

## 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:**

Consolidated Cash Accountability System (CCAS)

**2. DOD COMPONENT NAME:**

Defense Finance and Accounting Service

**3. PIA APPROVAL DATE:**

03/21/24

### 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.)

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public                            | <input checked="" type="checkbox"/> From Federal employees               |
| <input type="checkbox"/> from both members of the general public and Federal employees | <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.**

CCAS is a Fund Balance with Treasury (FBwT) reconciliation system used by Defense Finance and Accounting Service (DFAS) Columbus, Limestone, Japan, and Indianapolis. The system tracks vouchers reported to Treasury until posted in accounting systems & provides the basis for audit support of FBwT General Ledgers for the Air Force. CCAS is an internal control system that initiates comparison among various automated information sources that generates reports allowing accounting staff to research variances between systems. This allows correction of discrepancies between systems and provides a critical internal control. CCAS does not directly change any financial data but can trigger research that can lead to adjustments.

The following PII elements are collected: Social Security Number (SSN). In the document number field, CCAS may contain the first three characters of the last name and the entire SSN.

**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 PII is required to enable the Air Force and their authorized support personnel to complete root cause analysis on variances between systems, which may result in adjustments to correct discrepancies in the originating system in order to ensure the accuracy of Financial Statement balances.

**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.

CCAS does not collect PII directly from the individual. PII is received from the General Accounting and Finance System – Re-engineered (GAFS-R) and the Defense Cash Accountability System (DCAS). The files received from these systems occasionally contains PII in the document number field.

**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.

CCAS does not collect PII directly from the individual. PII is received from GAFS-R and DCAS. The files received from these systems occasionally contains PII in the document number field.

**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

**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.   
 Other DoD Components (i.e. Army, Navy, Air Force)      Specify.   
 Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)      Specify.   
 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

Of the sixteen data sources CCAS receives data from, only two contains PII. GAFS-R and DCAS files contain PII. PII is occasionally found in the document number field on the files.

**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)

Two data sources that possibly contain PII are collected by either:

- 1) Download directly from the data source
- 2) Download from a shared file location

**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.

Data is not retrieved by a unique identifier that contains PII.

**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.

GRS 1.1, Item 010

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

In accordance with Volume 1 and 2 of DFAS 5015.2-M: Cut off is at the end of the fiscal year and destroy 10 years after cutoff.  
Authorization: (General Records Scheduled (GRS) 1.1, Item 010).

**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 Financial Management Regulation 7000.14-R, Volume 5. Executive Order 9397 (as amended) authorized solicitation and use of SSNs as a numerical identifier for Federal personnel who are identified in most Federal record systems; Executive Order 12862, dated September 11, 1993.

**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.

CCAS does not collect PII directly from the individual.