



PRIVACY IMPACT ASSESSMENT (PIA)

For the

DTRA Equal Employment Opportunity Reporting System (DEEORS)

Defense Threat Reduction Agency (DTRA)
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SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

42 U.S.C. 2000e-16(b) and (c); 29 U.S.C. 204(f) and 206(d); 29 U.S.C. 633(a); 29 U.S.C. 791; Reorg. Plan No. 1 of 1978, 43 FR 19607 (May 9, 1978); Exec. Order No. 12106, 44 FR 1053 (Jan. 3, 1979).

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

DTRA's Equal Employment Opportunity Reporting System (DEEORS) includes the enterprise-level, web-based COTS applications iComplaints and eversity. iComplaints is used to input, process, track, manage, and report on EEO complaint cases. iComplaints was developed specifically to manage the EEO process and generate the Form 462 annual report. It includes a number of critical features required by government agencies and departments for tracking and managing EEO complaints and cases to ensure compliance with EEOC MD-110, EEOC reporting requirements, and 29 CFR 1614. eversity is used to develop the MD-715 EEO Plan, automatically generate workforce analysis reports, required forms, and action items addressing obstacles and deficiencies identified in the workforce analysis. eversity provides a true affirmative employment database and management solution that aids achievement of DTRA's affirmative employment goals.

The collected PII includes complainant's name, date of birth, race, religion, gender, disability, national origin, prior EEO activity, home address, home telephone number, work telephone number, and information about the alleged discrimination claim (basis[es], issue[s] and requested relief). Collected PII includes manager and witness(es)' name, date of birth, race, religion, and national origin if pertinent to the complaint.

DD Form 2655, Complaint of Discrimination in the Federal Government and EEOC Form 573 Rev 1/01 are used to collect the information directly from the complainant.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

Privacy risks to the individual associated with the collected PII are unauthorized access to the data or possible misuse of the data.

System Access Controls safeguard privacy. These access controls limit access to the application and/or specific functional areas of the application. These controls consist of privileges, general access, password control and discretionary access control. Additionally, each user is associated with one or more roles. Each role provides some combination of privileges to a subset of the database contents. Users are granted only those privileges that are necessary for their job requirements. The same roles that protect the database tables also determine which buttons and menu items are enabled for the user currently logged on.

Further controls on the use of information within DEEORS include the training of users on the authorized use and proper handling of the PII data. DEEORS data is strictly limited to support personnel who are legally authorized to receive that information and have a need to see that information.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

Data may be viewed by or shared with employees assigned to the DTRA EEO offices such as EEO Managers, EEO Specialists, EEO Assistants, Agency attorneys, and EEO Investigators for the purposes of performing the agency's complaint processing functions under 29 CFR Part 1614.

Other DoD Components.

Specify.

No direct system access occurs only the provision of hardcopy or digital copies of system-generated reports with EEOC Administrative judges, Federal judges, attorneys, and others involved with an EEO case. Complaint

information is shared with Complainants' attorney as appropriate. Case files are not stored in this IT tool. With a written request of the complainant, information from this database may be shared with congressional offices or attorneys retained by the complainant. Data from this tool will be shared with contracted counselors, employers of contract investigators and witnesses, as appropriate, to carry out the agency's complaint processing responsibilities under 29 CFR Part 1614.

Other Federal Agencies.

Specify.

No direct system access occurs only the provision of hardcopy or digital copies of system-generated reports may be shared with EEOC Administrative judges, Federal judges, attorneys, and others involved with an EEO case. Complaint information is shared with Complainants' attorney as appropriate. Case files are not stored in this IT tool. With a written request of the complainant, information from this database may be shared with congressional offices or attorneys retained by the complainant. Data from this tool will be shared with contracted counselors, employers of contract investigators and witnesses, as appropriate, to carry out the agency's complaint processing responsibilities under 29 CFR Part 1614.

State and Local Agencies.

Specify.

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

Contractor is Dimensional Insights and the contract language is "The Contractor may, on occasion, be required to handle information of a personal and sensitive nature. Therefore the Contractor shall ensure that it complies with the confidentiality regulations and guidance furnished by the component DTRA office where the work is performed. Prior to the performance of the work, the Contractor will be required to sign a DTRA non-disclosure agreement."

Other (e.g., commercial providers, colleges).

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

All personal data collected is voluntarily given by the complainant. The pre-complaint and formal complaint forms that collect personal data that is captured in DEEORS contain a Privacy Act Statement, as required by 5 U.S.C. 552a(e)(3), allowing the individual to make an informed decision about providing the data or participating in the program. The Statement advises that participation is voluntary; however, failure to provide the requested information may inhibit the processing of the complaint.

(2) If "No," state the reason why individuals cannot object.

j. 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.

All personal data collected is voluntarily given by the complainant. The pre-complaint and formal complaint forms that collect personal data that is captured in DEEORS contain a Privacy Act Statement, as required by 5 U.S.C. 552a(e)(3), allowing the individual to make an informed decision about providing the data or participating in the program. The Statement advises that participation is voluntary; however, failure to provide the requested information may inhibit the processing of the complaint.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

Privacy Act Statement **Privacy Advisory**
 Other **None**

Describe each applicable format.

A Privacy Act Statement, as required by 5 U.S.C. 552a(e)(3), is provided at the beginning of each stage of the EEO administrative complaint process when personal data is collected; pre-complaint and formal complaint stages. The Statement provides the following: authorities; collection purpose; external uses; the voluntary nature of the program and the fact that no consequences accrue for those who choose not to participate; the name and number of the Privacy Act system notice governing the collection, and an electronic link to the system notice. The Statement is included on paper and electronic collection forms.