

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:

Entellitrak - Reasonable Accommodation (ETK-RA)

2. DOD COMPONENT NAME:

Defense Counterintelligence and Security Agency

3. PIA APPROVAL DATE:

11/17/2025

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.

Entellitrak is a platform for case management that will assist DCSA in its efforts processing a variety of RA requests such as, signed language interpreters, modification of work station, work schedule or personal assistance services. Entellitrak application only collects information pertaining to DCSA civilian employees. Information collected includes Name, Address, Phone number, Email, Grade Occupational series, and Medical documentation. This could include DOB and or SSN, However DOB and SSN are not requested.

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)

The PII collected by the ETK-RA application is used for mission related purposes in fulfilling reasonable accommodation requests. Procedures to facilitate the provision of reasonable accommodations are required by Executive Order 13164. Within the ETK-RA application, existing requests are typically located by the request number however they can also be located by the requesters name.

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.

If an individual requests reasonable accommodation, then PII is required to process the request.

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.

PII is required to provide requested reasonable accommodation. If individual provides PII, the specific uses of the PII are outlined in the applicable SORN (DoD-0007).

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 --

PURPOSE: Federal agencies have written procedures for providing reasonable accommodation and maintain records in order to monitor the effectiveness of the procedures.

AUTHORITIES: The Rehabilitation Act of 1973 as amended, 29 USC Section 791, 29 CFR Part 1614.203, 29 CFR Part 1630, Executive Order 13164.

ROUTINE USES: To maintain a record of all accommodation requests and decisions, which will be used to determine the efficacy and consistency of reasonable accommodation procedures process.

DISCLOSURE: Voluntary. Failure to provide the requested information may hinder the ability to provide a complete or effective reasonable accommodation.

Privacy Advisory regarding SSN/DOB (banner located at the top of the screen when users login):

"Please note SSN/DOB should be redacted before uploading the documents."

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.

Information in the Entellitrak is only accessible by the employee submitting the request, the reasonable accommodation team working in the Equal Employment Opportunity office and OCIO staff assigned to support ETK-RA.

☐ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

☐ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

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.

The system is managed and maintained by DCSA contractors under the OneIT contract awarded to SAIC. This contract stipulates that privacy information is safeguarded through encryption and certificate/password-based access controls. Personally Identifiable Information (PII) is protected within the OneIT environment in accordance with: Department of Defense (DoD) guidance and instructions; Federal Acquisition Regulations (FARs) implementation and compliance; Applicable Executive Orders that define and govern data protection processes. These measures ensure that sensitive data is handled securely and in alignment with federal cybersecurity standards.

☐ 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

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.

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

(3) Retention Instructions.

The ETK-RA application adheres to the approved DCSA records schedule: Destroy 6 years after final agency action or 3 years after final adjudication by the courts, whichever is later, but longer retention is authorized if required for business use.

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.

E.O. 13164 ; 10 U.S.C. 1582, Assistive Technology, Assistive Technology Devices, and Assistive Technology Services; 29 U.S.C. 791, Employment of Individuals with Disabilities; 29 U.S.C. 794, Nondiscrimination under Federal grants and programs; 29 U.S.C. 794d, Electronic and Information Technology; 42 U.S.C. Chapter 21B, Religious Freedom Restoration; 42 U.S.C. Chapter 21, Subchapter VI, Title VII of the Civil Rights Act; Reasonable Accommodation without undue hardship as required by section 701(j) of title VII of the Civil Rights Act of 1964; and 29 CFR 1614.203, Rehabilitation Act.

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.

Data is only collected from DCSA federal civilian employees.