

## PRIVACY IMPACT ASSESSMENT (PIA)

#### For the

Military Health System (MHS) Learn	
Defense Health Agency (DHA)	

### **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.
$\boxtimes$	(3)	Yes, from both members of the general public and Federal personnel and/or Federal contractors.
	(4)	No

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.

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<sup>\* &</sup>quot;Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

## **SECTION 2: PIA SUMMARY INFORMATION**

a.	a. Why is this PIA being created or updated? Choose one:							
		New DoD Information	tion System			New Electror	nic Collection	
	$\boxtimes$	Existing DoD Info	rmation System	1		Existing Elec	tronic Collection	
		Significantly Modi	fied DoD Inforr	nation				
b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?								
	$\boxtimes$	Yes, DITPR	Enter DITPR S	System I	den	tification Number	130 (DMHRSi)	
		Yes, SIPRNET	Enter SIPRNET Identification Number			ion 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?							
	$\boxtimes$	Yes		r	No			
	If "Y	es," enter UPI	UII:	UII: 007-000000611 (DMHRSi)				
		If unsure,	consult the Com	ponent I	IT B	udget Point of Con	tact to obtain the UPI.	
<ul> <li>d. Does this DoD information system or electronic collection require a Privacy Act System of Records Notice (SORN)?</li> <li>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 <u>retrieved</u> by name or other unique identifier. PIA and Privacy Act SORN</li> </ul>								
		nation should be consis		evea by i	name	e or other unique la	enulier. PIA and Privacy	ACI SORN
	$\boxtimes$	Yes			No			
	If "Yes," enter Privacy Act SORN Identifier EDHA 11							
	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 a Consult the C	approval to Deformation					

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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.  $\boxtimes$ Yes 0720-0041 **Enter OMB Control Number** 03/31/2015 **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; DoDI 1322.24 (Military Medical Readiness Skills Training); and E.O. 9397 (SSN), as amended.

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.

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# 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.

The purpose of MHS Learn is to provide the military medical workforce, veterans, and family member population with a centralized comprehensive online solution for medically related training activities through a web-based platform. Today's forces must be trained effectively and rapidly, regardless of being stationed at home, overseas, or in a theater of operations. This enterprise-level learning portal integrates training into the workplace or home with standardized training programs to advance the Military Health System's (MHS) most critical resource — it's people (to date, over 165,000 registered learners have completed over 2.4 million lessons).

MHS Learn provides the following benefits to the Department of Defense (DoD) and its users:

- Centralization a single source for training; an extensive library of web courses available, including clinical, regulatory, application, beneficiary / consumer, and professional development courses; 24x7 access from anywhere; and accreditation and certification.
- Sharing a training partnership between the Department of Veteran Affairs (VA) and DoD; an optimized distributed learning architecture; sharing of continuing education and in-service training programs; and sharing of education between TRICARE Online (TOL) and My HealtheVet portals.
- Collaboration facilitated non-traditional learning events; virtual classrooms; webinar sessions; self-paced courses; classroom chats; discussion forums; event scheduling; and online help.
- Support tracking and reporting; custom content development; training implementation and migration; compliance with DoD standards, Instructional Systems Design (ISD), Sharable Content Object Reference Model (SCORM); and integration with Defense Medical Human Resources System Internet (DMHRSi). Defense Health Agency (DHA) owns and operates MHS Learn. MHS Learn is readily accessible via the web and is fully deployed.

MHS Learn collects and stores personally identifiable information (PII) via the self-registration and course registration process, including the following data elements:

- Name
- Social Security Number (SSN)
- Foreign National ID
- Electronic Data Interchange Personal Identifier (EDIPI)
- Personal cell telephone number
- Home telephone number
- Personal e-mail address
- Employment information
- Military records
- Education information
- Other (birth month, Defense Switched Network (DSN), username, password, password challenge question and response)

Note: No beneficiary, treatment, or clinical records are collected, maintained, transmitted, or stored in the system.

PII elements are used for identification in both input and output transactions. This practice is driven by the lack of unique identifiers in the external systems to which MHS Learn interfaces. The PII elements that are used typically are some combination of SSN, full name, and month of birth.

Data is collected for the following categories of individuals:

- DoD Active Duty
- Reservists
- National Guard
- Federal Civilians

Contractors

Volunteer Personnel

Continental United States (CONUS) MHS Service Desk Contact Information:

Phone: (800) 600 - 9332 Website: mhslearn.csd.disa.mil E-mail: mhssc@timpo.osd.mil

Outside of Continental United States (OCONUS) MHS Service Desk Contact Information:

Phone: (866) 637-8725

Note: additional OCONUS Access Numbers are available upon request.

