

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:

Comply to Connect Enterprise Reporting Manager (C2C ERM)

2. DOD COMPONENT NAME:

Defense Information Systems Agency

3. PIA APPROVAL DATE:

6/16/2022

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- | | |
|---|--|
| <input type="checkbox"/> From members of the general public | <input type="checkbox"/> From Federal employees |
| <input checked="" type="checkbox"/> from both members of the general public and Federal employees | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

b. The PII is in a: (Check one.)

- | | |
|--|---|
| <input checked="" type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input type="checkbox"/> Existing DoD Information System | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 Comply to Connect Enterprise Reporting Manager (C2C ERM) solution is part of the larger Comply-to-Connect (C2C) program developed by the Defense Information Systems Agency (DISA). The purpose of the ERM solution is to consolidate Master Endpoint Record (MER) data collected by the DoD Components' C2C solutions. Consolidating MER endpoint data creates a centralized repository for C2C data reporting, analysis, and compliance tracking.

C2C ERM collects first and last names of DoD Components' endpoint device users via automated reporting of MER data from DoD Components' C2C solutions to C2C ERM. C2C ERM also collects Personally Identity Verification (PIV) numbers from users during the authentication process.

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 (first and last names) from endpoint device users is collected as part of C2C reporting requirements. PII (PIV numbers) is collected from C2C ERM users for identification and authentication.

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.

Individuals can object to collection of their PII by choosing not to access to devices and systems from which PII is collected.

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.

Individuals can withhold their consent by declining to access the devices and systems from which PII is collected.

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.)

- | | | |
|--|--|---|
| <input type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory | <input type="checkbox"/> Not Applicable |
|--|--|---|

This is a DoD information system. This system collects information about users that is protected under the Privacy Act of 1974. This

information includes Personal Identity Verification (PIV) numbers of individuals who are responsible for monitoring DoD Components' compliance with C2C requirements, including enterprise reporting, and of individuals who are responsible for maintaining this system. This information is used to authenticate users.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?

(Check all that apply)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. DISA |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. Joint Forces Headquarters-Department of Defense Information Network (JFHQ-DODIN) |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. |
| <input type="checkbox"/> State and Local Agencies | Specify. |
| <input type="checkbox"/> 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. |
| <input type="checkbox"/> 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)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Individuals | <input type="checkbox"/> Databases |
| <input checked="" type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

DoD Common Access Cards (CAC), DoD endpoint devices

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

- | | |
|---|--|
| <input type="checkbox"/> E-mail | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input checked="" 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.dod.mil/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.

The PII collected by C2C ERM is not retrieved by name or personal identifier, as detailed in DoD 5400.11-R, section C1.1.2. Retrieval Practices.

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. N1-GRS-07-3, item 13b

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

(3) Retention Instructions.

Temporary. Destroy/delete when 7 years 6 months to 20 years 6 months old, based on the maximum level of operation of the appropriate CA and after the information record the PKI is designed to protect and/or access is destroyed according to an authorized schedule, or in the case of permanent records, when the record is transferred to NARA legal custody. Longer retention is authorized if the agency determines that transaction-specific PKI records are needed for a longer period.

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.

The following authority allows Comply to Connect Enterprise Reporting Manager (C2C ERM) to collect the following data: Executive Order 10450 National Archives;

Public Law 99-474, the Computer Fraud and Abuse Act;

Public Law 114-328, National Defense Authorization Act for Fiscal Year 2017, Section 1653

5.U.S.C 301, Departmental Regulation

DoD Directive 5105.19, Defense Information Systems Agency

DoDI 8510.01, Risk Management Framework (RMF) for DoD IT

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.

OMB approval is not required in accordance with DoD Manual 8910.01, Vol 2, "DoD Information Collections Manual: Procedure for DoD Public Information Collections."