

## 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 Innovian Anesthesia

**2. DOD COMPONENT NAME:**

Defense Health Agency

Cyber Logistics COE

**3. PIA APPROVAL DATE:**

06/05/23

### 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.**

Draeger Innovian Anesthesia provides comprehensive data management for the anesthetist. Innovian Anesthesia resides on a dedicated server in the Medical Treatment Facility (MTF) that assembles patient information and their related anesthesia records. Patient records and demographic information is received through the Surgery Scheduling System (S3), when installed at the MTF, or is manually entered by hospital staff in advance of the Operating Room (OR) procedure. The Innovian Anesthesia device captures and manages anesthesia vital sign information in the OR environment. This device also informs the operator of anesthesia standards and it automates the procedures for assembling information in required data fields, recording time stamps and electronic signatures, and providing a comprehensive record of the OR event.

The mission of Innovian Anesthesia is to contribute to more effective medical care throughout worldwide MTFs. The device establishes and maintains a master record of all the critical activity within the OR environment. That data can be utilized for OR event reconstruction, for monitoring trends in anesthesia and for maintaining standards of care.

Innovian Anesthesia will be used to collect data about individuals in accordance with the mission of each MTF. This can vary by location and may include active duty, dependents, retirees and/or their dependents, contractors, foreign nationals, former spouses, reservist, and National Guard personnel.

Personally Identifiable Information (PII) Collected: Citizenship, personal information, Department of Defense Identification (DoD ID) Number, Emergency Contact, Gender, Legal Status, Medical Information, Protected Health information (PHI), Marital Status, Home/Cell Phone, Mailing Address, Race/Ethnicity, Social Security Number (SSN): There is only historical SSN data stored in the system, SSN are no longer collected.

The information owner of the Innovian Anesthesia system is the Cyber Logistics program office.

**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)

The PII is assembled to verify patient eligibility for healthcare at the MTF. The PII also confirms identity of patient that is scheduled for treatment in the OR, assists with matching data needed for effective patient management by the anesthetist in the OR, and managing post operative care of the patient.

**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.

Submission of information is voluntary. Military Treatment Facility Admission processes contain patient admission forms that include detailed PII/PHI discussion. By agreeing to an appointment or treatment/procedure, the individual is providing implied consent. If an individual chooses not to provide their information, comprehensive health care services may not be possible, the individual may experience administrative delays, and the individual may be rejected for service or an assignment. Under the HIPAA Privacy Rule certain information is required in the course of treating the patient, in order to identify the patient and document treatment. The HIPAA privacy rules do not require that a patient have an opportunity to object to or consent to the use of their information for treatment, payment, or health care operations. Treatment is not subject to the minimum necessary rules.

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.

Consent to the specific uses of PII is obtained as necessary, in accordance with DoD 5400.11-R, DoD Privacy Program, C4.1.3. PHI is collected for permitted use and disclosures as set forth in DoD Manual 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs. Individuals are informed of these uses and are given the opportunity to restrict the use of their PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DoD Manual 6025.18. For uses other than treatment, payment and healthcare operations, individuals can authorize the use of their PHI by submitting Department of Defense (DD) Form 2870 and can request restrictions on the use of the PHI by submitting DD Form 2871 Request to Restrict Medical and Dental 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

AUTHORITY: Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 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; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD Manual (DoDM) 6025.18, "Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs;" and E.O. 9397 (SSN), as amended.

PURPOSE: The MHIS collects and maintains data that supports benefits determination for Military Health System (MHS) beneficiaries between DoD, Department of Veterans Affairs (VA), and Department of Health and Human Services (HHS) healthcare programs.

ROUTINE USE: Disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended

DISCLOSURE: Voluntary - If an individual chooses not to provide their information, comprehensive health care services may not be possible, the individual may experience administrative delays, and the individual may be rejected for service or an assignment.

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. Defense Health Agency (DHA) MTF    |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. Army, Navy, Air Force, Space Force |
| 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)

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

PII will be collected from the Composite Health Care System (CHCS), Surgical Scheduling System (S3), and/or beneficiaries and their sponsors by MTF staff, when required.

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

- |  |   |
|--|---|
| <input type="checkbox"/> E-mail  | 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   | Telephone Interview                                   |
| <input checked="" type="checkbox"/> 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      EDHA-07

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.dod.mil/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.      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: Cutoff upon verification of successful creation of the final document or file. Destroy 5 years after cutoff.

**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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care

Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 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; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD Manual 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs; and E.O. 9397 (SSN), as amended.

**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.

OMB approval is not required for the information collected in this system 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, paragraph 8b(5).