



PRIVACY IMPACT ASSESSMENT (PIA)

For the

TRANSPORTATION MANAGEMENT SYSTEM (TMS 1.0)

Department of the Navy - USMC

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.

Public Law 100-562, Imported Vehicle Safety Compliance Act of 1988; 5 U.S.C. 5726, Storage Expenses, Household Goods and Personal Effects; 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 8013, Secretary of the Air Force, 19 U.S.C. 1498, Entry Under Regulations; 37 U.S.C. 406, Travel and Transportation Allowances, Dependents, Baggage and Household Effects; Federal Acquisition Regulation (FAR); Joint Federal Travel Regulation (JTR), Volumes I and II, DoD Directive 4500.9E, Transportation and Traffic Management; DOD Directive 5158.4, United States Transportation Command ; DoD Instruction 4500.42, DoD Transportation Reservation and Ticketing Services; DoD Regulation 4140.1, DoD Materiel Management Regulation; DoD Regulation 4500.9, Defense Transportation Regulation; and DoD Regulation 4515.13-R, Air Transportation Eligibility 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.

The Transportation Management System (TMS) is an automated mainframe, on-line system developed to handle the requirements of the United States Marine Corps (USMC) transportation community as related to the worldwide movement of Marine Corps personnel and materials. This automated system provides the tools to process the receipt, prepayment audit, certification, and payment of all claims submitted for transportation services performed for the Marine Corps. Part of this Program involves the collection of Personally Identifiable Information (PII) from Marine Corps personnel in order to track and archive individual Claims related to the movement of Household Goods.

The PII collected includes: Name, SSN, Rank and Financial Information. This system is in the production phase and is being used daily.

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

Each USMC installation handles its TMS data in accordance with the Privacy Act and the system complies with FISMA/DIACAP requirements. Role-based access controls are used for controlling access to the system using the policy of least privilege, which states that the system will enforce the most restrictive set of rights/privileges or access need by users based on their roles. They create roles for each level of access required for their employees to perform their job functions and follow procedures including security and privacy training, and need-based job responsibility. TMS limits dissemination of USMC PII only to those with a business need to know, to minimize the risk of data misuse. Personnel Names and SSNs are the only PII collected to adequately track Military Moves for USMC members.

The system is audited annually and includes a real-time audit trail to:

1. Track access to electronic information and changes to data;
2. Monitor implementation and use of intrusion detection software and hardware;
3. Verify installation of data integrity monitoring software;
4. Provide real time monitoring of system audit logs; and
5. Ensure separation of data access based upon user roles and responsibilities.

The USMC uses published National Institute of Standards and Technology (NIST) best practices regarding access logging for auditing consistent with these measures.

In addition, the Program is designed to provide for secure transmission of personnel PII through encryption, SSL and other technology to minimize the risk of data loss or interception.

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.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

Defense and Finance and Accounting Service (DFAS)

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.

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

Executive Order 9397 of 23 November 1943, allows a federal department to utilize Social Security Numbers as account numbers for individual persons.

USMC Regulations require Name and SSN to be provided and associated with all documentation related to the Movement of a Military Member's Household Goods via a Commercial Carrier or by way of a Do It Yourself (DITY) Move. The INFORMATION is FOR OFFICIAL USE ONLY and is critical for the successful Contracting, Payment and Reimbursement for USMC Moves.

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.

N/A

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

USMC Regulations require Name and SSN to be provided and associated with all documentation related to the Movement of a Military Member's Household Goods via a Commercial Carrier or by way of a Do It Yourself (DITY) Move. The INFORMATION is FOR OFFICIAL USE ONLY and is critical for the successful Contracting, Payment and Reimbursement for USMC Moves.

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.

When an individual furnishes personal information about himself or herself for inclusion in TMS, a Privacy Act statement is provided each and every time PII is collected for individual education and to reiterate the fact, PII data will be used FOR OFFICIAL USE ONLY and therefore afforded data protection as specified in (g) 2 above. The individual PII Data relevant to TMS includes the individuals Name and SSN which is associated to their military move for either Retirement, Separation or Permanent Change of Station. The Name and SSN is also linked to any Do It Yourself (DITY) moves and serve as key links to all subsequent Claims the individual files related to their DITY Move. Individuals can obtain information pertaining to Claim Status and Reimbursement Amount by entering or providing Name and SSN.

TMS users are required to read and acknowledge a Privacy Act Warning (PAW) which notifies the official user that they are entering into a system that is governed by rulemaking established by the Privacy Act of 1974 [5 U.S.C. 552a] and that mandated safeguarding, handling and disposal procedures must be observed. The PAW further apprises the official user that they are not allowed to share or disseminate PII from the system unless authorized by law and that civil and /or criminal penalties will apply.

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.