

## 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:**

Draeger Infinity M300 VG2.x\_AI

**2. DOD COMPONENT NAME:**

Defense Health Agency

Cyber Logistic

**3. PIA APPROVAL DATE:**

09/21/23

### 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 Draeger Infinity M300 VG2.x\_AI (Draeger M300) is a patient-worn transceiver that uses the Infinity Central Station (ICS) as the primary patient monitoring display and primary alarm source. The M300 provides continuous ambulatory monitoring for the following parameters: Electrocardiogram (ECG) including heart rate, arrhythmia, and ST segment analysis. Pulse oximetry including peripheral capillary oxygen saturation (SpO2), pulse plethysmogram waveform, and pulse rate. The Draeger M300 has the following connection ports; ECG lead connector and a SpO2/Aux port. The data is exchanged via two-way wireless communication between the M300 and Infinity Central Station. Internal traffic only on the separate Infinity virtual local area network (VLAN) enclave. The Draeger Infinity M300 communicates with Infinity® Central Station and Infinity® R50N strip recorder. There are no externally connected systems. The hardware components of the system are the Draeger M300 medical device, a bedside charger, a central charger and a programming kit.

The categories of individuals with records in this system are Department of Defense (DoD) health care beneficiaries to include Military members of the Armed Forces, Military retirees, and their family members as well as other categories of individuals eligible to receive medical care at DoD medical treatment facilities.

The Draeger Infinity M300 receives, processes, stores, transmits and displays PII data from both members of the general public and Federal employees. All data is received and transmitted only on the separate Infinity VLAN enclave. The M300 processes physiological patient data without identification. The PII collected: Patient Name, Patient ID, Patient Category, Date of Birth, Admit Date, Gender, and Pacemaker Type.

The Draeger Infinity M300 is owned and operated by the DHA sites who purchase the workstation.

**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 from the Draeger Central Station (ICS) to match patient to the test to be performed. The intended use of the PII is to verify and monitor patient data for continuous patient care.

**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.

The Draeger Infinity M300 VG2.x\_AI is not the initial point of collection of PII, therefore, individuals do not have an opportunity to object to the collection of their PII.

**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.

The Draeger Infinity M300 VG2.x\_AI is not the initial point of collection of PII, therefore, individuals do not have an opportunity to consent to the specific use of their PII.

**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

The Draeger Infinity 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 Military Treatment Facilities (MTF)s
- Other DoD Components (i.e. Army, Navy, Air Force)                      Specify.
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)                      Specify.
- 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

Infinity Central Station (ICS)

**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://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.

A system of records notice ("SORN") is not required because it is not a system of records as it does not actually retrieve collected and stored information, if any, by an individual's name or other identifying particular assigned to the individual.

**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; 10 U.S.C. 1073c, Administration of Defense Health Agency and Military Medical Treatment Facilities.

**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.

The information collected in this system is for the diagnosis and treatment of medical disorders and is not considered a public information collection in accordance with DoDM 8910.01, V2, Encl 3 8b(5)