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:
Customer Relationship Management (CRM)

2. DOD COMPONENT NAME:
Department of the Navy

3. PIA APPROVAL DATE:

4. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:
Customer Relationship Management (CRM)

Bureau of Naval Personnel Project Management Support (BUPERS-074)

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 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

CRM is an Oracle e-business suite application used to provide information and program support to Sailors and their families. The CRM agent asks for the member’s SSN which is used to access the member’s account that, prior to Sept 1st 2013, was created from Official Military information received from an automatic data feed from the Navy Personnel Database (NPDB). As of SEPT 1st 2013, CRM no longer receives an NPDB to create an account. New accounts are created only as needed when a service member contacts Navy Personnel Command (NPC) Contact Center to complete a transaction. Once the member’s account is accessed, customer service representatives can create and track Service Requests (SR) for various transactions between Navy Personnel Command (NPC) and the service member. Transactions include processing selection board packages for promotion, benefits eligibility questions, records requests, retirement points, distribution, career and assignment information and are noted with a brief statement of the transaction, disposition of the transaction and the date. Supporting documentation may be uploaded into the system in support of an open case, and is only accessible with a valid Department of Defense (DoD) Public Key Infrastructure (PKI) Common Access Card (CAC), unique user name, and 14 character password with specific permissions set as per System Authorization Access Request – Navy (SAAR-N) on file with Information Assurance Manager (IAM).

Privacy sensitive information IS NOT RELEASED by a Customer Service Agent DURING ANY TRANSACTION. Privacy sensitive information is listed at each agents workstation. All agents are eligible for a Secret Security Clearance. All Agents complete Annual PII Awareness training.

PII collected:

For new accounts after Sep. 1, 2013: Name, Social Security Number (SSN), Citizenship, Gender, Birth Date, Mailing/Home Address, Security Clearance, Military Records, Education Information.

Prior to Sept 1, 2013: automatic feed from NPDB included Name, SSN, Gender, Rate, Rank, Duty Station, Unit Identification Code (UIC), Homeport, Active Duty Service Date (ADSD), Projected Rotation Date (PRD), Primary Navy Enlisted Classification (PNEC), Secondary Navy Enlisted Classification (SNEC), Designator, Date of Rank, Phone, Date of Birth (DOB), Prospective Rate, Sea Shore Code, Expiration of Active Obligated Service (EAOS), Soft Expiration of Active Obligated Service (SEAOS), Distribution Navy Enlisted Classification (DNEC), Navy Office of Billet Classification (NOBC), Billet Sequence Code, Armed Forces Qualification Test (AFQT) Information, Education Code, Loss Code, Loss Date, Prospective UIC, Enlistment Date, Branch Class Code, NECs Earned, Pay Entry Base Date.

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)

Computer Matching and Administrative Use

e. Do individuals have the opportunity to object to the collection of their PII? [Yes] [No]

DD FORM 2930, JUN 2017
(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.

The individual may object to providing their SSN which is used to access CRM account information; however, many services cannot be provided without that information.

f. Do individuals have the opportunity to consent to the specific uses of their PII? [ ] Yes [x] 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.

Once PII is provided by the individual as stated above, consent has been given.

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.) [x] Privacy Act Statement [x] Privacy Advisory [ ] Not Applicable

Privacy Act Statement

AUTHORITY: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; Department of Defense Instructions DoDI 1336.08, Military Human Resource Records Life Cycle Management; DoDI 1336.05, Automated Extract of Active Duty Military Personnel Records; DoDI 7730.54, Reserve Components Common Personnel Data System (RCCPDS); Chief of Naval Operations Instructions OPNAVINST 1070.2 Series, Automated Extracts of Active Duty Military Personnel Records; and OPNAVINST 1001.19 Series, Reserve Components Common Personnel Data System (RCCPDS); and E.O. 9397 (SSN) as amended, and System of Records Notice (SORN): N07220-1, NM05000-2, N01080-1.

PURPOSE(S): To provide secure worldwide personnel and pay support for Navy members and their commands. To allow authorized Navy personnel and pay specialists to collect, process, modify, transmit, and store unclassified personnel and pay data.; To manage, supervise, and administer programs for all Department of the Navy civilian, military, and contractor personnel. Information is used to prepare recall rosters; track attendance at training; identify routine and special work assignments; determine clearance for access control; track manpower, grades, and personnel actions; track employment; and similar administrative uses requiring personnel data.; To assist in the administration, management, and supervision of Navy enlisted personnel and the operation of personnel affairs and functions. ROUTINE USES: To arbitrators and hearing examiners for the use in civilian personnel matters relating to civilian grievances and appeals. To authenticate authorization for access to services and spaces such as Morale, Welfare and Recreation (MWR) facilities and food services. In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974 as amended, and the DoD blanket Routine Uses.

