

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:

EEO Case Management

2. DOD COMPONENT NAME:

Defense Commissary Agency

3. PIA APPROVAL DATE:

09/11/25

Defense Commissary Agency (DeCA), Equal Opportunity Office

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.

EEO Case Management (EEOCM) is a suite of applications used to collect, analyze, disseminate, and manage data on discrimination complaints and counseling. It is used to prepare reports to the Federal EEO Commission, higher levels of DoD, and Congress. EEOCM includes applications for Complaints, Anti-Harassment, and Reasonable Accommodations.

The types of PII may include employment information such as position, title, rank, or grade, contact information such as personal and work phone numbers, addresses, and email address; personal information such as date of birth, race, ethnicity, gender, religious preference, and marital status; and medical information such as disability information (physical and mental), medical information, and protected health 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)

Administrative, verification and identification use - to track and report on EEO Counseling, Complaints, Reasonable Accommodation and Anti-Harassment Activity.

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.

Most of the information in this system is self reported, but on on occasion, some of the PII concerning a federal employee collected in this system is from DCPDS. At the time that that information is collected for inclusion in those systems, employees are notified that they may refuse to provide the information requested, but that failure to do so may result in their complaint not being processed or delayed in processing.

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.

Most of the information in this system is self reported, but on on occasion, some of the PII concerning a federal employee collected in this system is from DCPDS. At the time that that information is collected for inclusion in those systems, employees are notified that they may refuse to provide the information requested, but that failure to do so may result in their complaint not being processed or delayed in processing.

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: The authority to collect the information requested by this interview is derived from one or more of the following: Title 5; Code of Federal Regulations, Sections 5.2 and 5.3; Title 5, Code of Federal Regulations, Section 713.216; Title 5 of United States Code, Section 1303 and 1304; Executive Order 11478, as amended; Executive 10577, 5 United States Code 1302, 3301, and 3302; Public Law 93-579 (Privacy Act of 1974), December 31, 1974

PURPOSES: The information you supply will be used with the information developed by investigation to resolve an Equal Employment Opportunity discrimination complaint. This information may be furnished to designated officers and employees of agencies and departments of the Federal government in order to resolve the complaint. The information may also be disclosed to any agency of the Federal government having oversight of review authority with regard to Civil Service Commission activities, to the intelligence agencies of the Federal government, or to others having reasons published in the Federal Register.

ROUTINE USES: Used by EEO staff to collect, analyze, and disseminate discrimination complaint and counseling data

VOLUNTARY OR MANDATORY: Voluntary

EFFECTS OF NOT PROVIDING INFORMATION: Failure to respond will result in a recommended disposition of the complaint on the basis of information available.

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.	N/A
☐ Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	N/A
☒ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	EEO employees OCONUS and CONUS with the need to know, authorized IT users with a need to know, Federal EEO Commission, higher levels of DoD, and Congress with a need to know.
☐ State and Local Agencies	Specify.	N/A
☐ 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.	N/A
☐ Other (e.g., commercial providers, colleges).	Specify.	N/A

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	

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)
☒ In-Person Contact	☒ Paper
☐ Fax	☒ Telephone Interview
☐ Information Sharing - System to System	☒ Website/E-Form
☐ 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://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.

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.

GRS 2.3, Item 111, DAA-GRS-2018-0002-0013

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

(3) Retention Instructions.

Temporary. Destroy 7 years after resolution of case, but longer retention is authorized if required for business use and coordinated with DeCA Records Management.

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.

Title VII of the Civil Rights Act of 1964
Age Discrimination in Employment Act (ADEA)
Americans with Disabilities Act (ADA)/Rehabilitation Act
Pregnancy Discrimination Act
Genetic Information Nondiscrimination Act (GINA)
44 USC, Chapter 35 (Paperwork Reduction Act) as amended.

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.