

## 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:**

Global Teleconsultation Portal

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/07/23

Virtual Health Program Management Office (VH PMO)  
Component Acquisition Executive (CAE)

**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.**

Global Teleconsultation Portal is Defense Health Agency's enterprise asynchronous (store & forward) platform used for provider-to-provider teleconsultation and when required, aeromedical evacuation case management. Currently hosted in the Military Assistance Advisory Group at Navy Medical Center San Diego, Global Teleconsultation Portal utilizes major hub sites at Tripler Army Medical Center, Navy Medical Center Portsmouth, Navy Medical Center San Diego, and Landstuhl Regional Medical Center. The Global Teleconsultation Portal website enables remote providers to submit patient demographics, clinical data, and supplementary multimedia as dictated by the clinical scenario. The system collects personally identifiable information and protected health information (PII/PHI) such as home or cell phone numbers, mailing or home addresses, race or ethnicity, work e-mail address, birth date, personal e-mail address, position or title, rank or grade, DoD ID number, gender or gender identification, and medical information. Consults are screened by physician managers and forwarded to appropriate specialists for input. Patient movement requests are coordinated by both administrative and clinical personnel to ensure efficient, cost-conscious case management. All case discussion is done on the web-based platform, with notification of new case activity via email. Global Teleconsultation Portal is designed to be a worldwide-accessible, secure, web-based system for health care personnel (Independent Duty Corpsman, Registered Nurses, Nurse Practitioners, Physician Assistants, Physicians) allowing them access to medical specialists. Global Teleconsultation Portal requires only a web browser with minimal internet bandwidth and the lightweight nature of Global Teleconsultation Portal uniquely allows it to be utilized at every treatment level. Global Teleconsultation Portal is not utilized as a final health record maintaining system, health information is uploaded into the Healthcare Artifact and Image Management Solution.

**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)

User account information is collected for authentication to GTP and for identification/accountability within the system.

Patient information is gathered for the purpose of clinical consultations and/or patient movement coordination.

Patients do not have accounts within GTP. This system is only accessed by health care personnel and clinical support staff.

**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.

Global Teleconsultation Portal is not the initial point of collection of patient Personally Identifiable Information and Protected Health Information. Therefore, the opportunity to object to the collection of information occurs prior to entry into Global Teleconsultation Portal. The information is manually input by health care personnel or clinical staff. All information is manually input by health care personnel or clinical staff.

**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.

Global Teleconsultation Portal is not the initial point of collection of Patient Personally Identifiable Information and Protected Health Information.

**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

Global Teleconsultation Portal is not the initial point of collection of Patient Personally Identifiable Information and Protected Health Information. Therefore, the Privacy Act Statement (PAS) and/or Privacy Advisory is not 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. DoD Medical Treatment Facilities
- Other DoD Components (i.e. Army, Navy, Air Force)                      Specify. Army, Navy, Air Force, Coast Guard
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)                      Specify. US Department of State
- 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

The information is manually input by a health care personnel or clinical staff. The information is obtained by the provider or other systems such as Armed Forces Health Longitudinal Technology Application or Military Health System Genesis.

**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)

The information is manually input by providers or their clinical staff and obtained from other sources such as Armed Forces Health Longitudinal Technology Application or Military Health System Genesis.

**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://dpclid.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.

Global Teleconsultation Portal is not a system of record. Therefore does not require a System of Records Notice.

**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. GRS 5.2, item 020 (DAA-GRS-2017-0003-0002)

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

(3) Retention Instructions.

FILE NUMBER: 103-14

DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate).

**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., Ch. 55, Medical and Dental Care; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. Ch. 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; DoD Manual 6025.18, Implementation of the Health Insurance Portability and Accountability Act Privacy Rule in DoD Health Care Programs

**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.

An Office of Management and Budget Control Number is not required because the system is not the entry point for all the information collected and the other data is collected through non-standardized methods.