

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:

EDI, within Surface Deployment and Distribution Command, G6 Cloud Services (SDDC-CS)

2. DOD COMPONENT NAME:

United States Army

3. PIA APPROVAL DATE:

05/17/22

SDDC G6

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

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

- From members of the general public From Federal employees and/or Federal contractors
 From both members of the general public and Federal employees and/or Federal contractors Not Collected (if checked proceed to Section 4)

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

- New DoD Information System New Electronic Collection
 Existing DoD Information System Existing Electronic Collection
 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.

Electronic Data Interchange (EDI) is a translation system hosted in Amazon Web Service (AWS) GovCloud along with the portfolio of other SDDC's enterprise business systems. EDI is a component of SDDC G6 Cloud Services (CS) along with other updating/patching systems and storage systems. The translation of EDI transactions involves restructuring the order of fields and the field names of industry-standard EDI transactions into a user-defined structure that the SDDC program expects to read in. The reverse of this process is done for SDDC-generated transactions that are transmitted out of our enterprise business systems. The EDI system also checks for data errors in transactions.

PII that may pass through SDDC-CS: Name(s), SSN, Gender/Gender Identification, and Birth Date.

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)

EDI transactions are information files used to conduct SDDC's cargo movement business, and are collected and used by various systems such as Global Freight Management (GFM), Integrated Booking System (IBS), and Transportation Financial Management System (TFMS). These EDI transactions pass through the EDI system for error-checking and translation to different formats but are not collected by the EDI system. The EDI system does not have external users nor user accounts.

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.

Other G6 systems such as GFM and TFMS collect PII and it is contained in EDI transactions that are necessary as being the minimum information to conduct and complete cargo shipments by GFM and financial payments made by TFMS. EDI transactions in the EDI system are system-to-system pass-through transactions and are not collected nor stored.

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.

All cargo carriers doing business with SDDC must comply with the G3 Freight Carrier Registration Program to become approved carriers, and they complete and sign Trading Partner Agreements with SDDC that explain all EDI data transaction requirements. Carriers or any users of SDDC enterprise business systems give their consent to providing any required PII to the business system (e.g., GFM or TFMS).

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

The EDI system does not have users or user accounts, so external individuals do not access it to provide PII. The SDDC enterprise business systems that do collect PII in order to conduct business do provide a PAS or a Privacy Advisory. Please consult the PIAs for those systems for more information.

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

- Within the DoD Component Specify.
- Other DoD Components Specify.
- Other Federal Agencies Specify.
- State and Local Agencies Specify.
- 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.
- 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)

- Individuals Databases
- Existing DoD Information Systems Commercial Systems
- Other Federal Information Systems

The EDI system does not collect PII. PII may be included in some EDI transactions that are collected by other systems and that pass through and are error-checked and translated by the EDI system.

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

- E-mail Official Form (Enter Form Number(s) in the box below)
- Face-to-Face Contact Paper
- Fax Telephone Interview
- Information Sharing - System to System Website/E-Form
- Other (If Other, enter the information in the box below)

The EDI system does not collect PII. PII may be included in some EDI transactions that pass through and are error-checked and translated by the EDI system.

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.

The EDI system does not collect PII. PII may be included in some EDI transactions that pass through and are error-checked and translated by the EDI system. Please consult the PIA for GFM and TFMS to identify the SORN System Identifier.

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.

The EDI system does not collect or retain records containing PII.

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 EDI system does not collect PII.

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.

The EDI system is an EDI transaction error-checking and translation system, and serves as a pass-through of EDI transactions, and does not collect PII.