

## 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:**

Online Base of Information Widely Accessible over Network (OBIWAN)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

03/20/23

Program Executive Office (PEO) Medical Systems (J-6)

### 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.**

Online Base of Information Widely Accessible over Network (OBIWAN) is a website hosting platform which provides Microsoft SharePoint availability as part of its ongoing 24 x 7 operations to sites for centralized secure data library activities. The purpose of the SharePoint Enterprise environment is to provide a single platform for the standardization of hosting and management of Defense Health Agency (DHA) websites. The SharePoint platform provides multiple capabilities to meet the diverse mission needs of the users of the system such as content management, document management, file management, collaboration spaces, enterprise class search, business intelligence tooling, business process automation, as well as supporting custom solutions. The multi-purpose platform allows for managing and provisioning of intranet and extranets. In this case, it hosts internal sites for Navy Medicine enclaves (intranets) and Army Medicine enclaves (intranets), as well as sites for intra-service collaboration between DHA members (extranet) and Military Treatment Facilities (MTFs). OBIWAN virtual assets are hosted at Microsoft Azure Government (Gov) Cloud (eMASS ID 2819). The virtual assets utilize the Medical Community of Interest (MedCOI) Compute and Storage Management Services (CSMS) infrastructure (eMASS ID 386). OBIWAN is connected to the Department of Defense Information Network (DoDIN) formerly known as the Global Information Grid (GiG).

The unclassified OBIWAN operates within Microsoft Azure Infrastructure as a Service (IaaS) Cloud system and provides a consolidated environment for authorized Department of Defense (DoD) Common Access Card (CAC) and Veterans Affairs (VA) users with Personal Identity Verification (PIV) for the purpose of collaboration and content management needs. OBIWAN is an integrated service covered by the Collaboration Pathfinder With Cloud Service Provider (CSP) Authority To Operate (ATO). As part of its collaboration and content management offerings, the OBIWAN SharePoint platform provides users the opportunity to collect and/or store Personally Identifiable Information (PII); however, OBIWAN does not serve as the initial point of collection for any PII provided to the platform by its customers.

The following categories of individuals from which PII is collected includes Active Duty Service Members, National Guard personnel, Reserve personnel, members of the general public, and Federal employees. OBIWAN does not serve as the initial point of collection for PII. The primary responsibility for determining what PII elements are to be collected and stored lies with the primary DoD component, MTF, or Federal Agency where PII is initially collected and primarily maintained.

OBIWAN is owned and managed by the DHA Solution Delivery Division (SDD) and Web and Mobile Technology (WMT) Program Management Office (PMO).

**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)

PII is collected for mission-related and administrative purposes. The intended use of the PII collected is to allow users to engage in content management, document management, file management, enterprise class search, business intelligence tooling, business process automation, and to utilize collaboration spaces.

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 do not have the opportunity to object to the collection of their PII because OBIWAN is not the initial point of collection.

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 do not have the opportunity to consent to the specific use of their PII because OBIWAN is not the initial point of collection.

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

OBIWAN does not collect PII directly from individuals; therefore, no Privacy Act Statement or Privacy Advisory is required.

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. DHA MTFs; Participating DHA Subcomponents
- Other DoD Components (i.e. Army, Navy, Air Force) Specify. Departments of the Army, Navy (Marines), and Air Force (Space Force)
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) Specify. Department of Veterans Affairs  
Department of Homeland Security (US Coast Guard)
- 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.
- 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

Existing DoD Information Systems: OBIWAN MTFs determine which systems PII is to be collected from.

Other Federal Information Systems: OBIWAN MTFs determine which systems PII is to be collected from.

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)

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.

A system of record notice ("SORN") is not necessary because Online Base of Information Widely Accessible over Network ("OBIWAN") is merely a website hosting platform and only OBIWAN customers determine the collection of personally identifiable information ("PII"). Nonetheless, OBIWAN does not constitute a system of records since there is no actual retrieval of information by a 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.       Scheduled       **Unscheduled**

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

(3) Retention Instructions.

**Unscheduled - Permanent.** Treat system and/or records maintained in the system as permanent until a NARA approved schedule and disposition authority has been applied.

**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.

Authorities include: 5 U.S.C §301 "Departmental Regulations"; 10 U.S.C §142 "Chief Information Officer"; 40 U.S.C §11315 "Agency Chief Information Officer"; 44 U.S.C §3506 "Federal Agency Responsibilities"; and 44 U.S.C §3554 "Federal Agency Responsibilities." Additional authorities to collect information are specific to the information systems or electronic collections of OBIWAN's customers and addressed in the privacy impact assessment for those respective information systems and electronic collections.

**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.

OBIWAN is exempt from Paperwork Reduction Act (PRA) requirements per DoDM 8910.01, Volume 2, Enclosure 3, Section 8(b11): "Collections of information from DoD civilian employees within the scope of their employment (includes all the tasks performed to accomplish the job they perform for the OSD or DoD Component), unless the results are to be used for general statistical purposes."