

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:

Talent Management System (TMS)

2. DOD COMPONENT NAME:

Department of the Navy

3. PIA APPROVAL DATE:

08/24/20

NAVWAR - PEO MLB PMW 250

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.

The Talent Management System (TMS) Pilot is a risk reduction initiative to assess the commercial talent management capabilities in terms of business process applicability and operational impacts, as well as business, technical, and cyber risks and benefits. PEO MLB, PMW 250 has been assigned to carry out this initiative, evaluate and report results, and make recommendations on future actions to the Department of Navy, Director of Acquisition Talent Management (DATM).

TMS is a SAPNS2 SuccessFactors Software as a Service (SaaS) Cloud Model leveraging Amazon Web Services (AWS) Infrastructure as a Service (IaaS), hosting the SAP Human Capital Management (HCM) Suite of FedRAMP accredited applications.

The system is used to manage and administer the DON Talent Management needs and to provide a means through which employees (civilian and military) may identify, manage, and complete career and individual development planning requirements on a timely basis. Information is used to manage and administer career development, individual development plans, and mentoring programs; to identify individual training needs and progress; to screen and select candidates for job positions and needed training to meet gaps; for reporting and financial forecasting, career tracking, monitoring, assessing, and position gap reconciliation purposes. Statistical data are used to compare position openings, to project positions that will open and to project training needs and position needs (gaps) across DON organizations and to include different and emerging types of employees roles for an evolving workforce.

PII collected includes: Name, DoD ID number, Security Information, Pay Plan and Grade/Rank/Appointment/Agency/Position/Title/Billet Information, Service Computation/Retirement Eligibility Information, Supervisor Information, Official Duty Telephone Number, Work Email Address, Race/Ethnicity, Official Duty Address, Military Records, Employment Information, Academic Information, Career Information.

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)

Verification

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 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 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 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

Specify.

Navy Echelon I and II Commands and activities throughout the Department of the Navy required to report on Talent Management and Career Development: OPNAV, SECNAV, NAVSEA, NAVWAR PEO EIS, NAVWAR HQ

Other DoD Components

Specify.

Department of the Navy Civilian Authoritative Data Source (DONCADS / HRLINK), Defense Acquisition University (DAU)

Other Federal Agencies

Specify.

State and Local Agencies

Specify.

CARAHSOFT TECHNOLOGY CORP. Contract / Purchase Order Agreement GS-35F-0119Y, Delivery Order N0003919F0062

Contract Section H-8.4 The Contractor must comply with requirements of the Privacy Act when applicable, to include assessment requirements, the e-Government Act and Personally Identifiable Information (PII) as defined in OMB Memo 07-16, and requirements for handling Controlled Unclassified Information (i.e., any information that is exempt from release under the Freedom of Information Act).

All PMW 250 contracts contain the following language:

"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 DoDI 8500.2, specifically IA Controls DCFA-1 and DCSR-2. 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 H-8.19 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

52.204-21 Basic Safeguarding of Covered Contractor Information Systems are in the contract.

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)



Individuals



Databases



Existing DoD Information Systems



Commercial Systems



Other Federal Information Systems

Information is obtained through authorized system interfaces within the DoN and DoD applications. Specifically: Department of the Navy Civilian Authoritative Data Source (DONCADS / HRLINK) Defense Acquisition University (DAU)

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



E-mail



Official Form (Enter Form Number(s) in the box below)

- | | |
|---|--|
| <input type="checkbox"/> Face-to-Face Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

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

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

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

(3) Retention Instructions.

TMS is currently undergoing a pilot phase and reviewing the current requirements to complete record retention TMS will update the section during full authorization.

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 DMDC 02 DOD, Defense Enrollment Eligibility Reporting Systems (DEERS) (July 27, 2016, 81 FR 49210), authorities:

5 U.S.C. App. 3, Inspector General Act of 1978; 5 U.S.C. Chapter 90, Long-Term Care Insurance; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. Chapter 53, Miscellaneous Rights and Benefits; 10 U.S.C. Chapter 54, Commissary and Exchange Benefits; 10 U.S.C. Chapter 58, Benefits and Services for Members being Separated or Recently Separated; 10 U.S.C. Chapter 75, Deceased Personnel; 10 U.S.C. 2358, Research and Development Projects; 10 U.S.C. Chapter 49 Section 987, Terms of Consumer Credit Extended to Members and Dependents: Limitations; 20 U.S.C. 1070a (f)(4), Higher Education Opportunity Act; 31 U.S.C. 3512(c), Executive Agency Accounting and Other Financial Management Reports and Plans; 42 U.S.C. 18001 note, Patient Protection and Affordable Care Act (Pub. L. 111-148); 52 U.S.C. 20301, Federal Responsibilities; 50 U.S.C. Chapter 23, Internal Security; 50 U.S.C. 501, Servicemembers Civil Relief Act; 38 CFR part 9.20, Traumatic injury protection; 38 U.S.C. Chapter 19, Subchapter III, Service members' Group Life Insurance; DoD Directive 1000.04, Federal Voting Assistance Program (FVAP); DoD Directive 1000.25, DoD Personnel

Identity Protection (PIP) Program; DoD Instruction 1015.09, Professional U.S. Scouting Organization Operations at U.S. Military Installations Overseas; DoD Instruction 1100.13, DoD Surveys; DoD Instruction 1241.03, TRICARE Retired Reserve (TRR) Program; DoD Instruction 1241.04, TRICARE Reserve Select (TRS) Program; DoD Instruction 1336.05, Automated Extract of Active Duty Military Personnel Records; DoD Instruction 1341.2, Defense Enrollment Eligibility Reporting System (DEERS) Procedures; DoD Instruction 3001.02, Personnel Accountability in Conjunction with Natural or Manmade Disasters; Homeland Security Presidential Directive 12, Policy for a Common Identification Standard for Federal Employees and Contractors; DoD Instruction 7730.54, Reserve Components Common Personnel Data System (RCCPDS); and E.O. 9397 (SSN), as amended.

SORN OPM/GOVT-1, General Personnel Records (December 11, 2012, 77 FR 79694) authorities:

55 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.

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.

TMS does not collect data from the public.