 93-579). All information collected on this form is required under the provisions of 31 U.S.C. 3322 and 31 CFR 210. This information will be used to transmit payment data, by electronic means to vendor's financial institution. Failure to provide the requested information may delay or prevent the receipt of payments.”; 3) to all government travelers on the Department of Defense (DD) 1610 for a travel request “PRIVACY ACT STATEMENT (5 U.S.C. 552a) DD FORM 1610 (BACK), MAY 2003 AUTHORITY: 5 U.S.C. 5701, 5702, and E.O. 9397. PRINCIPAL PURPOSE(S): Used for reviewing, approving, and accounting for official travel. SSN is used to maintain a numerical identification system for individual travelers. ROUTINE USE(S): None. DISCLOSURE: Voluntary; however, failure to provide the requested information may delay or preclude timely authorization of travel request.” ; 4) to all government travelers on the DD 1351-2 for a voucher settlement “PRIVACY ACT STATEMENT AUTHORITY: 5 U.S.C. Section 301; Departmental Regulations; 37 U.S.C. Section 404, Travel and Transportation Allowances, General: DoD Directive 5154.29, DoD Pay and Allowance Policy and Procedures; Department of Defense Financial Management Regulation (DoDFMR) 7000.14.R., Volume 9; and E.O. 9397 Social Security Number (SSN), as amended. PRINCIPAL PURPOSE(S): To provide an automated means for computing reimbursements for individuals for expenses incurred incident to travel for official Government business purposes and to account for such payments. Applicable SORN: T7333 (<http://privacy.defense.gov/notices/dfas/T7333.shtml>). ROUTINE USE(S): Certain "Blanket Routine Uses" for all DoD maintained systems of records have been established that are applicable to every record system maintained within the Department of Defense, unless specifically stated otherwise within the particular record system notice. These additional routine uses of the records are published only once in each DoD Component's Preamble in the interest of simplicity, economy, and to avoid redundancy. Applicable SORN: <http://dpclo.defense.gov/privacy/SORNS/component/dfas/preamble.html>. DISCLOSURE: Voluntary; however, failure to furnish the requested information may result in total or partial denial of the amount claimed. The Social Security Number is requested to facilitate the possible collection of indebtedness or credit to the DoD traveler's pay account for any residual or shortage.”.

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. | US Army Installation Management Command-Banking EFT by encrypted mail |
| <input checked="" type="checkbox"/> Other DoD Components | Specify. | Other US Army Military Installations in Continental United States (CONUS) and Outside Continental United States (OCONUS); DFAS-Japan |
| <input checked="" type="checkbox"/> Other Federal Agencies | Specify. | Internal Revenue Service (IRS) - 1099 file; filing information return electronically |
| <input type="checkbox"/> State and Local Agencies | Specify. | No state or local agencies |
| <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. | NA |
| <input type="checkbox"/> Other (e.g., commercial providers, colleges). | Specify. | NA |

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 checked="" type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input checked="" type="checkbox"/> Other Federal Information Systems | |

1. Internal Revenue Service (IRS) Form W-9, Request for Taxpayer Identification Number (TIN)
2. Vendor Contract Request
3. Invoice
4. Email (from individual vendor)

5. Integrated Army Travel System (IATS) travel payment

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- | | |
|---|--|
| <input checked="" 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 checked="" type="checkbox"/> Paper |
| <input checked="" 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) | |

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.

SORN is pending publication in the Federal Register

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.

Retain records for 10 years per DFAS 5015.2-M, Schedule 7900 Electronic Record-keeping.

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.

Department of Defense (DoD) 7000.14-R: 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)
Internal Revenue Service (IRS) Ruling 99-7
Joint Travel Regulation (JTR)

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.

TBD for the date for the 60 and/or 30 day notice and Federal Register citation.