

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:

Defense Occupational and Environmental Health Readiness System - Industrial Hygiene (DOEHRS-IH)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: foreign nationals are included in general public.)

- | | |
|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <input type="checkbox"/> From members of the general public | <input checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

b. The PII is in a: (Check one)

- | | |
|------------------------------------------------------------------------|---------------------------------------------------------|
| <input type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input checked="" type="checkbox"/> Existing DoD Information System | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 purpose of the DOEHRS-IH system is to establish a database for career-long exposure record keeping and reporting to support occupational and environmental health inspection (OEH), public health inspection, health risk management, and medical inspection; and to provide this data in support of medical treatment, occupational and environmental illness evaluations, disability determinations, and claims adjudication. Another purpose of this system is to complete the collection and analysis of threat exposures for designated event areas in all phases of military operations and as a result of actual or perceived natural disasters, hazardous material releases, chemical/biological/nuclear accidents which may affect Department of Defense (DoD)-affiliated personnel. DOEHRS-IH is fully deployed to the Army, Navy and Air Force.

Individuals covered by the DOEHRS-IH system include:

Members of the Armed Forces; DoD-affiliated personnel (includes DoD civilian employees, DoD contractors, and DoD foreign national employees) who live or work in areas requiring longitudinal data related to occupational, environmental, or public health. Also, spouses and dependents of members of the Armed Forces and DoD-affiliated personnel are included if such spouse or dependent is in the area of a perceived or actual occupational, environmental, or public health event.

The types of personal information about individuals collected in the system individuals include: Personal descriptors, personal ID numbers, social security numbers, protected health information, event based information, demographics, contact information, marital status, and employment information.

DOEHRS-IH is owned by the Defense Health Agency (DHA) and managed under the Solution Delivery Division (SDD) Clinical Support Program Management Office (PMO).

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 reason for the collection of PII is (1) to establish a database for career-long exposure record keeping and reporting to support occupational and environmental health inspection (OEH), public health inspection, health risk management, and medical inspection; and to provide this data in support of medical treatment, occupational and environmental illness evaluations, disability determinations, and claims adjudication; (2) to complete the collection and analysis of threat exposures for designated event areas in all phases of military operations and as a result of actual or perceived natural disasters, hazardous material releases, chemical/biological/nuclear accidents which may affect DoD-affiliated personnel.

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. If you choose not to provide your information, no penalty may be imposed; however, failure to provide the requested information may result in removal from your duties and/or administrative delays.

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 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 PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DoD 6025.18-R, C10.1. For uses other than treatment, payment and healthcare operations, individuals can authorize the use of their PHI by submitting DD Form 2870. For uses other than treatment, payment and healthcare operations, individuals can request restrictions on the use of the PHI by submitting DD Form 2871.

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

This statement serves to inform you of the purpose for collecting personal information required by Defense Occupational and Environmental Health Readiness System –Industrial Hygiene (DOEHRS-IH) and how it will be used.

AUTHORITY: 10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; and E.O. 9397 (SSN), as amended.

PURPOSE: To collect your data regarding exposure to occupational health hazards for record keeping, health surveillance, treatment, and other purposes.

ROUTINE USES: Information in your records may be disclosed to private physicians and Federal agencies, including the Departments of Veterans Affairs, Health and Human Services, and Homeland Security in connection with your medical care; other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and non-government third parties to recover the cost of healthcare provided to you by the Military Health System. For a full listing of the Routine Uses, please refer to the applicable SORN.

Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, healthcare operations, and the containment of certain communicable diseases.

For a full listing of the applicable Routine Uses, refer to the applicable SORN.

APPLICABLE SORN: EDHA 19, Defense Occupational & Environmental Health Readiness System – Industrial Hygiene (DOEHRS-IH) (November 18, 2013, 78 FR 69076) is the SORN applicable to this system.
<https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570682/edha-19/>

DISCLOSURE: Voluntary. If you choose not to provide your information, no penalty may be imposed; however, failure to provide the requested information may result in removal from your duties and/or administrative delays.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)

Within the DoD Component

Specify.

DOEHRS-IH includes corporate reporting, which provides timely and efficient worldwide access of data and information to users throughout the DoD. Only personnel with the appropriate level of access are able to see PII, and they only have access to data specific to their area of responsibility.

Other DoD Components

Specify.

