



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Debt Management System (aka Debt Collection System)

Defense Logistics Agency

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR Enter DITPR System Identification Number
- Yes, SIPRNET Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes
 - No
- If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes
- No

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office
Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

10 U.S.C. 133, Under Secretary of Defense for Acquisition and Technology; 40 U.S.C. 101 et seq., Federal Property and Administrative Services Act of 1949, as amended; 50 U.S.C. App. 2401 et seq., Export Control; 41 C.F.R. Part 101-45; and E.O. 9397 (SSN), as amended.

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The purpose of this system is to support DLA Disposition Services Public Sales Program Mission to identify individuals and/or companies who have defaulted on Sales Contracts of surplus property. If a bidder defaults or becomes indebted, the DLA Sales Contracting Officer notifies DLA Finance, Disposition Services and enters the individual and company names, addresses, contract numbers, principal balance, interest amount and any allocations of payments to interest and principal. It is used internally by DLA Finance, Disposition Services as a tracking mechanism for an indebted customers account by tracking file status, Bill of Collection Numbers and Balances. The official record (including any SSN or TIN information) is maintained at the Defense Finance and Accounting Service, Columbus, OH in the Contractor Debt System. DLA Disposition Services also maintains this system to speed up the good credit standing for bidders. Data from this internal application may also be used by DoD law enforcement agencies responsible for auditing and investigating or enforcing criminal, civil or administrative laws.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Like all systems that store names/addresses, there is a risk of identity theft. This risk is mitigated by the following: Access is limited to those DLA Disposition Services civilian and contractor personnel who use the records to perform official assigned duties. Technical controls are in place to restrict activity of users within the application; data owner verifies a need-to-know for each activity and assigns the candidate user to a group with authorization to perform specific actions.

Records are maintained in secure, limited access, or monitored work areas accessible only to authorized personnel. Central Processing Units are located in a physically controlled access area requiring either a badge or card swipe for entry. Workstations are controlled via Common Access Cards (CAC) with application specific generated forced password change protocols if the application itself is not CAC enabled. Passwords are tested for strength at the time of selection. Users are warned of the consequences of improperly accessing restricted databases and data misuse at each login, during staff meetings, and during separate Information Assurance and Privacy Act training. After hours, records are stored in locked file cabinets, locked rooms, or areas controlled by personnel screening. All file cabinets containing information subject to the Privacy Act of 1974 must have DLA Form 1461 affixed to the outside of the storage compartment. This form reads: The material/information contained herein falls within the purview of the Privacy Act of 1974 and will be safeguarded in accordance with the applicable systems of records notice and 32 CFR part 323.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

- Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

- Other (e.g., commercial providers, colleges).

Specify.

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

- Yes No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object.

Since Debt Management for DLA Disposition Services results from sales conducted, individuals would have to have registered for a sale, submitted bids (supplying their name and address information or they can't submit a bid) and been awarded property. The Debt Management System takes its information from the contract resulting from property award, so there is no way at this point that individuals can object.

j. 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.

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or becomes indebted, the DLA Sales Contracting Officer notifies DLA Finance, Disposition Services and enters the individual and company names, addresses, contract numbers, principal balance, interest amount and any allocations of payments to interest and principal. It is used internally by DLA Finance, Disposition Services as a tracking mechanism for an indebted customers account by tracking file status, Bill of Collection Numbers and Balances. The official record (including any SSN or TIN information) is maintained at the Defense Finance and Accounting Service, Columbus, OH in the Contractor Debt System. DLA Disposition Services also maintains this system to speed up the good credit standing for bidders. Data from this internal application may also be used by DoD law enforcement agencies responsible for auditing and investigating or enforcing criminal, civil or administrative laws.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- Privacy Act Statement Privacy Advisory
 Other None

Describe each applicable format.

Individual does not provide PII data directly to this information system.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.