## 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:

Spectacle Request and Transmission System (SRTS)

2. DOD COMPONENT NAME: 3. PIA APPROVAL DATE:

Defense Health Agency 09/11/23

## 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

x 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

x 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 Spectacle Request and Transmission System (SRTS) is a Government developed clinic and laboratory web-based application that serves as the sole electronic system for ordering and tracking military eyewear. SRTS provides the electronic version of DD Form 771, Eyewear Prescription, used to collect the information required to fabricate prescription eyewear. SRTS manages the spectacle requests for personnel within the Department of Defense (DoD) Uniformed Services, United States Coast Guard, Department of Veterans Affairs, Federal Bureau of Prisons, United States Public Health Service, United States Department of State, Bureau of Indian Affairs, Reserve Officer Training Corps (ROTC), various humanitarian missions, as well as manages SRTS for use by other DoD Components and other Federal agencies.

The PII collected from active duty and retirees includes demographic information, medical information, and protected health information (PHI).

SRTS is managed under the Clinical Support Program Management Office (PMO) Health Information Technology (HIT/J6), Solution Delivery Division (SDD).

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 to identify the patient when establishing records used to order eyewear, make the eyewear, insure the eyewear is delivered to correct individual, and track eye health for the individual.

- e. Do individuals have the opportunity to object to the collection of their PII? X 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.

Individuals have the opportunity to object at the face-to-face point of care. Individuals are presented Department of Defense (DD) Form 2005, Privacy Act Statement – Health Care Records for review and signature. This form is placed in the patient's medical record. If individuals do not sign the form or object to the collection of their PII, comprehensive medical care and/or eyewear can be delayed or not distributed.

- f. Do individuals have the opportunity to consent to the specific uses of their PII? X 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.

Individuals have the opportunity to consent to specific uses of their PII face-to-face at the point of care. Individuals are presented

Department of Defense (DD) Form 2005, Privacy Act Statement – Health Care Records for review and signature. This form is placed in the patient's medical record. If individuals do not sign form or does not provide consent, comprehensive medical care and/or eyewear can be delayed or not distributed.

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: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter 55, Medical and Dental Care; 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.

PURPOSE: Spectacle Request and Transmission System collects information to process and manage military eyewear orders, to track eye health for individuals across the DoD, and to identify the patient.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the Department of Defense as follows: to military and civilian health care providers related to medical care and treatment of a patient; the Department of Veterans Affairs related to claims adjudication and the provision of medical care; to the National Research Council, National Institutes of Health, and similar institutions for authorized health research in the Federal Government's and the public's interest, to third party payers as statutorily permitted and as implemented within the DoD; and, among others, the DoD Blanket Routine Uses published at the beginning of the DoD's compilation of record system notices may apply. For further information related to Routine Uses, see the below hyperlinked SORNs.

Any protected health information (PHI) may be used and disclosed generally as permitted by the HIPAA Rules, as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

APPLICABLE SORN: EDHA 07, Military Health Information System (June 15, 2020; 85 FR 36190). https://dpcld.defense.gov/Portals/49/Documents/Privacy/SORNs/DHA/EDHA-07.pdf

DISCLOSURE: Voluntary. If you choose not to provide the requested information, no penalties will be imposed; however, comprehensive care and provision of services may not be possible or may result in significant delays, but care will not be denied.

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. Defense Health Agency (DHA)

- US Air Force

- US Army

- US Navy

- Defense Manpower Data Center (DMDC)

Other DoD Components (i.e. Army, Navy, Air Force)

Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

- US Army Medical Protection System (MEDPROS)

- US Air Force Aeromedical Services Information

Management System (ASIMS)

- Reserve Health Readiness Program (RHRP)

- MHS Genesis

- US Postal Service (USPS)

- US Coast Guard

- Department of Veterans Affairs

- Federal Bureau of Prisons

- US Public Health Service - US Department of State

- Bureau of Indian Affairs

- Reserve Officer Training Corps (ROTC)

State and Local Agencies

Specify. National Guard

Specify.

Contractor companies are Bestica and IBA. They are authorized to create accounts which requires the patients PII.

Contractors are required to complete and sign a DD-Form 2875 System Authorization Access Request (SAAR) to input data into SRTS, which includes a Privacy Act Statement authorized by Executive Order 10450, 9397; and Public Law 99-474, the Computer Fraud and Abuse Act. Their respective contracts contain language that mandates compliance with the Privacy Act; complete Health Insurance Portability and Accountability Act (HIPAA) training; and local policy requirements that protect PII.

Contract language: Personally Identifiable Information (PII), Protected Health Information (PHI) and Federal Information Laws:

Specify.

The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with Defense Federal Regulations Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference current versions DoDD 5400.11, "DoD Privacy Program," and DoD 5400.11-R, "DoD Privacy Program." The Contractor shall also comply with federal laws relating to freedom of information and records management. The Contractor shall analyze any breach of PII/PHI for which it is responsible under the terms of this Contract under both the Privacy Act and Health Insurance Portability and Accountability Act (HIPAA), if applicable, to determine the appropriate course of action under each requirement, if any."

clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Contractor (Name of contractor and describe the language in

the contract that safeguards PII. Include whether FAR privacy

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)
- X Individuals

Databases

**x** Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

Defense Enrollment Eligibility Reporting System (DEERS)

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

x E-mail

x Official Form (Enter Form Number(s) in the box below) € 1.00 € 2.00 €

x In-Person Contact

Fax

X Paper

Telephone Interview

 ${f x}$  Information Sharing - System to System

x Website/E-Form

Other (If Other, enter the information in the box below)

Patients address will be verified by U.S. Postal Service. Information collected via email, paper, and telephone based on Standard Operating Procedures for account creation and/or help desk troubleshooting.

The SRTS web link: https://srtsweb.amedd.army.mil/ is on the world wide web however, only authorized personnel that have completed and sign a DD-Form 2875 System Authorization Access Request (SAAR).

DD Form 771, Eyewear Prescription

Information Sharing - SRTS interfaces with the following systems:

- US Army Medical Protection System (MEDPROS)
- US Air Force Aeromedical Services Information Management System (ASIMS)
- Army Optical Lab Management System, Optivision
- Defense Manpower Data Center (DMDC)
- Defense Optical Fabrication Enterprise Management System (DOFEMS)
- United States Postal Service (USPS) Application Program Interface (API)
- 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 <u>retrieved</u> by name or other unique identifier. PIA and Privacy Act SORN information must be consistent.

X 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://dpcld.defense.gov/Privacy/SORNs/

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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.

- 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. DAA-0330-2017-007-001
  - (2) If pending, provide the date the SF-115 was submitted to NARA.
  - (3) Retention Instructions.

FILE NUMBER: 911-36

DISPOSITION: Temporary. Cut off all completed orders annually. Destroy 10 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 statue 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 Inforr collect data from 10 or more n	nation Management Control Officer or DoD Clearance Officer for this information. This number indicates OMB approval to nembers of the public in a 12-month period regardless of form or format.
Yes <b>x</b> No	Pending
<ul> <li>(1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.</li> <li>(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."</li> <li>(3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.</li> <li>This system is not the initial point of collection of information.</li> </ul>	
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