DISCLOSURE: Voluntary. However, failure to provide the requested information may impact an individual's ability to initiate service requests resulting in loss of services.

More information on the SORNs may be found at the following links:
https://dpclid.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570401/n07220-1/
https://dpclid.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570436/nm05000-2/
https://dpclid.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570313/n01080-1/

Privacy Advisory:

NPC CRM agents use the following Privacy Advisory – “Your social security number is needed in order to access Privacy Act records and assist you. This information may be requested under Executive Order (E.O.) 9397, as amended, and acceptable use 11 as documented in DoD Instruction 1000.30. Providing your social security number is voluntary, however, failure to provide it may result in our inability to assist you. May I have your social security number?” This PA is given each time an agent needs to collect any PII from the customer.

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.

[ ] Other DoD Components Specify.

[ ] Other Federal Agencies Specify.

[ ] State and Local Agencies Specify.

Other PERS Codes (including but not limited to) PERS 1, 2, 3, 4, 5, 8 and 9) within Naval Personnel Command with "Need to Know" only; CRM Developers and System Administrators; Users with a valid DoD CAC, user name, and password have access to their own accounts.
### 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)
- **X** Individuals
- **X** Databases
- **X** Existing DoD Information Systems
- **X** Commercial Systems
- **X** Other Federal Information Systems

Prior to Sept. 1st 2013, CRM received an automatic weekly data feed from the Navy Personnel Database (NPDB) to create an account of the member's official military information. Privacy sensitive information IS NOT RELEASED by a Customer Service Agent DURING ANY TRANSACTION. CRM no longer receives an automatic feed from NPDB and new accounts are created during the transaction as required. The CRM agent asks the INDIVIDUAL for the member's SSN in order to access the member's account so that a Service Request (SR) can be created and tracked.

#### j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)
- **X** E-mail
- **X** Face-to-Face Contact
- **X** Fax
- **X** Telephone Interview
- **X** Website/E-Form

“Paper Form” would include packages received by US Mail from the Service Member as a part of a Selection Board promotion package. Paper forms are logged as received and hand delivered to the Promotion Board (PERS 8 and PERS 3) departments. PDF files may be uploaded into CRM as a part of a case. The attachments will eventually be moved to official records management system TRIM, and removed from CRM. Once paper document transactions are completed, the paper is destroyed by authorized shredding.

Email collection received via secure Navy Marine Corps Internet (NMCI) functional mail accounts that are only accessed by profiled agents as part of a security group maintained and monitored by NPC PERS 1 government staff. NPC CSC website advises our customers to ENCRYPT all email containing PII.

The use of FAX is not encouraged, but we do sometimes receive fax from customers with no other way to get us correspondence. DoD fax policy is displayed on our web pages.

#### 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.

- **X** Yes
- **X** No

If "Yes," enter SORN System Identifier **NM05000-2, N01080-1, N07220-1**

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or [http://dpclid.defense.gov/Privacy/SORNs/](http://dpclid.defense.gov/Privacy/SORNs/)

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.

#### 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. **N1-NU-86-1**

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

Destroyed in accordance with SSICs for specific general correspondence files included in Chapters 1 and 5, SECNAV M-5210.1. For general correspondence not covered by another SSIC, apply the following: retain on board until records are 2 years old. Earlier disposal is authorized if records are no longer needed for current operations.

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.

SORN NM05000-2, Program Management and Locater System (January 24, 2008, 73 FR 4193), authorities:
10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters Marine Corps
E.O. 9397 (SSN), as amended.

SORN N01080-1, Enlisted Master File Automated Systems (June 07, 2013, 78 FR 34354), authorities:
10 U.S.C. 5013, Secretary of the Navy; Department of Defense Instructions
DoDI 1336.08, Military Human Resource Records Life Cycle Management
DoDI 1336.05, Automated Extract of Active Duty Military Personnel Records
DoDI 7730.54, Reserve Components Common Personnel Data System (RCCPDS)
Chief of Naval Operations Instruction OPNAVINST 1070.2 Series, Automated Extracts of Active Duty Military Personnel Records
Chief of Naval Operations Instruction OPNAVINST 1001.19 Series, Reserve Components Common Personnel Data System (RCCPDS)
E.O. 9397 (SSN), as amended.

SORN N01080-2, Officer Master File Automated Systems (November 01, 2013, FR 65620) authorities:
10 U.S.C. 5013, Secretary of the Navy and E.O. 9379 (SSN), as amended.

10 U.S.C. 5013, Secretary of the Navy and E.O. 9379 (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.

CRM does not collect PII from members of the public.