

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:

WHS Acquisition Modernization Initiative (AMI) NIPRNET

2. DOD COMPONENT NAME:

Washington Headquarters Service

3. PIA APPROVAL DATE:

11/04/22

Acquisition Directorate

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.)

- From members of the general public From Federal employees
 from both members of the general public and Federal employees 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.

The primary purpose of the system is to establish a collaborative environment to upload and review data that is submitted by prime and subcontractors to enable acquisition personnel to make pre-award and post award acquisition determinations. The system facilitates reviews and approvals, provides management workload and reporting metrics, and gives an overall business process assessment. The final documents produced by the system represent the federal records that are moved and maintained in another system where the award documents are generated. This system will only show the history of work activity related to the process of getting documents approved, any non-decision activity status, workload assignments and statistical reports managed by leadership which is retrieved by the employee's name. The vendor name, official duty address, work e-mail address, official duty telephone number, position/title are loaded into the system for a short period until the final documents are moved to the other system where final determination is made.

The types of PII that appear in documents are: Name(s), Official Duty Address, Work E-mail Address, Official Duty Telephone Phone, Position/Title, DoD ID Number (in digital signatures only).

NOTE: ONLY Government personnel will have access to the AMI system. This is where Name(s) and User ID as identified on their CAC are used for authentication purposes for system access. Vendor information ONLY appears in documents loaded to AMI by government personnel in AD contracting operations.

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)

Low impact PII is required in documents relating to the execution of Government contracting to create legally binding agreements with commercial vendors as well as agreements with other government agencies. Authentication, verification and mission-related use of PII is required because without this information, there is no means of supporting agency/organization mission objectives.

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.

Choosing a career in Government Acquisition as a contracting professional is a decision that includes the understanding of what's involved with executing government contracts. This statement also applies to vendors who supply government goods and services.

Role designations and digital signatures are basic requirements in several contract related documents as well as a variety of systems associated with the acquisition process. Vendor information is normally acquired in the form of final award oriented contracting documents.

Individuals, government contracting professionals or vendors, who would object to the information needed to execute government contracting, could not effectively serve in a warranted contracting position to represent the Federal Government, or, represent any vendor organization in the pursuit of working with the Federal Government. In addition, vendors would not be awarded the contract if required information is not provided

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.

The primary use case for establishing legally sufficient government contract documents in support of mission objectives. The known and recognized exceptions are FOIA requests and Litigation Inquiries. In these cases, documents are redacted, as appropriate, by Policy Reviewers prior to release. FOIA and Litigation scenarios are however, outside the scope of the AMI system.

Here again, individuals, government contracting professionals or vendors, who would object to the information needed to execute government contracting, could not effectively serve positions relating to executing contracting activities. This applies to both Government and non-Government personnel.

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: 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 133b, Under Secretary of Defense for Acquisition and Sustainment; e-Government Act of 2002, Public Law 107-347 Section 204; Public Contracts, Public Law 111-350 Sections 101, 6101, 7101, 8101; Digital Accountability and Transparency Act of 2014, Public Law 113-101; 41 U.S.C. Chapter 7, Office of Federal Procurement Policy; 41 U.S.C. Chapter 13, Acquisition Councils (Parts) 1301-1304; 41 U.S.C. Chapter 35, Truthful Cost or Pricing Data (Parts) 3501-3509; Executive Order 12931, Federal Procurement Reform; DoD Directive 5135.02, Under Secretary of Defense for Acquisition and Sustainment; DoD Directive 5105.53, Director of Administration and Management; and DoD Directive 5110.4, Washington Headquarters Services; DoD Instruction 5000.35, Defense Acquisition Regulations (DAR) System (covers requirements in Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement (DARS) and DFARS Procedures, Guidance and Information (PGI).

