

## 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:**

Internet Complaints Tracking Production System (iComplaints)

**2. DOD COMPONENT NAME:**

Department of Defense Inspector General

**3. PIA APPROVAL DATE:**

11/28/17

### 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.**

The iComplaints system is an enterprise-level application that provides all of the necessary capability to collect, track, manage, process and report on IG's EEO discrimination complaint cases. The system uses a web-based interface to capture data for EEO complaint cases and to produce reports. iComplaints operates on multiple computer servers (a web server, an application server, a database server, a mail server); these servers exchange data constantly during the operation of the iComplaints system.

The system contains information pertaining to applicants and current or former employees who file a formal or informal EEO complaint against DoD OIG employees.

**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)

iComplaints requires the use of PII to identify the person making a complaint and enables EEO personnel to process complaints in accordance with the law.

**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.

Entry of PII into iComplaints is a necessary condition of involvement for an EEO complaint. Individuals involved with an EEO complaint are made to understand, through an interview process, that they are providing PII voluntarily for an EEO complaint.

**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.

While individuals have the right to refuse disclosure or stop the process at any point; if complainant initiates civil litigation, then PII can become a part of the legal case file.

**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 below hard copy of the Privacy Act Statement describing the agency's practices regarding the use, maintenance and collection of PII is provided to the individual submitting a complaint.

"Privacy Act Statement - This information is protected under the provisions of the Privacy Act of 1974. 29 CFR 1614.601 authorizes collection of this information. Although disclosure of the information is voluntary, failure to provide the information may impede the processing of the complaint action."

**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. | All DoD OIG components that require access to meet EEO requirements.  |
| <input checked="" type="checkbox"/> Other DoD Components   | Specify. | DoD Investigation and Resolution Directorates   |
| <input checked="" type="checkbox"/> Other Federal Agencies   | Specify. | Equal Employment Opportunity Commission (EEOC), Office of Special Counsel with active Memorandum of Agreement with EEOC, Administrative and/or Civil Adjudication Systems when applicable |
| <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 type="checkbox"/> Existing DoD Information Systems  | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems |   |

**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 checked="" type="checkbox"/> Face-to-Face Contact                          | <input checked="" type="checkbox"/> Paper                                      |
| <input checked="" type="checkbox"/> Fax   | <input checked="" type="checkbox"/> Telephone Interview                        |
| <input type="checkbox"/> Information Sharing - System to System                   | <input 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://dpcltd.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.

**i. 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.

Do not delete or transfer until DoD OIG receives NARA-approved disposition authority

**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.

DoD Directive (DoDD) 1440.1, "The DoD Civilian Equal Employment Opportunity (EEO) Program," dated May 21, 1987;

DoD Instruction (DODI) 1400.25, "DoD Civilian Personnel Management System: Investigation of Equal Employment Opportunity (EEO) Complaints," dated November 5, 2015;

Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715, "Instructions for Model EEO Programs," dated October 1, 2003;

IG Instruction 1020.1, "Processing Complaints of Discrimination Policy and Procedures," dated May 21, 2009.

**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 Control number not required, system does not collect records from 10 or more members of the public in a 12-month period.

