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:
NAF Financial Management System (COMPUTRON)

2. DOD COMPONENT NAME:
Department of the Navy/United States Marine Corps

3. PIA APPROVAL DATE:

Marine Corps Manpower and Reserve Affairs (M&RA), Business and Support Services (MR)

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

Nonappropriated Fund Financial Management System (NAF FMS) Computron, is an integrated accounting system that provides a means to manage and administer records related to general ledger, accounts payable, fixed assets, accounts receivable, purchasing, inventory, financial transactions, and reporting in accordance with MCO 7010.19.

Personal information is maintained to support vendor payment transactions and reporting, insufficient funds by check tender data, outstanding debts owed, Information Returns (form 1099) for applicable contract payments and prizes, employee reimbursements, and final wages payable to the employee's beneficiary in the event of an employee's death.

Types of personal information maintained for financial transactions include: Name, DoD ID Number, Financial Information, Home/Cell Phone, Mailing/Home Address, Official Duty Address, Official Duty Telephone Number, Other ID Number, Personal Email Address, Rank/Grade, Social Security Number, Work Email Address, Other.

Financial information includes: payment history and accounts receivable, banking institution name, account number, and routing number. Other ID numbers include MCCS employee ID, E.I.N., and vendor ID. Other includes military status, military branch, and balance due remaining from insufficient funds.

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)

PII is collected for: data matching among systems; identification and verification of the individual and their contact information, employee reimbursement, final wages payable to the employee's beneficiary, and vendor eligibility to conduct business with MCCS; and verification of amount owed for insufficient funds.

The intended use of the PII collected is for mission-related use and administrative use.

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.
NAF FMS (Computron) is not the original source of requesting personal information from the individual.

At the original source of PII collection:
- Vendors may decline to provide PII; however, failure to provide the information may result in ineligibility to conduct business with MCCS.
- Patrons may decline to provide PII at their point of sale; however, failure to provide the required information may result in ineligibility to purchase merchandise by check tender.
- Employee information for reimbursement and beneficiary assignment is obtained during the application/hiring process. Providing information is voluntary; however, failure to provide required information may result in ineligibility for employment, related benefits, and participation in related activities.

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

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

(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.

NAF FMS (Computron) is not the original source for requesting personal information from the individual. Providing personal information at the source is considered consent.

g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided.  

<table>
<thead>
<tr>
<th>Privacy Act Statement</th>
<th>Privacy Advisory</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

NAF FMS (Computron) is not the original source of requesting personal information from the individual.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component?  

<table>
<thead>
<tr>
<th>Specify.</th>
<th>Business Intelligence (Cognos)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specify.</td>
<td>Defense Finance and Accounting Services (DFAS) and Army &amp; Air Force Exchange Service (AAFES)</td>
</tr>
<tr>
<td>Specify.</td>
<td>Internal Revenue Service (IRS)</td>
</tr>
<tr>
<td>Specify.</td>
<td>COMPUTRON is a NAF system. Contractor support is via purchase order and any purchase order will include Privacy clauses comparable to that found in the FAR.</td>
</tr>
<tr>
<td>Specify.</td>
<td>Bank of America Merchant Services and Check Verification System (CVS)</td>
</tr>
</tbody>
</table>

i. Source of the PII collected is:  

<table>
<thead>
<tr>
<th>Specify.</th>
<th>Databases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specify.</td>
<td>Commercial Systems</td>
</tr>
</tbody>
</table>

Commercial systems include Bank of America Merchant Services.
Existing DoD information systems is DFAS and AAFES.
Databases include records of outstanding indebtedness to MCCS submitted from Marine Corps installations.
### j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- [x] E-mail
- [ ] Face-to-Face Contact
- [ ] Fax
- [x] Information Sharing - System to System
- [x] Other (If Other, enter the information in the box below)

**Official Form (Enter Form Number(s) in the box below)**
- [x] Paper
- [x] Telephone Interview

System-to-system transfer is via a secure file gateway connection. Other is new vendor maintenance workflow module.

Official forms include DD 139, "Pay Adjustment Authorization;" W-9, "Request for Taxpayer Identification Number and Certification;" and W2-G, "Certain Gambling Winnings."

### 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
- [ ] No

If "Yes," enter SORN System Identifier **NM01700-1, NM04060-1, NM07010-1, N**

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

NAF FMS (Computron) is a comprehensive financial management IT system that does not request personal information directly from the individual. System of Record Notices reside with the original sources of the PII collection. Draft SORN for "Marine Corps Community Services (MCCS) Bad Checks and Indebtedness" is pending review and approval.

### 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. **DAA-0127-2013-0015**

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

3. Retention Instructions.

Temporary. Destroy 6 years and 3 months after period covered by account (Records schedule number DAA-0127-2013-0015). Records contained in this IT system are currently not destroyed. Aptean, the Computron manufacturer/owner, does not provide a means to destroy or permanently remove data from the system without affecting the integrity of the software system. MCCS is pursuing a new financial management system that will be compliant with the DON privacy program requirements. Scheduled replacement is anticipated to be in 2019.

### 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.

   (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.

**NM01700-1, DON General Morale, Welfare, and Recreation Records**

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.

NAF FMS (Computron) is a comprehensive financial management IT system that does not request personal information directly from the individual. OMB requirements reside with the original source of the PII request. Representatives for SORN N04066-4 are currently updating the SORN and submitting for OMB control numbers, as applicable.