



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Total Force Administration System/Marine Online (TFAS/MOL)

Department of Navy - USMC - HQMC TSO

### **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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

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
- 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

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

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

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.

**SORN M01040-3 authorities:**

10 U.S.C. 5013, Secretary of the Navy  
10 U.S.C. 5041, Headquarters, Marine Corps  
10 U.S.C. 1074f, Medical Tracking System for Members Deployed Overseas  
32 CFR 64.4, Management and Mobilization  
DoD Dir 1215.13, Reserve Component Member Participation Policy  
DoD Instruction 3001.02, Personnel Accountability in Conjunction with Natural and Manmade Disasters  
CJCSM 3150.13B, Joint Reporting Structure Personnel Manual  
DoD Instruction 6490.03, Deployment Health  
MCMEDS: SECNAVINST 1770.3D, Management and Disposition of Incapacitation Benefits for Members of the Navy and Marine Corps Reserve Components (Renamed Line of Duty(LOD))  
MCO 7220.50, Marine Corps Policy for paying Reserve Marines  
E.O. 9397 (SSN), as amended.

**Additional authorities:**

Marine Corps Order (MCO) P1050.3H Regulations for Leave, Liberty, and Administrative Absence,  
MCO P1070.12K Individual Records Administration Manual,  
MCO P1400.32D Marine Corps Promotion Manual,

**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.

To maintain records of pay and personnel data on all active and reserve Marine Corps personnel, and to maintain personnel data from all retired Marine Corps personnel. TFAS-MOL is a suite of Web-based applications that support Marines accessing personnel data on themselves and Marines within their chain of command; it has upgraded the human resource processes by improving administrative procedures and efficiency of administrative support. The TFAS database accesses an extract of the Marine Corps Total Force System's (MCTFS) Operational Data Store Enterprise database (ODSE) enabling automated processing, decreasing redundant data input, reducing costs associated with administrative transactions and ensuring the accuracy of Marine Corps Total Force System (MCTFS) data.

Personal information collected: Name, SSN (full and truncated), Other ID (DoD ID number), citizenship, legal status, gender, race/ethnicity, birth date, place of birth, personal cell telephone number, home telephone number, personal email address, mailing/home address, religious preference, security clearance, mother's maiden name, mother's middle name, Spouse information: Name, SSN, other names, Gender, Birthdate, Place of Birth, Citizenship, Race/Ethnicity; Marital status: Married, Single, Divorced; Child information: Date of Birth, Citizenship, Gender, Place of Birth; Financial information: For Military members only... Direct Deposit and Electronic Transfer (EFT) data (Bank Name, routing id, bank account); Medical information: For Military members only... Sick in Quarters Status, Medical Evacuation, Hospitalization Data, Wounded Warrior Data, Medical Hold Requests. Members can also access Medical Readiness Reporting System (MRRS) Data, through a web service with MRRS. Data such as Medical Examinations and Test Results are available for members view only and data is not stored by TFAS MOL.; Disability information: Currently none. However starting in April 2016, VA disability information (combined disability rating) will be stored.; Employment information: For reserve Members... Employer Name, date of employment; Military records: For Military members only... Component Code, Duty Status Codes, Order Processing Data, Duty Stations, Mobilization Data, deployment Information, Temporary Duty, Work related contact information, Future Duty Stations, Combat Tour Information, Separation Document Code, training information etc. Emergency contact information: For Military members only....Name, address, phone numbers of emergency contacts; emergency contact information, education information; Education information: Highest degree obtained.

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

Although PII is not authorized to be shared or released to individuals, applications, or systems which are not used exclusively by authorized DoD personnel or for other authorized purposes without prior written consent of the individual, the potential for "hackers" or dishonest employees to unlawfully disclose individuals PII does exist. In order to mitigate disclosure of this information TFAS only makes the data available to applications and systems which are used exclusively by authorized DoD personnel or for other authorized purposes. Unauthorized release of PII will not be allowed unless the individual has provided written consent using the standard Privacy Act Statement Release Form.

TFAS has implemented all applicable controls from DoD Instruction 8500.2 based on a Mission Assurance Category (MAC) III Sensitive system. TFAS has implemented a partial Public Key Infrastructure (PKI) enabled solution which allows users who are able to authenticate with DoD PKI on their Common Access Card (CAC). Other end users that are not CAC eligible are able to authentic using username and strong passwords that meet all USMC and DoD password requirements. A defense in depth strategy is employed that includes Intrusion Detection System (IDS) monitoring, and access is controlled through firewall devices. All external communications are secured using FIPS 140-2 approved encryption mechanisms. All internal communications occur using accounts to connect to servers within the enclave and are therefore not publicly exposed.

**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 may be shared with the Army, Navy, Air Force, Marine Corps, Coast Guard, and DoD Agencies.

**Other DoD Components.**

Specify.

By officials and employees of the American Red Cross and the Navy Relief Society in the performance of their duties - Access will be limited to those portions of the member's record required to effectively assist the member.

**Other Federal Agencies.**

Specify.

By officials and employees of federal government through Official request for information with respect to law enforcement, investigatory procedures, criminal prosecution, civil court action and regulatory order

**State and Local Agencies.**

Specify.

By officials and employees of state and local government through Official request for information with respect to law enforcement, investigatory procedures, criminal prosecution, civil court action and regulatory order

**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.

Individual may object to information in TFAS at any time during data collection, or at anytime after with the USMC Privacy Office. If no objections are received, consent is presumed. An annual audit is conducted to give members the opportunity to review their information and update it as necessary. Members can also view their individual record at any time through the TFAS self-service personnel portal. Additionally, individuals can ask to view or update the information at any time through any base Consolidated Administration (CONAD) or Installation Personnel Administrative Center (IPAC).

A Privacy Act system of records notice was published in the Federal Register with a 30 day public comment period.

(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.

Individuals may object to information sent to the TFAS RAC from ODSE at anytime. An Annual Audit is conducted to give individuals/members the opportunity to review their information and update it as necessary. Individuals/members can also view their individual record "at any time" through TFAS/MOL. Other individuals can ask to view or update their information "at any time" through any base Installation Personnel Administrative Center (IPAC). A request for personal information for any reason other than official business must be accompanied by a disclosure agreement signed by the Marine(s) the information is being requested for.

(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.	A Privacy Act Statement is signed by all service members as required by 5 U.S. C. 552a(3). The Privacy Act Statement is obtained and maintained within the system which allows the individual to make an informed decision about providing data. All Privacy Act Statements for "Non-Military" personnel are maintained by the organization that requested or first entered the information into TFAS. The statement advises the individual that the information provided is voluntary; and provides the consequences of choosing not to participate with the information collection. The following disclosure statement is used as guidance when obtaining and releasing of PII: "No agency shall disclose any record which is contained in a system of records by any means of communication to any person, or to another agency, except pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains, unless disclosure of the record would be to those officers and employees of the agency which maintains the record who have a need for the record in the performance of their duties." There is also a web service and external link disclaimer that informs the service member that TFAS provides web services and external links with other web information systems providing administrative-related information that are operated by other government organizations and private parties. We have no control over the objectionable or
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inaccurate data provided from those systems. Some of the data listed within the pages of our applications are provided by organizations outside the Marine Corps Domain. This data is offered as a convenience and for informational purposes only.

**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.**