



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Credit Card Cashless System (MICROS® 3700 and Odyssey PCS™)

US Army Medical Command - Defense Health Program (DHP) Funded System

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR Enter DITPR System Identification Number
- Yes, SIPRNET Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes
- No

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes
- No

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 3013, Secretary of the Army; Army Regulation 40-2, Army Medical Facilities General Admission; and E.O. 9397 (SSN), as amended

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

This replaces the Point of Sale (POS) Cashless System (MICROS® 3700 and Odyssey PCS™) PIA approved in 2012. A new component was added to this system and it is addressed below.

The CBORD® Group, Inc., Point of Sale (POS) System, incorporates several commercial products that facilitate cashless transactions for retail services to include cafeteria dining. The MICROS® 3700 offers robust credit card, point-of-sale and back-office operations, flexible reporting, and real-time business intelligence to increase efficiency, speed service and provide a better experience for the customers. It maintains all pricing, food menus, and sales data. The Odyssey PCS™ electronically tracks sales when customers (employees) use the pre-paid charge card associated with this application. The MICROS 3700 directly interfaces with the Odyssey PCS to enable real-time validation of the customer's declining balance on the pre-paid charge card. The pre-paid charge cards have numerical designations and are not associated with a specific individual.

Payment Card Industry (PCI) Data Security Standard (DSS). The PCI Credit card processing component has been added to this system. This allows the customer to pay for meals using credit cards via the medical treatment facility (MTF) network. Patrons can now use major credit cards to pay for meals eaten at the MTF dining facility. Prior to using credit cards, customers had to pay for meals with cash or the pre-paid charge card associated with this POS. The usage of credit card increases productivity and flexibility of this system. Payment transactions are accepted or denied and the patron receives their meals when approved by PCI/ DSS compliance. No credit card data is stored on the MICROS 3700 Server.

The only personal information about individuals collected are the names of the cash register operators. The cash register operator's name is used to create a numeric password to login and operate the cash registers.

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

The privacy risks associated with the PII collection are unauthorized access, inaccurate information in the system, and unauthorized disclosure of PII. There are security measures in place to mitigate these risks. The security measures are addressed in Section 3d below.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

CBORD'S Group, Inc., (contracting company) -
Language in contract: "The contractor and its employees shall become familiar with and adhere to the provisions of the Privacy Act and Health Insurance Portability and Accountability Act (HIPAA). The contractor shall keep in the strictest confidence any information obtained during the performance of work at project sites or furnished by the Government, such information being the sole property of the Government."

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

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Cash register operators will verbally give their names to the system administrator for this solution. The Privacy Act Statement is read to them and they are given an opportunity to object to the collection of their PII. Individuals who object to the collection of their PII will result in being assigned a random number instead of using their name.

(2) If "No," state the reason why individuals cannot object.

j. 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.

Cash register operators will verbally give their names to the system administrator for this solution. The Privacy Act Statement is read to them and they are given an opportunity to object to the collection of their PII. Individuals who object to the collection of their PII will result in being assigned a random number instead of using their name.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

AUTHORITY: 10 USC 3013 and EO 9397
PRINCIPLE PURPOSE: To create a computer application account for cash register use.
ROUTINE USE: Information you provide will be used by Nutrition Care Division staff to account for food purchases made by customers of the facility.
DISCLOSURE: Furnishing of information is voluntary; however, failure to provide required information will result in being assigned a random number instead of using your name.