

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:

NAF Human Resource Management System (NAF HRMS) V2

2. DOD COMPONENT NAME:

Department of the Navy/United States Marine Corps

3. PIA APPROVAL DATE:

06/18/25

Marine Corps Manpower and Reserve Affairs (M&RA), Business and Support Services Division (MR)

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.

To manage and administer personnel information for all Marine Corps Community Services (MCCS) applicants, personnel, retirees, and contingent workers. NAF HRMS is the official repository of personnel records, reports of personnel actions, and the documentation required in connection with these actions. Information is maintained to: manage personal, employment, and job-related functions pertaining to recruiting and human resources management; track job announcements, applicants and recruiting actions, manpower, grades, and personnel actions; maintain and extract Equal Employment Opportunity (EEO) reportable data; determine status, eligibility, and employee rights and benefits; administer benefit plan enrollments; project and disburse pension plan funds to retirees; manage and monitor time and attendance and labor distribution; compute employees' pay entitlements and deductions and issue payroll checks for amounts due; review earnings records; withhold amounts due for Federal, state, and city taxes, remit withholdings to the taxing authorities, and report earnings and tax collections; maintain current applicable suitability, background check(s), and security clearance completion information; track attendance at training courses; and provide authorized personnel services.

Types of personal information collected includes: name; Social Security Number/National ID number; employee ID number; DoD ID number; passport information; driver's license number; contact information; employment application information; employment information; education and qualifications information; military information as part of employment history; citizenship information; timekeeping information to include biometrics for verification on time collection device; payroll information; benefits information including identified dependents and beneficiary information; employment suitability, background check, and security clearance information; emergency contact information; disability information; sex; race/ethnicity; and separation and retirement 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 and mission-related uses.

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.

A Privacy Act Statement is provided to individuals prior to requesting their personal information so they may determine if they would like to provide their PII. Individuals may object to the collection of their information by not applying for employment and once employed, may choose to not participate in optional benefits programs. Individuals are provided opportunities to make changes to benefits information provided and/or selected during qualifying events.

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.

Providing information is considered consent. All information collected on the individual may be used for mission-related and administrative use in accordance with the purpose of the system without further consent of the individual.

Individuals are provided opportunities to make changes to benefits information provided and/or selected during qualifying events.

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: 5 U.S.C. 7201, 7204, and Chapters 53 subchapter IV, 55 subchapter V, and 83; 10 U.S.C. 5013; 10 U.S.C. 5041; Public Laws 103-337 (Section 349), 104-191 (Sections 102a and 262), and 110-173; DoDI 1400.25; DoDD 1400.25; SECNAVINST 12250.6B; MCO P12000.11A, as amended; MCO 1710.30; MCO 5380.2; E.O. 9397 (SSN), as amended; and SORNs N12293-1, NM07010-1, NM07421-1, NM01754-3, and A0215-1a FMWRC (DoD).

Purpose: To evaluate applicant qualifications and suitability for employment with Marine Corps Community Services (MCCS) and upon employment, data management and administration of personnel actions, benefits, payroll processing, retirement plans, and reporting and documentation required in connection with these actions.

Routine Uses: Information may be disclosed outside of DoD in accordance with the listed SORNs. Complete lists and explanations of applicable routine uses are accessible at <https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/SORNsIndex/DOD-Component-Notices/>.

Disclosure: Voluntary; however, failure to provide the requested information may result in ineligibility for employment, related benefits, and participation in related activities.

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. MCCS Retail Connexion (RCX); Microsoft Identity Manager; and Total Workforce Management System (TWMS)

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

Specify. Defense Manpower Data Center (DMDC); Army Air Force Exchange Service (AAFES)

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

Specify. Internal Revenue Service/Social Security Administration; Thrift Savings Plan

☒ State and Local Agencies

Specify. All 50 State Offices of Taxation; Local City Tax Agencies; State Employment Agencies

☒ 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. Raven Multimedia DBA Raven Solutions will be providing the Public Facing Website management services. Language in the contract that safeguards PII includes MCCS NAF privacy clauses which are comparable to the FAR privacy clauses 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and 39.105, Privacy.