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

Privacy risks may include, but are not limited to, the following:

- Distribution of PII to an incorrect user:
- Incorrect password reset;
- · Linking of log in ID to wrong account; and
- Criminal wrongdoing or misconduct.

In accordance with the DoD 5400.11-R, "Defense Privacy Program," May 14, 2007, whenever a MHS Learn user and/ or MHS Learn support personnel becomes aware of an actual or possible loss of control, unauthorized disclosure, or unauthorized access of personal information where persons other than authorized users gain access or potential access to such information for an other than authorized purpose where one or more individuals will be adversely affected, MHS Learn will:

- Notify appropriate leadership personnel within the MHS Learn Program Office immediately;
- Report to the United States Computer Emergency Readiness Team within one hour of breach discovery;
- Report to the DHA Privacy and Civil Liberties Office within 24 hours at PrivacyOfficerMail@dha.mil; and
- Notify all affected individuals within 10 working days after the loss, theft, or compromise is discovered and the identities of the individuals ascertained, if necessary.
- 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. DHA; DMHRSi

Other DoD Components.

Specify.

Defense Manpower Data Center (DMDC) Defense Enrollment Eligibility Reporting System (DEERS)

Navy Training Management and Planning System (NTMPS) – all training completion data for all Navy personnel registered in MHS Learn will be sent via secure Fast File Transfer Protocol (FFTP) on a weekly basis to NTMPS. This data is required and incorporated into the Navy Service personnel training record.

Army Medical Detainee Course training completion data is shared with the Army Office of the Surgeon General on a biweekly basis.

Training completion data will also be provided to the Army Medical

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		Department (AMEDD) C&S.								
	$\boxtimes$	Other Federal Agencies.								
		Specify.	VA eBenefits Portal							
		State and Local Agencies.								
		Specify.	pecify.							
	$\boxtimes$	Contractor	(Enter name and describe the language in the contract that safeguards PII.)							
		Specify.	CGI (Application Support) Planned Systems International (PSI) (Code Maintenance)							
			All contracts contain language which require the contractor to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule and the HIPAA Security Rule. In addition, the contractor is required to comply with the Privacy Act of 1974, as amended.							
	Other (e.g., commercial providers, colleges).									
		Specify.								
i.	Do i	individuals	have the opportunity to object to the collection of their PII?							
	$\boxtimes$	Yes	□ No							
	(	(1) If "Yes,"	describe method by which individuals can object to the collection of PII.							
	An individual may refuse to register in MHS Learn and provide their PII. In that event, alternate training access may be provided. In some instances, however, access to clinical systems may be denied if certain training (e.g., HIPAA and Privacy Act training) is not completed in MHS Learn.									
	(2) If "No," state the reason why individuals cannot object.									
j.	Do ir	ndividuals h	ave the opportunity to consent to the specific uses of their PII?							
	$\boxtimes$	Yes	□ No							

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(1) If "Yes," describe the method by which individuals can give or withhold their consent.

	se Privacy Program, C.4.1.3.		ary in accordance with DoD 5400.11-R, Department
(2) If "	F"No," state the reason why individuals	can	not give or withhold their consent.
	rmation is provided to an individual	whe	en asked to provide PII data? Indicate all that
oply.	vacy Act Statement	٦	Privacy Advisory
☐ Other	_	]	None
each	via the MHS Learn web site. Because M	HS L	als when they register for an MHS Learn user account earn is a system of record and PII is collected by MHS Statement is necessary, as follows:
ioiiiat.	This statement serves to inform you of the Military Health System (MHS) Learn and		rpose for collecting personal information required by the it will be used.
	AUTHORITY: 5 U.S.C. 301, Department and E.O. 9397 (SSN), as amended.	al Re	egulations; DoDI 1322.24, Medical Readiness Training;
			viduals to verify the identity of eligible users of the MHS Federal and Department mandated training.
	ROUTINE USES: In addition to those dis		ures generally permitted under 5 U.S.C. 552a(b) of the ment of Defense "Blanket Routine Uses" under 5 U.S.C.
	Privacy Act of 1974, as amended, the De	ne Of	ffice of the Secretary of Defense compilation of systems
	Privacy Act of 1974, as amended, the De 552a(b)(3) set forth at the beginning of the of records notices apply to this collection	he Of n. ure to	provide the requested information will result in denial of
	Privacy Act of 1974, as amended, the De 552a(b)(3) set forth at the beginning of the of records notices apply to this collection DISCLOSURE: Voluntary: however, failure.	he Of n. ure to	provide the requested information will result in denial of

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#### NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.

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