

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:

Feith - RMA iQ

2. DOD COMPONENT NAME:

Defense Counterintelligence and Security Agency

3. PIA APPROVAL DATE:

12/30/2025

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.

Feith's records management application, RMA iQ, is a fully-integrated and fully-automated records and document management solution that ensures both electronic and physical records are acquired, administered, and disposed of based on DCSA's organizational requirements. The primary function of Feith at DCSA is as a records repository. The PII collected by the Feith RMA iQ application includes full name and social security number, which is utilized to positively identify records pertaining to an individual that are responsive to requests for records. Feith has the capability to view, manipulate, track, and destroy records in accordance with DoD policy and records schedule. In addition to being a records repository, Feith RMA iQ also has the functionality to support processing FOIA and PA requests. Feith is fully a Department of Defense certified records repository meeting DoD 5015.02 standard - which is required by DoD for a system to operate as a record repository within the DoD environment. RMA iQ also includes compliance for FOIA/PA, SEC Rule 17a-4 and SOX.

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 Feith RMA iQ application is for mission-related and administrative use. When processing requests for records, the primary method of records retrieval is by case tracking number, however the application has the capability to retrieve records by name or SSN if the case tracking number is unknown. Requesters are only asked to provide PII to facilitate the identification of records for identification, since there is a large number of Federal employees, contractors, civilians, and military personnel who have identical names and/or birth dates and whose identities can only be distinguished by their SSN.

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.

Individuals cannot directly object in the system. Individuals on whom the PII will be collected have given permission by voluntarily filling out DCSA Form 335. The submission of an individual's PII is voluntary. Individuals have the opportunity to object to the collection of PII upon submission of their request for records.

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.

Individuals cannot directly consent in the system. The submission of their PII is voluntary and only utilized when requesting records. The Privacy Act Statement (provided in section g) is noted on the request form notifying the individual of the use and purpose of the collection. Additionally, by signing the request for records form, DCSA 335 individuals consent to the use of their information for the purpose of retrieving responsive records.

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

Authorities: 5 U.S.C. 552, 5 U.S.C. 552a, 32 CFR part 310, 32 CFR part 286.

Principal Purpose(s): The purpose of the collection is to enable the DCSA – Defense Counterintelligence and Security Agency – to locate applicable records and to respond to requests made under the Freedom of Information Act and the Privacy Act of 1974.

Routine Use(s): The information collected will primarily be used to comply with requests for information under 5 U.S.C. § 552 and 5 U.S.C. § 552a. The information requested may be used by and disclosed to DCSA personnel, contractors, and/or shared externally with other government agencies as a routine use when necessary and relevant to assist in activities related to the processing of Freedom of Information Act and/or Privacy Act requests. Additionally, DCSA may use the information as necessary and authorized by the routine uses in the system of records notice associated with “Freedom of Information Act and Privacy Act Records,” DoD-0008. A complete list of the routine uses and full text of DoD-0008 can be located at <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-Wide-Notices/DOD-Wide-Article-List/>.

Disclosure: Information Regarding Disclosure of your Social Security Number (SSN) under Public Law 93-579, Section 7 (b). Solicitation of SSNs by DCSA is authorized under the provisions of Executive Order 9397, dated November 22, 1943. Providing your social security number is voluntary. You are asked to provide your social security number only to facilitate the identification of records relating to you. Without your social security number, DCSA may be unable to locate records. The use of SSNs is necessary because of the large number of Federal employees, contractors, civilians, and military personnel who have identical names and/or birth date and whose identities can only be distinguished by their SSNs.

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)

- | | | |
|---|----------|--|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. | Privacy (PCLT) and authorized DCSA employees with a need-to-know. |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | In accordance with the routine use provisions of the Privacy Act, PII may be shared with Other DoD Agencies on a need-to-know basis and reason for sharing is compatible with the purpose of the record creation |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | In accordance with the routine use provisions of the Privacy Act, PII may be shared with Other DoD Agencies on a need-to-know basis and reason for sharing is compatible with the purpose of the record creation. |
| <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. | Contractors who support DCSA in the performance of their duties may have access to the Feith application for the following reasons: records management, tier II/III system support; and administrative functions for FOIA/PA requests. |
| <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 checked="" 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 checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact | <input checked="" 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 type="checkbox"/> Other (If Other, enter the information in the box below) | |

DCSA Form 335

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 DoD-0008 (FOIA/PA Records) & DoD-0

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.

GRS 4.2, Item 020, Authority DAA-GRS2016-0002-0001; GRS 4.2, 065, DAA-GRS-2019-0001-0004; GRS 4.2, 090, DAA-GRS-2013-0007-0007

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

(3) Retention Instructions.

For GRS 4.2, Item 020, destroy records 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. For GRS 4.2, 065, DAA-GRS-2019-0001-0004, Destroy 3 years after resolution or referral, as appropriate, but longer retention is authorized if required for business use. For GRS 4.2, 090, DAA-GRS-2013-0007-0007, destroy with the records for which amendment was requested or 4 years after close of case (final determination by agency or final adjudication, whichever applies), whichever is later. 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.

5 U.S.C. 552, 5 U.S.C. 552a, 32 CFR part 310, 32 CFR part 286

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.

Information is collected via the DCSA Form 335, Freedom of Information/Privacy Act Records Request for Adjudication Records, which has an approved OMB control number. The control number is OMB No. 0704-0561.