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:
Navy Bureau of Naval Personnel (BUPERS) 03/27/20

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

- CRM is a system utilizing Navy Salesforce implementation which is used to provide information and program support to Sailors and their families. The OMNI Channel system collects the member’s DoD-ID or SSN, which is transferred to the CRM system and used to access the member’s account. PII is collected from two primary sources: OMNI Channel is the telephony system used to receive customer requests via phone and all personnel transactions and transactions affecting pay are received via encrypted email from command Pay and Personnel Administrators (CPPAs). New accounts are created only as needed when a customer contacts the My Navy Career Center (MNCC) Operations Center (MOC) to request service. Data used to create new accounts is provided by the Authoritative Data Environment (ADE). If a customer does not have a record within ADE, the Customer Service Representative (CSR) will create an account manually, and may ask for additional PII necessary to create the account. Once the member’s account is accessed, MNCC agents can create and track Service Requests (SR) for various transactions between the MOC, Navy Personnel Command (NPC), other tier 2 Navy organizations, and the customer. 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 SR, and is only accessible with a valid Department of Defense (DoD) Public Key Infrastructure (PKI) Common Access Card (CAC), 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 an agent during any SR communications. Privacy sensitive information is listed at each CSR workstation. All CSRs are eligible for a Secret Security Clearance. All CSRs complete Annual PII Awareness training.

PII collected:
If customer record resides in CRM, the agent validates the member's identity using DoD-ID/SSN. In this case, PII is provided to CRM via the ADE interface. CRM also receives PII from the OMNI Channel system which IS USED TO ASSIST THE CUSTOMER AND FOR training and potential complaints.

If a customer does not reside in CRM and is not in the ADE, then the agent collects the minimum amount of PII required to create a customer record: Name, DOD-ID or Social Security Number (SSN), citizenship, gender, birth date, mailing/home address, security clearance, military records, education information.

If a customer declines to provide DOD-ID or SSN, it is possible to create a customer record, however difficult to assist the customer for specific personnel issues.

PII collected via email from CPPA's includes all personnel related transactions as well as transactions affecting pay: Citizenship, passport information, date of birth, place of birth, records, disability information, financial information, law enforcement information, position/title, security information, child information, emergency contact, legal status, photo and religious preference.
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

(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 or DOD-ID 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 ☑ 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 is assumed.

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 ☐ Privacy Advisory ☐ Not Applicable

A Privacy Act Statement is included on each form used to collect PII.

NPC agents use the following Privacy Advisory FOR INCOMING CALLS – "The information requested is authorized for collection under Executive Order (E.O.) 9397, as amended, and System of Records Notice T5040. Calls will be recorded in order to resolve misunderstandings or misperceptions made during the conversation and for training purposes. In addition to the applicable standard Routine Uses associated with SORN T5040, this information will be used by representatives to access your Privacy Act records for customer service purposes. Disclosure of requested information is voluntary, however failure to provide the requested information may impact our ability to assist you."

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

☐ Other DoD Components

☐ Other Federal Agencies

☐ State and Local Agencies

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.

Strategic Data Systems (SDS) is contracted for the call center agents and staff. All contractors sign a non-disclosure agreement (NDA) and complete annual PII training. The privacy FAR clauses have been confirmed to be in the contract.

☐ Other (e.g., commercial providers, colleges).
i. **Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

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<td>X</td>
<td>Individuals</td>
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<td>X</td>
<td>Existing DoD Information Systems</td>
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<td>Databases</td>
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<td>Commercial Systems</td>
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<td>Other Federal Information Systems</td>
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Primary source of PII stored in CRM is imported from the ADE. Additionally, MyNavy Portal (MNP) interfaces directly with CRM to automatically create service requests which may include PII. This PII is used by agents to route or complete service requests including Enlisted Personnel Action Requests (ePAR) and MyRecord requests for update. Service requests are initiated directly by the customer within MNP.

Recorded phone conversations are also captured in the CRM system.

SECURE EMAIL IS USED TO SUBMIT PAY AND PERSONNEL TRANSACTIONS TO CRM.

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

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<td>E-mail</td>
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<td>Official Form (Enter Form Number(s) in the box below)</td>
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<td>X</td>
<td>Face-to-Face Contact</td>
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<td>Paper</td>
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<td>Telephone Interview</td>
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<td>X</td>
<td>Information Sharing - System to System</td>
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<td>Website/E-Form</td>
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<td>Other (If Other, enter the information in the box below)</td>
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Authoritative Data Environment (ADE)
MyNavy Portal (MNP)

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  

N01080-1, N01080-2, NM05000-2, N072

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.

File under SSIC 1000-34. Files are TEMPORARY. Cutoff at CY and destroy 3 years after cutoff.
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.

   (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 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. |

| SORN NM05000-2, Program Management and Locator 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 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. |

| SORN T5040, Call Recording Application Records (March 24, 2009, 74 FR 12320), authorities: |
| 5 U.S.C. Section 301, Departmental Regulations; EO 12862 (Customer Service); and EO 9397 social Security Number (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.

OMB Control Number package was submitted on 18 February 2020.