



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Patient Queuing and Notification System (PQNS)
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Defense Health Agency (DHA)
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### **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
- New Electronic Collection
- Existing DoD Information System
- Existing Electronic Collection
- Significantly Modified DoD Information System

**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**

**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.

System of Record Authorities: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 55 Medical and Dental Care; 10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection from Third Party Payers Act; 44 U.S.C. 3101, Records management by agency heads; general duties; DoD 6025.18-R Health Information Privacy Regulation; 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 PQNS system is managed by DHA/HIT Solution Delivery/Clinical Support. The PQNS project team provides management oversight, compliance, and cybersecurity support to Service owned queuing assets fielded across the MHS. The queuing product (Q-Flow) is a software suite for managing the flow of customers, advertising, and information in customer service centers. Q-Flow handles appointments, reception and registration, customer routing and queuing, service documentation, content management, monitoring, real time alerts, historical analysis, and reports. Q-Flow will track the life cycle of patient visits to MTFs by using PII to track and trace stops at various points of care for a patient at a MTF and will identify traffic flow patterns and usage points to help staff better manage patient flow.

Information is collected from MTF authorized Medical Technicians/Administrators. The types of PII collected in the system include name, social security number (last 4 digits) and the type of appointment (which would indicate the type of medical care a patient receives). Categories of individuals are DoD medical beneficiaries to include active duty and/or their dependents, retirees and/or their dependents, reservists, national guard personnel.

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

Risks include unauthorized disclosure by personnel with access and network intrusion. MTF information managers are vigilant to this threat by limiting system access to those individuals who have a defined need to access the information. There are defined criteria to identify who should have access to Q-Flow. These individuals have gone through extensive background and employment investigations.

The Q-Flow system unit employs security in multiple ways. The Q-Flow application has restricted access as it is deployed in a medical facility for military personnel and their families, and authorized beneficiaries. Military ID is required and members of the general public cannot gain access to the site itself. Within the installation, Q-Flow is installed behind access controlled areas within the Pharmacy or Information Management departments which are locked, limited access spaces with protection measures adequate for protecting sensitive information and information systems. Anyone entering either of these spaces must be escorted at all times.

The Q-Flow system limits access to stored information through role-based user access and authentication of users. Only privileged users can access Flow.

**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.

Contractor: ACF Technologies. Contract (N62645-15-F-1085) verbiage includes the following clause:

Health Insurance Portability and Accountability Act (HIPAA). The contractor shall comply with the HIPAA Act of 1996 (Public Law 104-191) requirements, specifically the administrative simplification provisions of the law and the associated rules and regulations published by the Secretary, Health and Human Services (HHS). This includes the Standards for Electronic Transactions, the Standards for Privacy of Individually Identifiable Health Information and the Security Standards.

Business Associate Agreement. In accordance with DoD 6025.18-R "Department of Defense Health Information Privacy Regulation" the Contractor meets the definition of Business Associate. Therefore, a Business Associate Agreement is required to comply with both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security regulations. This clause serves as that agreement whereby the Contractor agrees to abide by all applicable HIPAA Privacy and Security requirements regarding health information as defined in this clause, and DoD 6025.18-R and DoDI 8580.02, as amended. Additional requirements will be addressed when implemented.

**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.

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

Q-Flow does not collect PII directly from the patient - it is not the source system.

**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.

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

Q-Flow does not collect PII directly from the patient - it is not the source system.

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

- |   |  |
|---|--|
| <input type="checkbox"/> <b>Privacy Act Statement</b> | <input type="checkbox"/> <b>Privacy Advisory</b> |
| <input type="checkbox"/> <b>Other</b>                 | <input checked="" type="checkbox"/> <b>None</b>  |

Describe each applicable format.

Q-Flow does not collect PII directly from the patient - it is not the source system.

**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.**

