

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:

Kodak Info Input (Kodak)

2. DOD COMPONENT NAME:

Defense Counterintelligence and Security Agency

3. PIA APPROVAL DATE:

05/28/26

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.

Kodak Info Input software automates the process of data extraction, indexing, and validation. This software allows for critical information to be input into systems and storage locations efficiently, accurately, and securely. Vouchers to include INV40, INV41, INV42, INV43 and INV44 forms will be received in the mail and will be scanned into Kodak Info Input. Info Input will then read the subject's identifiers and responses and apply our established business rules to automate the processing and eliminate manual review of each form.

A specific portion of this will include Time Based Checks as DCSA is required to conduct local law checks and employment checks every five years to comply with Trusted Workforce 1.5 regulations. Personnel Vetting is working to execute Time Based Checks which requires the use of Kodak Info Input software.

Through the scanning process and utilizing the Kodak Info Input software, images of the INV 41 and/or INV 44 forms will be captured in PDF format as well as extracting data. The image and data file will be stored in a folder (S3, AWS outpost of API). The data file will be stored to a network location to be picked up by a workload tool (AFLC).

PII collected includes: name, SSN, DOB, POB, AKA's, and address. This data will be collected from current-cleared military, federal contractors, civilian employees, state employees, etc.

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 is collected to identify the subject, verify their responses, and support automated processing of the INV40, INV41, INV42, INV43 and INV44 voucher forms. Kodak Info Input uses the subject identifiers and form responses to apply established business rules, which enables accurate data matching and eliminates the need for manual review.

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.

While to subject cannot object to the collection of their PII in the Kodak Info Input software specifically, the subject of an investigation signs a release prior to the investigation. If the release is not signed, the investigation does not move forward.

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 to subject cannot consent to the use of their PII in the Kodak Info Input software specifically, the subject of an investigation signs a release prior to the investigation. If the release is not signed, the investigation does not move forward.

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

Kodak Information Input is not used directly by the investigative subject or inquiry respondents. It is used by DCSA users.

The Notification: This banner serves as an explicit notification regarding privacy and monitoring.

The Purpose: It explicitly states that the system is for authorized government use only and that the user has no reasonable expectation of privacy regarding any communications or data routed through the system. It informs the contractor that their keystrokes, activities, and data are subject to monitoring, recording, and auditing.

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. Personnel Vetting and Acquisition and Technology

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.

Arctic Slope Regional Corporation (ASRC) Contractor Staff. The contract states: 1.5.9.1. Physical Security: The Contractor shall be responsible for safeguarding all Government equipment, information and property provided for Contractor use. At the close of each work period, Government facilities, equipment, and materials shall be secured. The Contractor shall safeguard and secure the identified equipment, information, property, facilities, and materials in accordance with the National Industrial Security Program Operating Manual (NISPOM) 32 CFR § 117 (reference 6.1.1(c)) and DCSA Interim Policy Memorandum 24-003, Protection of Personally Identifiable Information (PII) and Breach Reporting (reference 6.1.1(d)).

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

INV40, INV41, INV42, INV43 and INV44 forms

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)

INV40, INV41, INV42, INV43 and INV44 forms

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://dpclid.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.

Kodak Info Input is an imaging software and data is not stored within. A SORN is not required/applicable; data is not stored in a way that is unique to an individual and the data is not retrieved by a unique personal identifier.

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.

Temporary. Destroy 3 years after agreement, control measures, procedures, project, activity, or transaction is obsolete, completed, terminated or superseded, but longer retention is authorized if required for business use.

Coordination with DCSA Records Officer should be accomplished to ensure records are maintained and disposed of per the requirements of an applicable records schedule; and appropriate Paperwork Reduction Act (PRA) review with the Information Collection program is required.

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.

Section 925 of Public law 115-91; 5 USC 301; Executive Order 13467 as amended by Executive Order 13869, 5 CFR 736 and 5 USC 9101.

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.

Federal Background Investigation and Personnel Vetting Investigative Request Forms; INV 40-44; OMB Control Number 0705-0003, expiration date 20280531