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 "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:
Command Financial Management System - Consolidated (CFMS-C)

2. DOD COMPONENT NAME:  Department of the Navy

3. PIA APPROVAL DATE: 10/20/20

DON AA

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 [X] 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
- [x] Existing DoD Information System
- [ ] Significantly Modified DoD Information System
- [ ] New Electronic Collection
- [ ] Existing Electronic Collection

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.

CFMS-C is a comprehensive financial management system that provides funds administration, budget formulation and financial reporting capabilities to multiple USN BSOs and their lower echelon activities. At no time can information be retrieved by name or other unique identifier such as SSN; no such query interface is provided.

Previously the Commander Navy Installations Command (CNIC) Budget Submitting Office (BSO) used STARS as the General Ledger accounting system and the civilian labor budget formulation and analysis process required the combination of select Total Workforce Management System (TWMS) and Standard Accounting and Reporting System - Field Level (STARS-FL) data to produce CFMS-C accelerated labor data. The TWMS ID replaced the social security number, minimizing risk. Now that CNIC uses Standard Accounting, Budgeting, and Reporting System (SABRS) as the General Ledger accounting system, this process is no longer in place. The PII data from both the SABRS interface and the STARS-FL interface is removed by the source system and the data is no longer transmitted into CFMS-C. Prior data within CFMS-C for historical reference still contains data identified only by TWMS ID, with no references to SSN. BSO N00052 (CNIC) started sending data to SABRS in FY17 and no longer receives STARS labor data, making it no longer necessary to pull and update TWMS data and/or swap out any PII from STARS as the PII data from STARS is no longer sent or loaded via the interface.

PII previously collected and stored in CFMS-C is protected and for historical purposes includes: Name, TWMS ID number, and Employment Information.

Additional PII information is collected from the SABRS interface and is solely to record obligations for labor costs. This information stored in CFMS-C from the SABRS system and cannot be retrieved using a personal identifier. CFMS-C masks the PII data in all reports and it is only accessible to personnel with privileged access to labor reporting and research.

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 collected is for data-matching and administrative use in order to research and report on labor obligations accurately.

e. Do individuals have the opportunity to object to the collection of their PII?  [X] 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.
f. Do individuals have the opportunity to consent to the specific uses of their PII? [ ] Yes [x] 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.

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 [x] Not Applicable

Individuals do not provide PII.

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.

[ ] 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.) Specify.

[x] Other (e.g., commercial providers, colleges) Specify.

PII is no longer received from any interfacing partners and no PII data will be shared through data exchange to anyone either within DON or outside DON.

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

PII is no longer being transmitted from interfacing partners and stored in CFMS-C.

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)

[ ] Face-to-Face Contact [ ] Paper

[ ] Fax [ ] Telephone Interview

[ ] Information Sharing - System to System [ ] Website/E-Form

[x] Other (If Other, enter the information in the box below)

PII is no longer being collected or entered into CFMS-C.

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. PII and Privacy Act SORN information must be consistent.

[ ] Yes [x] No

If "Yes," enter SORN System Identifier

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.

CFMS-C does not collect the PII from the user. CFMS-C stores the PII but does not collect it. The PII is not retrieved in CFMS-C by a personal identifier.

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-2015-0007-001]

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

(3) Retention Instructions.

Cutoff Instruction: Cutoff at end of fiscal year. Retention Period: Destroy 7 year(s) 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 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.

10 U.S.C. 5013, Secretary of the Navy
10 U.S.C. 5041, Headquarters, Marine Corps
31 U.S.C. 1108, Preparation and Submission of Appropriations Requests To The President
7000.14-R, DoD Financial Management Regulation
NAVSO P-1000, DoN Budget Manual.

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.

PII is not collected directly from the individual.