Defense Manpower Data Center (DMDC) provides data which is used to match personnel to occupational workplaces. DOEHRS-IH includes corporate reporting, which provides timely and efficient worldwide access of data and information to users throughout the DoD, including Military Treatment Facility (MTF) Commanders, Industrial Site Commanders, Deployed Site and MTF Commanders, Lead Agents, and Installation Agencies. Corporate reporting is the ability to roll-up data from the site level to the service level and up to the DoD level. However, only personnel with the appropriate level of access are able to see PII, and they only have access to data specific to their area of responsibility.

Other Federal Agencies

Specify.

DOEHRS-IH provides personnel exposure data to Department of Labor upon request for use in Federal Workers' Compensation on a case by case basis by the Services. There is no interface or other method for sharing information on a routine basis. DOEHRS-IH ILER (Individual Longitudinal Exposure Record) provides exposure and personnel data to the Veterans Administration on an ongoing basis.

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.

Contractors:
-Business Enabled Acquisition & Technology (BEAT) - for Tier III Enterprise Sustainment
-Northrop Grumman - for Capacity Services Support
-Aderas - for ILER

DOEHRS-IH provides PII to contractors who provide support through system enhancements. Additionally, there are DOEHRS-IH users who are contractors that access data and import data into DOEHRS-IH and are supervised by their Unit Services Administrator.

Contractors maintain DOEHRS-IH data by accessing database servers hosted by Defense Information Systems Agency (DISA).

DOEHRS-IH contractors are required to sign the DHA CONTRACTOR NON-DISCLOSURE AGREEMENT (NDA), Revised February 12, 2014. As used in this Agreement, sensitive information is an overarching term that also includes, but is not limited to, sensitive but unclassified information/data, Protected Health Information, For Official Use Only information/data, and Privacy Information.

DOEHRS-IH contractors are also required to sign a Data User Agreement (DUA).

Contractor's contract includes the following privacy clauses: 52.239-1, Privacy or Security Safeguards and the BEAT contract states that the contractor should comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) (P.L. 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) and the published TRICARE Management Activity (DHA) implementation directions. This includes the Standards for Electronic Transactions, the Standards for Privacy of Individually Identifiable Health Information and the Security Standards. It is expected that the contractor should comply with all HIPAA-related rules and regulations as they are published and as DHA requirements are defined (including identifiers for providers, employers, health plans, and individuals, and standards for claims attachment transactions).

Specify.

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

i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)

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

Information is collected from the individual by a user who is a Occupational/Environmental Health professional within the DOEHRS-IH web application.

DOEHRS-IH interfaces with the Defense Manpower Data Center (DMDC). DMDC maintains the archive of personnel, manpower, training, and financial data for the DoD. The communication between DOEHRS-IH and DMDC is bidirectional over a virtual private network (VPN) connection, which is initiated by DOEHRS-IH. DOEHRS-IH retrieves personnel information from DMDC using a site-to-site VPN provided by DMDC's Authentication Data Repository Access Data Warehouse (ADR-ADW) system. ADR-ADW is located at DMDC's computer site.

DOEHRS-IH ILER will be collecting a one time data set from DMDC/Contingency Tracking System (CTS) to include non-classified deployment information (2001 to 2018) for DoD personnel.

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

- | | |
|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <input type="checkbox"/> E-mail | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> Face-to-Face Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input checked="" type="checkbox"/> Website/E-Form |
| <input checked="" type="checkbox"/> Other (If Other, enter the information in the box below) | |

DOEHRS-IH is accessible by authorized, registered users from the Internet at <https://doehrs-ih.csd.disa.mil>. DOEHRS-IH interfaces obtain PII from DMDC Defense Enrollment Eligibility Reporting System (DEERS).

DOEHRS-IH ILER is accessible by authorized/registered users at <https://ILER-Test.csd.disa.mil>. The one-time data set from DMDC/CTS will be via encrypted electronic data transfer.

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

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/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.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

Disposition pending (treat records as permanent until the National Archives and Records Administration (NARA) approves the proposed retention and disposition).

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.

Per the SORN, authority for maintenance of the system:

10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; 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.

DOEHRS-IH does not routinely collect PII information from members of the general public. DOEHRs-IH collects information from Members of the Armed Forces and DoD-affiliated personnel who live or work in areas requiring longitudinal data related to occupational, environmental, or public health. Public collection, such as from spouses and dependents of members of the Armed Forces and DoD-affiliated personnel, could be included if such spouse or dependent is in the area of a perceived or actual occupational, environmental, or public health event. The last event impacting the public occurred in 2011 (Operation Tomodachi). These situations are rare and not subject to the Paperwork Reduction Act.