PRIVACY IMPACT ASSESSMENT (PIA)

For the

Corporate Electronic Document Management System (CEDMS) for Defense Finance and Accounting Service
Defense Logistics Agency

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

☐ (1) Yes, from members of the general public.

☐ (2) Yes, from Federal personnel* and/or Federal contractors.

☒ (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.

☐ (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

☐	**New DoD Information System**	☐	**New Electronic Collection**
☒	**Existing DoD Information System**	☐	**Existing Electronic Collection**
☐	**Significantly Modified DoD Information System**		

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

☒	**Yes, DITPR**	Enter DITPR System Identification Number	15849
☐	**Yes, SIPRNET**	Enter SIPRNET Identification Number	
☐	**No**		

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

☒ **Yes** ☐ **No**

If "Yes," enter UPI 007-97-01-01-02-0158-00 (EC/EDI)

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

☒ **Yes** ☐ **No**

If "Yes," enter Privacy Act SORN Identifier T7300C, Corporate Electronic Document Management System

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: http://www.defenselink.mil/privacy/notices/

or

Date of submission for approval to Defense Privacy Office
Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an 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**

Enter OMB Control Number | DFAS, Services, and DoD Agencies maintain OMB control numbers

Enter Expiration Date |

☒ **No**

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

5 U.S.C. 301, Departmental Regulations; 31 U.S.C. Sections 3325, 3511, 3512, 3513; DoD Financial Management Regulation 7000.14R and E.O.9397 (SSN).

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

CEDMS has been referred to as "a web-based electronic file room." The system is an archival repository for specific Defense Finance And Accounting Service (DFAS) documents after financial processing has been completed by the relevant DoD organizations. CEDMS provides document management, recordkeeping, record retrieval, record staging, and document security for management (i.e., scanning and indexing) of various types of hard copy source documents to include vouchers (e.g., schedules of withdrawals & credits, vouchers for transfer between appropriations and/or funds, journal and cash collection vouchers, military pay vouchers, public vouchers for refund and debit vouchers) and disbursements (e.g., statement of accountability, schedule of canceled or undelivered checks). When information is needed from CEDMS, either the DFAS CEDMS office provides the information to the agency or the respective agency may retrieve their own information by submitting a written request on agency letterhead including a systems access form (DD 2875) for designated person to access the information.

PII stored may include name of payee, SSN, employment title/rank, phone number, bank account information, collection information such as delinquency notices issued by DFAS. Through the use of Optical Recognition Character (OCR) capability, users can query PII information if it is 'typed text.'

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

The result of mishandling financial personal data may lead to lost, stolen or compromised PII which could be harmful to the individual in many ways (e.g., identify theft, damage to the individual's reputation and /or financial hardship). These risks are mitigated through a combination of administrative, physical, and technical controls.
-Administrative: Access to personal information is limited to those individuals who require the records to perform their official assigned duties. Application users are granted roles and access by system administrators based on their assigned duties by site and by document type needed.
-Physical: Records are maintained in secured limited access or monitored areas. Physical entry by unauthorized persons is restricted through the use of locks, guards, passwords, or other administrative procedures.
-Technical: In order to get connected to the login screen, the end-user must provide valid CAC credentials. Once the end-user has been verified Single Sign-On is utilized.
Application users are only allowed to access CEDMS via web on secure socket layer (SSL), end users have no access to the operating system or any other resources related to the O/S.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

☒ **Within the DoD Component.**

Specify. PII will only be shared with DLA Document Service Administrators with a need to know.

☒ **Other DoD Components.**

Specify. Defense Finance and Accounting, Military Services, and Defense Agencies

☒ **Other Federal Agencies.**

Specify. Department of Justice, Social Security Administration, National Finance Center (USDA), Office of Thrift Savings Plan, Department of Energy, Health and Human Services, Environmental Protection Agency, Broadcasting Board of Governors, and the Executive Offices of the President.

☐ **State and Local Agencies.**

Specify.

☐ **Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

☐ **Other** (e.g., commercial providers, colleges).

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

☒ **Yes** ☐ **No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

CEDMS does not collect the PII directly from the individual. The individuals have an opportunity to object at the stage when the PII is collected by each DoD Agency or Component prior to transfer to DFAS and CEDMS. Once the PII is provided to DFAS, it is transferred to CEDMS through information sharing and stored as a final repository with no additional opportunity to object.

(2) If "No," state the reason why individuals cannot object.

j. 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.

CEDMS does not collect the PII directly from the individual. The individuals have an opportunity to object at the stage when the PII is collected by each DoD Agency or Component prior to transfer to DFAS and CEDMS. Once the PII is provided to DFAS, it is transferred to CEDMS through information sharing and stored as a final repository with no additional opportunity to object.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. **What information is provided to an individual when asked to provide PII data?** Indicate all that apply.

☒	**Privacy Act Statement**	☐	**Privacy Advisory**
☐	**Other**	☐	**None**

Describe each applicable format.	CEDMS does not collect PII directly from the individual. It receives PII through information sharing. Privacy Act Statements are provided to individuals when the data is initially collected by each DoD agency or component.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.