PURPOSE(S): The primary purpose of the system is to establish a collaborative environment to upload and review data that is submitted by prime and subcontractors to enable acquisition personnel to make pre-award and post award acquisition determinations. The system facilitates reviews and approvals, provides management workload and reporting metrics, and gives an overall business process assessment. The final documents produced by the system represent the federal records that are moved and maintained in another system where the award documents are generated. This system will only show the history of work activity related to the process of getting documents approved, any non-decision activity status, workload assignments and statistical reports managed by leadership which is retrieved by the employee's name.

ROUTINE USE(S): In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, the records contained herein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as listed in the applicable system of records notice located at: <https://www.federalregister.gov/documents/2017/03/02/2017-04037/privacy-act-of-1974-system-of-records>

DISCLOSURE: Voluntary; however, failure to provide the requested information may result in vendors not being awarded the contract and federal personnel not being able to complete required duties to make a determination.

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)

Within the DoD Component

Specify.

Contracting is executed based on the requiring Office DoDAAC for all supported government field activities.

<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	All federal organizations utilizing AD for contracting.
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	All federal organizations utilizing AD for contracting.
<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.	Low impact PII is addressed in a Non-Disclosure Agreement attached to the contract that requires signatures by Contractor personnel. The contractor is also required to take all DoD training which includes PII training. It is not feasible to list every contractor we conduct business with.
<input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).	Specify.	FOIA, Litigation Requests w/Redaction, & Audits

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 type="checkbox"/> Existing DoD Information Systems	<input type="checkbox"/> Commercial Systems
<input type="checkbox"/> Other Federal Information Systems	

Low impact PII is applied to contract related documents at the direction of warranted contracting professionals throughout the acquisition process. The PII content does not come from any other system.

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 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 type="checkbox"/> Information Sharing - System to System	<input type="checkbox"/> Website/E-Form
<input checked="" type="checkbox"/> Other (If Other, enter the information in the box below)	

Low impact PII is collected in documents sent through email or the SAFE site when appropriate. Some information could be collected during meetings by phone or Teams, however, that information is only used to facilitate communication activities.

To the extent any of the PII applies to the actual contract documents, the information will be applied to documents uploaded to AMI.

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.

The following information was provided by the AD Records Administration Manager:

-----start

FILE DESCRIPTION: Documents establishing the contract file for future and continuing action. Contract Files are maintained in the Records Management Application (RMA).

DISPOSITION: Temporary. Destroy when uploaded into the contract file.

-----end

It is important to note that the destruction of files noted above relates to our current use of the AD Shared Dirve. It will also be applicable to the AMI system. All final contract documents, which represent the federal record, will be moved from AMI to the 5015.2 compliant Records management Application (RMA), and subsequently removed from AMI.

DISPOSITION: Temporary. Cut off after final payment or cancellation. Destroy 7 years after cutoff.

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.

AUTHORITY: 10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 133b, Under Secretary of Defense for Acquisition and Sustainment; e-Government Act of 2002, Public Law 107-347 Section 204; Public Contracts, Public Law 111-350 Sections 101, 6101, 7101, 8101; Digital Accountability and Transparency Act of 2014, Public Law 113-101; 41 U.S.C. Chapter 7, Office of Federal Procurement Policy; 41 U.S.C. Chapter 13, Acquisition Councils (Parts) 1301-1304; 41 U.S.C. Chapter 35, Truthful Cost or Pricing Data (Parts) 3501-3509; Executive Order 12931, Federal Procurement Reform; DoD Directive 5135.02, Under Secretary of Defense for Acquisition and Sustainment; DoD Directive 5105.53, Director of Administration and Management; and DoD Directive 5110.4, Washington Headquarters Services; DoD Instruction 5000.35, Defense Acquisition Regulations (DAR) System (covers requirements in Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement (DARS) and DFARS Procedures, Guidance and Information (PGI).

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.

Contract related documents are sent to vendors are electronically or manually signed. Collecting signatures on documents is the only means by which PII is collected or maintained in the RMA.