# 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:

NAVY RESERVE ORDER WRITING SYSTEM (NROWS)

## 2. DOD COMPONENT NAME:

Department of the Navy

## 3. PIA APPROVAL DATE:

03/25/20

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The PII is: (Check one. Note: foreign nationals are included in general public.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>From members of the general public</td>
<td></td>
<td></td>
</tr>
<tr>
<td>From both members of the general public and Federal employees and/or Federal contractors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>From Federal employees and/or Federal contractors</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Not Collected (if checked proceed to Section 4)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. The PII is in a: (Check one)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New DoD Information System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Existing DoD Information System</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Significantly Modified DoD Information System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

NROWS is the single, enterprise-wide application for putting a reservist on Annual Training (AT), Active Duty Training (ADT), and Inactive Duty Training Travel (IDTT) orders. The development of NROWS was to address significant business process changes, eliminate legacy systems, and reduce total cost of ownership. It is a web-based system that incorporates the orders application process with an automated approval workflow, Reserve Personnel Navy (RPN) budgeting and approval, the delivery of official orders, and travel itineraries. This system produces around 150,000 sets of training orders annually and is used by approximately 90,000 users to support every major claimant.

PIA Data Collected:
- Citizenship, Home/Cell Phone, Mailing/Home Address, Official Duty Address, Race/Ethnicity, Work E-mail address, Birth Date, Marital Status, Personal E-mail address, Rank/Grade, Security Information, DoD ID Number, Gender/Gender Identification, Medical Information, Name(s), Social Security Number (SSN Full)

<table>
<thead>
<tr>
<th>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)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identification of personnel.</td>
</tr>
<tr>
<td>e. Do individuals have the opportunity to object to the collection of their PII?</td>
</tr>
<tr>
<td>(1) If &quot;Yes,&quot; describe the method by which individuals can object to the collection of PII.</td>
</tr>
<tr>
<td>(2) If &quot;No,&quot; state the reason why individuals cannot object to the collection of PII.</td>
</tr>
<tr>
<td>PII is not collected from the individual.</td>
</tr>
<tr>
<td>f. Do individuals have the opportunity to consent to the specific uses of their PII?</td>
</tr>
<tr>
<td>(1) If &quot;Yes,&quot; describe the method by which individuals can give or withhold their consent.</td>
</tr>
<tr>
<td>(2) If &quot;No,&quot; state the reason why individuals cannot give or withhold their consent.</td>
</tr>
<tr>
<td>PII is not collected from the individual.</td>
</tr>
</tbody>
</table>
g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided. (Check appropriate and provide the actual wording.)

| Privacy Act Statement | Privacy Advisory | Not Applicable |

PII is not collected from the individual.

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

- **X** Within the DoD Component

  Commander Navy Reserve Forces Command (CNRFC) with a need to know (i.e., those entering and retrieving records and commanders, verifying and approving the orders for Fleet Support).

  DTS - requires PII for booking of travel for reservists

  One Pay - requires PII in order to pay the centrally billed account for SATO-direct orders

  ICATS - requires PII to unique identify reservists for real time alert purposes (such as how to determine what reservists may be in harms way)

- Specify.

- Other DoD Components

- Specify.

- Other Federal Agencies

- 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.)

- **X** Optimal Solutions and Technologies, Inc. develops and supports portions of NROWS.

  "The Contractor shall comply with the DON Privacy program per SECNAVINST 5211.5E.

  The Contractor shall ensure all categories of sensitive information, including Personally Identifiable Information (PII), are secured and in compliance with all IA Controls from the NIST 800-53(REV4).

  Compliance includes the encryption of “data in transit” and “data at rest” as required by the data owner.

  The Contractor shall comply with DON CIO MSG DTG 171952Z APR 07 to ensure that all Personally Identifiable Information (PII) is properly safeguarded. The requirement under the E-Government Act of 2002, mandates that all PII be protected. In addition, systems processing PII must have completed a Privacy Impact Assessment (PIA) and register that PIA with DON CIO.

  Contract Section: The Contractor must control personnel access to DoD and DON data by ensuring all CSP employees who have access to government data, architecture that supports government data, or any physical or logical devices/code shall be a U.S. person per Executive Order 12333 and pass an appropriate background check as required by Homeland Security Presidential Directive -12.

  The contractor confirmed this requirement is supported.

  The contractor clauses:

  52.224-1 Privacy Act Notification

  52.224-2 Privacy Act

  52.204-21Basic Safeguarding of Covered Contractor Information Systems are in the contract.
Other (e.g., commercial providers, colleges).

Scheduled Airline Ticket Office (SATO) Sterling – The NROWS system sends Navy personnel commercial transportation requests to the SATO Sterling travel system via an SSH connection. The NROWS Interface server retrieves Navy personnel commercial transportation reservation confirmations from the SATO Sterling (Sterling, VA) server via a SFTP connection.

SATO Denver – The NROWS Interface server retrieves Navy personnel commercial airline ticket information with costs and credit card bill information from the SATO Denver server via a SFTP connection.

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
- Other Federal Information Systems

All information is obtained through authorized system interfaces within DoN. PII is not collected from the individual.

Other systems are:

Navy Standard Integrated System (NSIPS) - The NROWS system retrieves Personnel Data and RUIC information and sends order data to the NSIPS system via an SSH connection.

Medical Readiness Reporting System (MRRS) – The NROWS system retrieves Qualification Flags for Medical and Dental data via a database link using SQLNet.

ADE 2.0 (aka NTMPS) - The NROWS system retrieves DoD ID for reservist records received from NSIPS

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

- E-mail
- Face-to-Face Contact
- Fax
- Information Sharing - System to System
- Official Form (Enter Form Number(s) in the box below)
- Paper
- Telephone Interview
- Website/E-Form
- Other (If Other, enter the information in the box below)

Interfaces are setup to pull data into NROWS (other systems listed in sections "h" and "i")

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: N01571-1, N07220-1

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.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.

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) NARA Job Number or General Records Schedule Authority.  DAA-NU-2015-0001-003

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

(3) Retention Instructions.

TEMPORARY: Cutoff at CY. Destroy when 3 years old.

SSIC: 1300.3 - Record Schedule: 1000-38

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 N01571-1, Reserve Financial Management/Training System (RESFMS) (February 22, 1993, 58 FR 10718), authorities:
5 U.S.C. 301, Departmental Regulations  
E.O. 9397 (SSN), as amended.

SORN N07220-1, Navy Standard Integrated Personnel System (NSIPS) (November 29, 2012, 77 FR 71185), authorities:
10 U.S.C. 5013, Secretary of the Navy and E.O. 9397 (SSN), as amended.

Other authorities:
10 U.S.C. 5013, Secretary of the Navy  
10 U.S.C. 5041, Headquarters, Marine Corps  
BUMED Note 6110, Tracking and Reporting Individual Medical Readiness Data  
SECNAVINST 6120.3, Secretary of the Navy Periodic Health Assessment for Individual Medical Readiness  
10 U.S.C. 671, Members not to be assigned outside United States before completing training  
DoD 6025.18-R, DoD Health Information Privacy Regulation  
COMNAVRESFORCOM INSTRUCTION 4650.1, ORDER PROCESSING AND TRANSPORTATION ARRANGEMENTS FOR NAVY RESERVE SAILORS

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.

System does not collect on the public.