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:
Optical Digital Imaging-Records Management System (ODI-RMS)

2. DOD COMPONENT NAME:
Department of the Navy

3. PIA APPROVAL DATE:
06/02/20

United States Marine Corps

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

☐ New Electronic Collection

☒ Existing DoD Information System

☐ Existing Electronic Collection

☐ Significantly Modified DoD Information System

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.

Optical Digital Imaging-Records Management System (ODI-RMS), along with the Digital Board Room (DBR) application and Performance Evaluation System (PES), is utilized to manage Official Military Personnel Files (OMPFs) for the United States Marine Corps (USMC). The primary purpose of ODI-RMS is to support the centralized selection, promotion, retention, and assignment of Marines.

The type of personal information about a Marine collected in ODI-RMS includes: Rank, Social Security Number (SSN), Military Occupational Specialty (MOS), gender, religion, dependent names and addresses, enlistment and commissioning data, Fitness Reports to include commendatory and derogatory performance data, educational data, financial pay, benefits, and allotment information; home of record, address and next of kin data; current, past, and future unit information; legal information to include courts martial, non-judicial punishment, counselling and reprimands.

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)

HQMC has mandated that the primary purpose of ODI-RMS is to support the centralized selection, promotion, retention, and assignments of Marines. ODI-RMS supports both the Active Duty and Reserve Components of the Marine Corps. In order to accomplish this, ODI-RMS must have access to PII for identification purposes. HQMC selection boards requires a documented history of individual performance to identify selection, promotion, and retention of the most qualified Marines of the Active and Reserve components of the Marine Corps.

PII is used within ODI-RMS for administrative purposes to evaluate a Marines performance through the various data collected on the FITREPs, the process of selecting and assigning the most qualified Marines for promotion and duty assignment fill the requirement to fill billet vacancies through a specific grade structure throughout the Marine Corps aids in mission accomplishment.

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.

PII is not collected directly from the individual.

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.

PII is not collected directly from the individual.
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

PII is not collected directly 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)

- Within the DoD Component
- Other DoD Components
- Other Federal Agencies
- State and Local Agencies

PII will be shared with the following systems and their users/owners.

- System: Official Military Personnel Files (OMPFs) Online
  System Owner: USMC M&RA

- System: Defense Personnel Records Information System (DPRIS)
  System Owner: Personnel and Readiness Information Management Office (PR&IM) Office of Under Secretary of Defense for Personnel Readiness (OUSD)

- System: Electronic Military Records System (eMilRec)
  System Owner: National Personnel Records Center (NPRC)

SAIC is subject to the following clauses relating to security of information (government and personal):

52.204-2 Security Requirements
52.204-9 Personal Identity Verification of Contractor Personnel
52.224-1 Privacy Act Notification
52.224-2 Privacy Act
52.239-1 Privacy or Security Safeguards
252.204-7012 Safeguarding of unclassified controlled technical information
252.225-7039 Contractors Performing Private Security Functions
252.227-7025 Limitations on the Use or Disclosure of Government-Furnished Information Marked with Restrictive Legends

Specific language in the contract is described as:

Security measures shall be taken to satisfy the security requirements in accordance with the Marine Corps System Security Plan. ODI-RMS data/information shall be protected from an Information Systems Security (INFOSEC) perspective. The contractor shall apply security considerations to software design and management.

Only contractors who have a valid need to know and a favorably adjudicated background investigation are permitted to have access to ODI-RMS. During the course of routine system maintenance, contractors may be exposed to PII. Users are DoD employees or authorized contractors supporting the DoD.

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

Retired Marines and family members who request OMPFs.
Other Federal Information Systems

Defense Personnel Records Information System (DPRIS)
Operational Data Store Enterprise (ODSE)
Automated Performance Evaluation System (APES)
Total Force Administration System (TFAS)

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
- □ Information Sharing - System to System
- X Other (If Other, enter the information in the box below)

Each IPAC has a scanner interfaced to ODI-RMS for input of personnel related documentation.

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  M01040-3

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.

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) NARA Job Number or General Records Schedule Authority.

DAA-NU-2015-0001-0002

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

(3) Retention Instructions.

Record Schedule 1000-2. PERMANENT: Cutoff upon separation of service member. Transfer to the National Archives 62 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. (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 M01040-3, Marine Corps Manpower Management Information System Records (April 29, 2010, 75 FR 22570), authorities:
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.

Data is not collected from the public.