

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:

Entellitrak (ETK) Equal Employment Opportunity Case Management System

2. DOD COMPONENT NAME:

Department of Defense Inspector General

Office of Equal Employment Opportunity (OEEO)

3. PIA APPROVAL DATE:

06/16/2026

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.)

- | | |
|---|--|
| <input type="checkbox"/> From members of the general public | <input type="checkbox"/> From Federal employees |
| <input checked="" type="checkbox"/> from both members of the general public and Federal employees | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

b. The PII is in a: (Check one.)

- | | |
|--|---|
| <input type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input checked="" type="checkbox"/> Existing DoD Information System | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 DoD OIG OEEO utilizes ETK as a case management information system. ETK is an enterprise-level commercial off-the-shelf application hosted by a third-party service provider. ETK provides the capability to create cases, track case logs and regulatory time frames, monitor trends, and report on discrimination complaint cases. The system uses a web-based interface to capture data and to produce reports. ETK provides for the timely administrative process and adjudication of each complaint.

The system contains information pertaining to applicants and current or former employees who file a formal or informal EEO complaint. Personally identifiable information (PII) is collected to support complaint processing and adjudication. PII may include full name, work information, home address, email address, telephone number, and other identifying information relevant to the complaint.

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)

ETK does not collect information directly from an individual. Individuals begin the complaint process by completing and submitting IG Form 1020.01, Formal Complaint of Discrimination. The information is then entered into ETK by an OEEO employee and is used to manage the processing and adjudication of each complaint.

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 involved are notified through completion of IG Form 1020.01 that they are voluntarily providing PII to support the processing and adjudication of their complaint.

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 voluntarily provide PII and have the right to stop the complaint process at any time. However, if an investigation is initiated or civil litigation ensues, the PII can be shared as necessary in accordance with the routine uses listed in the applicable system of records notice.

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.)

- | | | |
|--|---|--|
| <input type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory | <input checked="" type="checkbox"/> Not Applicable |
|--|---|--|

A PAS is not required as ETK does not request information directly from an individual.

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)

- | | |
|---|--|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. DoD OIG employees with a verified need-to-know. |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Sharing is consistent with 5 USC 552a(b), Conditions of Disclosure, and the routine uses listed in SORN EEOC/GOVT-1. |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Sharing is consistent with 5 USC 552a(b), Conditions of Disclosure, and the routine uses listed in SORN EEOC/GOVT-1. |
| <input checked="" type="checkbox"/> State and Local Agencies | Sharing is consistent with 5 USC 552a(b), Conditions of Disclosure, and the routine uses listed in SORN EEOC/GOVT-1. |
| <input checked="" type="checkbox"/> 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. FAR Privacy Clauses 52.224-1, Privacy Act Notification, -2, Privacy Act, and -3, Privacy Act Training apply. Enterprise Technology Solutions, Inc, contract includes FAR clause 52.224-3, Privacy Act Training. |
| <input type="checkbox"/> 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)

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

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

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

IG Form 1020.01, Formal Complaint of Discrimination.

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 EEOC/GOVT-1.

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcltd.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. 1. DAA-GRS-2018-0002-0012; 2. DAA-GRS-2018-0002-0013.

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

(3) Retention Instructions.

1. Destroy 3 years after cutoff (close of case) -- Longer retention is authorized if required for business use.
2. Destroy 7 years after cutoff (close of case) -- Longer retention is authorized if required for business use.

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.

29 USC 701, Rehabilitation Act of 1973, Sections 501 and 505;

29 CFR 1614, Federal Sector Equal Employment Opportunity;

29 CFR 1620, Equal Pay Act of 1963, as amended;

29 CFR 1625, Age Discrimination in Employment Act of 1967, as amended;

Public Law (PL) 88-352, Civil Rights Act of 1964, as amended;

PL 92-261, Equal Employment Opportunity Act of 1972;

PL 110-233, Genetic Information Nondiscrimination Act of 2008, Title II;

DoD Directive 1440.1, The DoD Civilian Equal Employment Opportunity (EEO) Program;

DoD Instruction 1400.25, Volume 1614, DoD Civilian Personnel Management System: Investigation of Equal Employment Opportunity (EEO) Complaints;

Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715, Instructions for Model EEO Programs; and

IG Instruction 1020.1, Processing Complaints of Discrimination.

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.

3150-0259.