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

Specify. Banking institutions to include: Bank of America; benefit vendors to include: Fidelity Investments, SEI, Aetna, PayFlex, Continental National American (CNA) Group, AON Hewitt, AFLAC, Kaiser California, Kaiser Hawaii, Kaiser Mid-Atlantic, Anthem, and other contract approved providers; and Corner Stone on Demand (Ethos Learning Management System)

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

Official personnel folder; Time Collection Device (internal to HRMS); benefit vendors to include Continental National American Group, Fidelity, and AFLAC; and Federal and State entities.

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)

Information Sharing system to system includes Fidelity Investments and AFLAC.

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 N12293-1, NM07010-1, 7421-1, 1754-3&

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. DAA-GRS-2016-0015-0004

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

(3) Retention Instructions.

TEMPORARY: Destroy when 56 years old (USMC Records Schedule 7000-37).

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.

N12293-1, Human Resources Civilian Portfolio (May 02, 2012, 77 FR 25993) authorities: 5 U.S.C. 301, Department Regulations; 5 U.S.C. Chapters 11, Office of Personnel Management; 13, Special Authority; 29, Commissions, Oaths and Records; 31, Authority for Employment; 33, Examination Selection, and Placement; 41, Training; 43, Performance Appraisal; 51, Classification; 53, Pay Rates and Systems; 55, Pay Administration; 61, Hours of Work; 63, Leave; 72, Antidiscrimination, Right to Petition Congress; 75, Adverse Actions; 83, Retirement; 99, Department of Defense National Security Personnel System; 5 U.S.C. 7201, Antidiscrimination Policy; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; E.O. 9830, Amending the Civil Service Rules and Providing for Federal Personnel Administration, as amended; 29 CFR 1614.601, EEO Group Statistics; SECNAV Instruction 12250.6B, Civilian Human Resources Management in the Department of the Navy; and E.O. 9397 (SSN), as amended.

NM07421-1, Time and Attendance Feeder Records (August 15, 2007, 72 FR 45798), authorities: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; and E.O. 9397 (SSN), as amended.

NM07010-1, DON Non-Appropriated Funds Standard Payroll System (June 16, 2014, 79 FR 34305), authorities: 10 U.S.C. 5013, Secretary of the Navy; CNICINST-7000.3, Accounting Procedures for Non-Appropriated Funds; and E.O. 9397 (SSN), as amended.

NM01754-3, DON Child and Youth Program (May 27, 2010, 75 FR 29728), authorities: 10 U.S.C. 5013, Secretary of the Navy; 10 U.S.C. 5041, Headquarters, Marine Corps; DoD Instruction 6060.02, Child Development Programs; DoD Instruction 6060.3, School Age Care Program; DoD Instruction 6060.04, Youth Services (YS) Policy; OPNAV Instruction 1700.9 series, Child and Youth Programs; Marine Corps Order 1710.30, Marine Corps Child and Youth Programs (CYP); and E.O. 9397 (SSN), as amended.

A0215-1a FMWRC (DoD), Department of Defense Non-appropriated Fund Health Benefits FMWRC (DoDNHB). (July 28, 2011, 76 FR 45234), authorities: Section 349 of Public Law number 103-337, formerly the National Defense Authorization Act for Fiscal Year 1995; Sections 102a and 262 of Public Law number 104-191, the Health Insurance Portability and Accountability Act of 1996; Public Law number 110-173 Medicare, Medicaid and SCHIP Extension Act (MMSEA) of 2007, E.O., 9397, (SSN), as amended.

In addition to those authorities listed: 10 U.S.C. 1588, Authority to Accept Certain Voluntary Services; DoD Instruction 1400.25, DoD Civilian Personnel Management System; DoD Directive 1400.25, DoD Civilian Personnel Management System; MCO P12000.11A, Marine Corps NAF Personnel Policy Manual, as amended; and MCO 5380.2, Marine Corps Volunteer Services Management.

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.

OMB Control Number 0712-0007, Nonappropriated Fund Human Resource Management System (NAF HRMS), with expiration date 6/30/2025. In coordination with ARD to renew OMB. The sponsor is working on updating the SSA to reflect the current burdens (such as IT system costs, etc)