

## 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:**

Transportation Operational Personal Property Standard System (TOPS)

**2. DOD COMPONENT NAME:**

United States Transportation Command

**3. PIA APPROVAL DATE:**

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

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

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

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" 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.**

TOPS provides the Services' transportation counseling and shipping offices with the means to counsel DoD members on shipment and/or storage of personal property and process their shipments. TOPS manages the non-temporary storage for the DoD members, as well as all the local billing documentation required for non-temporary storage services for the DoD and U.S. Coast Guard. DoD customers log into the Defense Personal Property System (DPS), and if required, DPS will transfer the information to TOPS for certain types of shipments. PPSOs use TOPS to route and book shipments to commercial carriers, known as Transportation Service Providers (TSPs), as well as destination services such as clearing, delivery, and temporary storage. DPS is the interface to the DoD customer; DPS and TOPS are used for back-office functions based on the personal property movement requested. Personally Identifiable Information (PII) is collected for the movement of personal property shipments to include payment to carrier. It also provides financial data in Electronic Data Interchange (EDI) format to the Defense Finance and Accounting Services (DFAS) for carrier and agent payments, and provides data interfaces with other Service systems. Information collected includes name, social security number, gender, citizenship, birth date, personal/work phone numbers, home address, emergency contact information, employment information and spouse/dependent information.

**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 is collected for identification of an individual and for processing of personal property movements as per individual's Government Permanent Change of Station (PCS) orders.

**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.

When requesting shipment and/or storage of personal property, the prospective user submits an application (i.e., DD Form 1299, DD Form 2875). The form advises the applicant that "DISCLOSURE is voluntary; however, failure to provide the requested information may delay shipping dates and impede storage arrangements." There is a requirement on many DoD Forms relevant to personal property shipments that require the military member to provide a social security number (SSN). In the Electronic Transportation Authorization (ETA) system, the system through which customers access DPS and information is transferred to TOPS, if individuals decline to provide the PII requested, they will receive an error message and will not be able to proceed in DPS. If the applicant does not provide requested information on required forms, the Personal Property Shipping Office (PPSO) will manually input the PII into TOPS for the individual in order to process the shipment. This does not apply to U.S. Coast Guard members; they use an employee identification number. If the individual objects to the collection of their PII, they can elect to move their personal property at their own expense or waive their personal property movement entitlement (i.e. not move their property at that time).

**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.

A warning banner that must be acknowledged by the user is used to inform each individual whom it asks to supply information the authority for data collection, the principle purpose or purposes for which the information is intended to be used, the routine uses which may be made of the information, and the effects on the individual, if any, of not providing all or any part of the requested information IAW the Privacy Act of 1974. PII is collected for personal property movement only.

**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       Not Applicable

**PRIVACY ACT STATEMENT:**

**AUTHORITY:** 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.

**PRINCIPAL PURPOSES:** PII is collected for movement of personal property shipments to include payment of carrier. It also provides financial data in Electronic Data Interchange (EDI) format to the Defense Finance and Accounting Services (DFAS) for carrier and agent payments and provides data interfaces with other Service systems.

**ROUTINE USES:** Transportation Service Providers, General Services Administration (GSA), U.S. Department of Homeland Security, U.S. Coast Guard, U.S. Customs and Border Protection, and Department of State.

**DISCLOSURE:** Disclosure of this information is voluntary; however, failure to provide the requested information may delay shipping dates and impede storage arrangements.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)**

- |   |          |  |
|---|----------|--|
| <input checked="" type="checkbox"/> Within the DoD Component  | Specify. | United States Transportation Command (USTRANSCOM)  |
| <input checked="" type="checkbox"/> Other DoD Components  | Specify. | Military Surface Deployment and Distribution Command (SDDC), Defense Finance and Accounting Services (DFAS), U.S. Navy, U.S. Marine Corps, U.S. Army, and U.S. Air Force. The Services' Personal Property Processing Offices (PPPO), Personal Property Shipping Offices (PPSO) and Military Claims Offices (MCO)   |
| <input checked="" type="checkbox"/> Other Federal Agencies  | Specify. | General Services Administration (GSA), U.S. Coast Guard, Homeland Security, Department of State, and U.S. Customs and Border Protection  |
| <input type="checkbox"/> State and Local Agencies   | Specify. |  |
| <input checked="" 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. | The TOPS contractor, VETS, shall comply with Federal Information Processing Standards (FIPS) and Federal laws and regulations that affect IT systems operations. Examples are the Privacy Act of 1974, the Federal Information Security Management Act (FISMA), and the Defense Transportation Regulation 4500.9R. |
| <input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).   | Specify. | Multiple TSPs/Carriers/Warehouses (1100); TSPS/U.S. Bank - Privacy Act Notice.   |

**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           |   |

Individual DOD customer submits name, Social Security Number (SSN), phone, address, spouse name, emergency contact, and email address as part of the Electronic Transportation Acquisition (ETA) registration process. The DPS collects rank/pay grade and employment information during orders processing from official orders and transfers information into TOPS if required.

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

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> E-mail  | <input checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> Face-to-Face Contact                          | <input checked="" type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax  | <input checked="" 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) |   |

PCS Orders (AF Form 899, CG-5131 (EIN #), NAVPERS 7041/1, USMC Web Orders and DD Form 1614), DD Forms 1164, 1299, 1671, 1796, 1797, 1857, 2273, 619-1, 1252, 1252-1, and ATF F6 Part II.

**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.d.defense.gov/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.

**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.

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

(3) Retention Instructions.

NARA not required pursuant to the Personal Property Systems' Records Management Plan. Records maintained in TOPS are considered Temporary IAW CJCSM 5760.01 Vol 1 and 2, 0600-03-G. System records are purged IAW Revised Document Retention Periods for Financial Records Memo, dated 2015. Systems that have been identified without the proper schedule requirements with NARA will be processed by the Command Records Manager upon further training and resources. This process will be sent to the PM once established.

**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.

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 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 4140.1, DoD Supply Chain Material Management; DTR 4500.9-R, Defense Transportation Regulation; DoD Instruction 4515.13, Air Transportation Eligibility; and DoD Directive 4500.57, Transportation and Traffic Management.

**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.

E8-26765; filed 10 November 2008 NOTE: This system needs an OMB Control number