

## 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:

Reasonable Accommodations (RA)

### 2. DOD COMPONENT NAME:

Defense Logistics Agency (DLA)

### 3. PIA APPROVAL DATE:

12/08/2025

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

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

- From Federal employees

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

- 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.**

ETK RA is an application that provides all DLA employees (using ETK RA e-file role) and applicant's Agency wide automation of RA request processing through a workflow-based system that automatically tracks events, creates notices, and sends emails that are encrypted to protect PII information. The system stores RA data, documents and records that contain PII (including medical documentation pending the request) in accordance with DLA Records Management policy and retention period (data retention), and produces reports. Records are used to generate statistical reports to evaluate/analyze the status, trends, and effectiveness of the EEO complaint process and Disability program in DLA. Reports generated do not contain personally identifiable 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)

The information collected is needed to perform HR support functions and is used for specific purposes associated with the ETK RA Management System. PII is necessary for processing an EEO RA. PII is used to properly identify the reasonable accommodation.

**e. Do individuals have the opportunity to object to the collection of their PII?**

Yes

(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.

Individuals have the opportunity to object to the collection of PII. All personal data collected is voluntarily provided by the requester. There are mandatory fields that are required to be completed in order to process the request in a complete manner. The Reasonable Accommodation Request form that collect the personal data that is captured by the system contains a Privacy Act Statement, as required by 5 U.S.C. 552a(e)(3), allowing the individual to make an informed decision about providing the data or participating in the program.

**f. Do individuals have the opportunity to consent to the specific uses of their PII?**

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 is needed by the application to ensure the ETK RA Management System record is properly associated with the correct individual. The PII information is needed as part of the Equal Employment Opportunity Commission's mandate to track information on Reasonable Accommodation Requests.

**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

This information is protected under the provisions of the Privacy Act of 1974. 29 CFR 1614.601 authorizes collection of this information. Although disclosure of the information is voluntary, failure to provide the information may impede the processing of the complaint action.

\*\*\*\*\* DLA 1887 (Confirmation of Request for Reasonable Accommodations) Privacy Act Statement \*\*\*\*\*

**AUTHORITY:** The Rehabilitation Act of 1973, as amended; 29 U.S.C. 791, Employment of Individuals with Disabilities; E.O. 13163, Increasing the Opportunity for Individuals with Disabilities to be Employed in the Federal Government; and E.O. 13164, Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodations.

**PURPOSE(S):** Information is being collected and maintained for the purpose of considering, deciding, and implementing requests for reasonable accommodation made by DLA employees and applicants with disabilities. Information is provided to DLA supervisors and managers about necessary restrictions on work or duties of the employee and about the necessary accommodations; and records will be used by DLA to track agency compliance with E.O. 13164 and U.S. Equal Employment Opportunity Commission (EEOC) guidance.

**ROUTINE USES:** To first aid and safety personnel, when appropriate; To Department of Labor for workers compensation claims; To Federal Government officials charged with the responsibility of investigating compliance with The Rehabilitation Act of 1973, as amended; To the U.S. Equal Employment Opportunity Commission (EEOC) for uses vested in the Commission; and to the Office of Personnel Management; the Merit System Protection Board; and/or Office of Special Counsel for other federally mandated reporting requirements. Information may be provided under any of the DoD "Blanket Routine Uses" <http://www.defenselink.mil/privacy/notices/blanket-uses.htm>.

**DISCLOSURE:** Voluntary; however, failure to provide this information may delay or impede your Reasonable Accommodation Request.

**RULES OF USE:** Do not for collection, retention, or use of information that is exempted from collection, retention, or use under the Privacy Act of 1974.

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

Shared

Within the DoD Component

Specify.

DLA General Counsel (DG); Equal Employment Opportunity (DO);

Shared

Other DoD Components

Specify.

Defense Security Cooperation Agency (DSCA), Defense Technical Information Center (DTIC), Space Development Agency (SDA);

Shared

Other Federal Agencies

Specify.

Equal Employment Opportunity Commission; Merit Systems Protections Board (MSPB); Office of Special Counsel (OSC); Washington Headquarters Services (WHS) EEO for conflict of interest cases; Other DoD Components or Military Services if an SES or Flag Officer is subject to an investigation and DLA has relevant records.

Not Shared

State and Local Agencies

Specify.

Shared

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.

Contractor: Information Technology Strategies LLC DBA IT-Strat (SP4709-17-D-0054 Task Order SP4709-21-F-0015 expiring 1/7/2024)  
FAR 52.224-1, Privacy Act Notification (Apr 1984)  
FAR 52.224-2, Privacy Act (Apr 1984)  
FAR 52.224-3, Privacy Training (Jan 2017)  
DFARS 252.239-7010, Cloud Computing Services (Oct 2016)

Not Shared

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

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

DLA Form 1887

- E-mail
- Face-to-Face Contact
- Fax
- Official Form (Enter Form Number(s) in the box below)
- Paper
- Telephone Interview
- Website/E-Form (Enter link(s) in box below.)

**k. Does this DoD Information system or electronic collection require a Privacy Act System of Records Notice (SORN)?**

Yes

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.

If "Yes," enter the SORN System Identifier

DoD-0007; S330.50 (Currently being updated)

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Officer 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 (DPCLD). Consult the DoD Component Privacy Officer 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.

1440.12 Reasonable Accommodation Case Files - GRS 2.3, Item 020 (DAA-GRS-2018-0002-0002)

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

(3) Retention Instructions.

Cutoff at end of Event. Destroy 3 years after employee separation from the agency or all appeals are concluded, 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.

The Rehabilitation Act of 1973, as amended; 29 U.S.C. 791, Employment of Individuals with Disabilities; E.O. 13163, Increasing the Opportunity for Individuals with Disabilities to be Employed in the Federal Government; and E.O. 13164, Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation.

**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.

- (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.