

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:

Synchronized Predeployment and Operational Tracker Enterprise Suite (SPOT-ES)

2. DOD COMPONENT NAME:

Department of Defense Human Resources Activity

3. PIA APPROVAL DATE:

Defense Manpower Data Center (DMDC)

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.

The SPOT-ES consists of the Synchronized Predeployment and Operational Tracker (SPOT), the Joint Asset Movement Management System (JAMMS) and the Total Operational Picture Support System (TOPSS). Together, they provide federal agencies and Combatant Commanders with the ability to plan, manage, track, account for, monitor and report on contracts, companies and contractor employees during planning, operation and draw-down of any contingency, peacekeeping, humanitarian or disaster-recovery operation both within and outside of the United States.

SPOT is the central data repository of contract and contractor information for DoD, DoS and USAID. Other federal agencies also use SPOT as the authoritative source for this type of information. SPOT provides a standardized front-end user interface for companies to enter individual records along with logistics, operations, deployment, contract, and contact information. JAMMS/PLACO- operates as a web-based application with scanner as well as a stand-alone laptop with scanner. Both are accessed / deployed at high-density contractor service

points, e.g., Dining Facilities (DFAC) or Aerial Ports of Debarkation (APOD). JAMMS/PLACO scans identity credentials (e.g., Common Access Card (CAC) and LOA), to collect person, date, time, and location data. Lastly, TOPSS uses the information stored in SPOT to provide business intelligence, a common operating picture, and a reporting tool for Government users and certain contractors directly supporting Government offices. TOPSS aggregates data from SPOT to build a single virtual entity using advanced analytics to produce widgets, standard and ad hoc reports, customizable geospatial mapping of data points and trend analysis.

The personal information collected, maintained and reported in SPOT-ES includes: first name, last name, middle name, social security number, DoD ID Number, date of birth, sex, contact information, and contract information. Joint Asset Movement Management System/ Personnel Location And Check-in Online.

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 intended use of PII is collected to afford federal agencies and Combatant Commanders the ability to plan, manage, track, account for, monitor and report on contracts, companies and contractor employees supporting contingency operations, humanitarian assistance operations, peace operations, disaster relief operations, military exercises, events, and other activities that require contractor support within and outside the U.S.

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.

Data collection on contractors is a condition of their contract when DFARS 225.252-7040 is incorporated per DoD direction. Persons who choose not to have the data collected will not be entitled to DoD employment opportunities.

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.

Information in SPOT-ES is collected by the employer rather than directly from the individual. Other employees who also work for the individual's employing company, hold 'Company Administrator' accounts in SPOT. These Company Administrators build and maintain the SPOT records. Use of the PII is required by laws and regulations that necessitate the use of the Privacy Act information for accountability and visibility of contractors deployed in support of DoD, DOS, USAID and other federal agencies.

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

SPOT-ES does not collect information directly from the individuals whose records are in the database. Rather, the information is collected by the individual's employer who provides their employees with the appropriate Employee Privacy Notice statement per their specific company policy.

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.

Other DHRA / DMDC organizations with responsibilities for deployed personnel or systems that maintain a repository of, or report on, the visibility and accountability of personnel, e.g., the Defense Enrollment Eligibility Reporting System (DEERS) and the Real-Time Automated Personnel Identification System (RAPIDS) .

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

Specify.

All Military Components and Combatant Commanders to include their contracting offices as well as government and military agencies.

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

Specify.

Department of State; U.S. Agency for International Development (USAID); Department of Interior; Department of Homeland Security; Department of Treasury; Department of Justice; Department of Health and Human Services; Environmental Protection Agency; Department of Transportation; Department of Energy; General Services Administration and other federal agencies may use the SPOT database repository to account for their Government civilian and contractor personnel when supporting contingency, humanitarian, peacekeeping and disaster relief operations both within and outside of the United States.

☒ State and Local Agencies

Specify.

Law Enforcement Agencies as approved by the Program Manager.

☒ 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 following regulations and clauses are incorporated in the SPOT-ES contract by reference. All contractors with access to SPOT, TOPSS or JAMMS must comply with these privacy safeguards:

- DFARS 252.225-7040, Contractor Personnel Supporting U.S. Armed Forces Deployed Outside the United States.
- Privacy Act of 1974 (5 U.S.C. 552a and part 24).
- U.S. Citizenship and Immigration Services (USCIS) Form I-9.
- Title 48 CFR 39.105, Privacy
- FAR 52.204-9, Personal Identity Verification of Contractor Personnel
- FAR 52.222-50, Combating Trafficking in Persons
- FAR 52.224-1, Privacy Act Notification
- FAR 52.224-2, Privacy Act
- FAR 52.239-1, Privacy or Security Safeguards
- DoD 5400.11-R, and DoD Directive 5400.11, DoD Privacy Program
- DoD 6025.18-R, DoD Health Information Privacy Regulation

- DoD 5200.2-R, Personnel Security Program
- HSPD-12, Homeland Security Presidential Directive
In addition, SPOT presents the 'Acknowledgment of Responsibilities of Receiving and Maintaining Privacy Act Data' each time a user logs onto SPOT and requires user's active selection of the 'I Consent' icon before allowing them to proceed with access to the application where they build and maintain the records for their deployed employees.

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

Specify.

Applicable civilian organizations, e.g., United Services Organization (USO) and first responders, to locate and account for personnel in a contingency, peacekeeping, humanitarian relief or disaster response / recovery area.

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 checked="" type="checkbox"/> Existing DoD Information Systems | <input checked="" type="checkbox"/> Commercial Systems |
| <input checked="" type="checkbox"/> Other Federal Information Systems | |

Individuals (military, Government civilians and contractor personnel), individual's employer (company or government agency), Defense Enrollment Eligibility Reporting System (DEERS), Federal information systems and commercial systems of entities supporting contingency, humanitarian assistance, peacekeeping, and disaster relief operations.

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- | | |
|---|--|
| <input type="checkbox"/> E-mail | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input checked="" type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) | |

OMB Control Number 0704-0460 identifies the Paperwork Reduction Act statistics related to the SPOT program.

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.

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.

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

(3) Retention Instructions.

PERMANENT: Keep until event (e.g., deployment terminated) occurs and then retire record to the Army Electronic Archives (AEA). AEA transfers record to the National Archives when 25 years old.

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.

10 U.S.C. 113, Secretary of Defense; 10 U.S.C. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 10 U.S.C. 2302, note, Contractors Performing Private Security Functions in Areas of Combat Operations or Other Significant Military Operations; DoD Directive 1000.25, DoD Personnel Identity Protection (PIP) Program; DoD Directive 1404.10, DoD Civilian Expeditionary Workforce; DoD Directive 3020.49, Orchestrating, Synchronizing, and Integrating Program Management of Contingency Acquisition Planning and Its Operational Execution; DoD Instruction 3020.41, Operational Contract Support (OCS); DoD Instruction 3020.50, Private Security Contractors (PSCs) Operating in Contingency Operations, Humanitarian or Peace Operations, or Other Military Operations or Exercises; DoD Instruction 6490.03, Deployment Health; Treaty of Mutual Cooperation and Security Between the United States of America and Japan, January 19, 1960; and E.O. 9397 (SSN), 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.

OMB Control Number 0704-0460, Synchronized Predeployment and Operational Tracker (SPOT) System, expires: 09/30/2025