



PRIVACY IMPACT ASSESSMENT (PIA)

For the

DoD Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS)

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.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

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.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR** Enter DITPR System Identification Number
- Yes, SIPRNET** Enter SIPRNET Identification 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?

- Yes**
- No**

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes**
- No**

If "Yes," enter Privacy Act SORN Identifier

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 approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

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.

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

Enter OMB Control Number

0720-0030 - with OMB for review/approval for extension

Enter Expiration Date

9/30/2016* (see above)

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.

10 U.S.C. 1060a, Special supplemental food program; 42 U.S.C. Chapter 13A, Child Nutrition; 7 CFR Part 246, Special Supplemental Nutrition Program for Women, Infants and Children; 32 CFR 199.23, Special Supplemental Food Program; HA Policy 09-004, Policy Memorandum for Women, Infants, and Children Overseas Program; and E.O. 9397 (SSN), as amended.

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 Department of Defense (DoD) is responsible for providing Women, Infants, and Children (WIC) benefits to eligible members of the Armed Forces, civilian employees, DoD contractors, and their family members, living overseas. The program provides eligible participants with supplemental nutritious food, nutrition counseling and education, nutrition-health screening, and referrals to other health agencies.

The purpose of the Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS) Information System (IS) is to automate the processes used to determine eligibility for the DoD WIC Overseas program and administer participant benefits. The WIC PIMS IS employs automated, physical, and system safeguards designed to ensure availability, authentication, confidentiality, integrity, and non-repudiation.

Personally identifiable information (PII)/protected health information (PHI) collected by the WIC PIMS IS includes name, gender, date of birth, truncated Social Security Number (SSN), race/ethnicity, marital status, spouse information, child information, mailing address, telephone number, medical notes, e-mail address, military status, and other personal data including household income, education information, nutritional/medical data which includes anthropometric (length or stature and weight), biochemical data (hematocrit or hemoglobin), and dietary data. Medical history data includes such items as pregnancy history, food allergies, medical conditions (i.e., asthma, diabetes, lactose intolerance, etc). The PII collected pertains to the following categories of individuals: members of the Armed Forces, civilian employees, and DoD contractors living overseas, and their family members who apply for benefits in the DoD WIC Overseas program.

The system is owned by the DHA, TRICARE Health Plan Division, and operated by WIC Overseas, Choctaw Staffing Solutions. Information regarding the WIC Overseas Program can be obtained from <http://www.tricare.mil/wic>, by email at wicoverseas@wicoverseas.net, or by standard mail at the address listed below:

WIC Overseas Program Manager
Choctaw Staffing Solutions
70 North East Loop 410, Suite 400
San Antonio, Texas 78216
Phone Number: 210-341-3336 ext. 218
Toll free: 877-267-3728
Fax: 210-525-1398

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

The potential privacy risk regarding the collection, use, and/or sharing of PII/PHI by the WICPIMSIS are identity theft and disclosure of limited personal health information. To reduce this risk, administrative, physical and technical controls have been developed and implemented for the WICPIMSIS.

To access the WICPIMSIS, all WICOverseas employees must be U.S. citizens and possess at least an ADP/IT-II Position of Trust while the Director, Information Management/Information Technology for WICOverseas requires an ADP/IT-I Position of Trust.

WICOverseas maintains cybersecurity, PII protections, and security postures as outlined by current Defense Information Systems Agency (DISA) Security Technical Information Guides (STIG) and Security Requirement Guides (SRG). As part of the cybersecurity assessment process, an Incident Response Plan is submitted and reviewed for completeness and applicability. The Incident Response Plan addresses identification of, and response to, security breaches involving PII/PHI.

The WICPIMSIS received an Authorization to Operate (ATO) under the DoD Information Assurance Certification and Accreditation Process (DIACAP) policy set on September 26, 2016. WICOverseas is transitioning to the Risk

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.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

Other (e.g., commercial providers, colleges).

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

Yes **No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Individuals can object to collection of PII/PHI by not providing the required information during the application process. A Privacy Act Statement is provided prior to completing an application for the WIC Overseas Program.

(2) If "No," state the reason why individuals cannot object.

j. 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.

Individuals are given the opportunity to consent to the uses of their PII/PHI during the application process. Participants are also given the opportunity to consent to the release of their PII/PHI to other WIC agencies by means of the "Authorization to Release Information" flag in the PIMS application; the flag is set to "Yes" or "No" according to the participant's preference. PII/PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, DoD Health Information Privacy Regulation. Individuals are informed of these uses and are given the opportunity to restrict the use of their PII/PHI based on the procedures in place in accordance with DoD 6025.18-R, C10.1.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

Privacy Act Statement **Privacy Advisory**
 Other **None**

Describe each applicable format.

The following Privacy Act Statement is provided to each applicant prior to applying for WIC Overseas Program benefits. The statement serves to inform individuals of the purpose for collecting personal information required by the WIC Overseas Program and how that information will be used.

Privacy Act Statement

This statement serves to inform you of the purpose for collecting personal information required by the Women, Infants, and Children (WIC) Overseas Program and how it will be used.

AUTHORITY: 10 U.S.C. 1060a, Special supplemental food program; 42 U.S.C. Chapter 13A, Child Nutrition; 7 CFR Part 246, Special Supplemental Nutrition Program for Women, Infants and Children; 32 CFR 199.23, Special Supplemental Food Program; HA Policy 09-004, Policy Memorandum for Women, Infants, and Children Overseas Program; and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to determine if you or your family members are eligible for the Women, Infants and Children (WIC) Overseas Program and to deliver those services if you or your family members are eligible to participate.

ROUTINE USES: Use and disclosure of your records outside of DoD may occur in accordance with 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. This may include disclosures to federal, state, local, or foreign agencies to investigate or pursue potential breaches of law or regulation and to

protect national security; to the Department of Justice for representing the DoD in litigation; to a congressional office when the request is made on behalf of the individual; to the National Archives and Records Administration for records management purposes; and to other non-DoD entities when disclosure is reasonably necessary to prevent or mitigate a data breach.

SYSTEM OF RECORDS NOTICE: The appropriate system of records notice for WIC PIMS is EDHA 10, DoD Women, Infants, and Children Overseas Participant Information Management System (April 09, 2014, 79 FR 19582), published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570675/edha-10/>.

DISCLOSURE: Voluntary: however, your failure to provide the requested information may affect you or your family members' ability to enroll in, or receive services from, the WIC Overseas Program.

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.