

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:

Clinical Information System (CIS) Essentris Inpatient System

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

09/08/2022

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

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

From members of the general public

From Federal employees and/or Federal contractors

From both members of the general public and Federal employees and/or Federal contractors

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.

Clinical Information System (CIS)/Essentris® Inpatient System (hereinafter "CIS Essentris®") the Military Health System (MHS) inpatient documentation solution is a comprehensive clinical documentation system for use in acute care hospitals. CIS/Essentris® enables continuous and automated clinical documentation and bedside point-of-care data capture. All inpatient clinical documentation is created and stored in CIS/Essentris®, the Composite Health Care System (CHCS), and bedside instruments. Clinical data may be aggregated, trended, and analyzed to manage care for a single patient or for an entire patient population. CIS/Essentris® also provides waveform documentation, graphical trending on patient parameters, a reference library, patient education materials, and various reporting capabilities such as change of shift reports, task lists, and administrative reports.

CIS/Essentris® is an unclassified commercial off the shelf (COTS) system supporting the delivery of inpatient, emergency department, and selected outpatient care at DoD Military Treatment Facilities (MTFs). DHA has purchased licenses and is under contract to utilize this COTS product, owned by the vendor, CliniComp International. DHA operates the system at all sites, with support from the vendor.

The data contained in CIS/Essentris® is collected from and about Department of Defense (DoD) beneficiaries, foreign nationals when necessary, retirees and their dependents, contractors, former spouses, Reservists, and National Guard personnel for the purpose of providing requested health care. The types of Personally Identifiable Information (PII) and/or Protected Health Information (PHI) collected from these individuals may include employment information, personal contact information, work contact information, Official Duty information, demographic information, beneficiary information, medical information, and social security number (SSN) information. PII is also collected from CIS/Essentris® users in their capacity as federal employees and contractors for the purpose of user account creation and maintenance. PII collected for this purpose may include Official Duty information, employment information, and work contact information.

The Defense Health Agency, Solution Delivery Division, Chief Information Officer (CIO)/ Deputy Assistant Director, Information Operations (DAD IO/J-6) owns and manages CIS/Essentris®.

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 by CIS/Essentris® for patient identification to verify an individual's eligibility for care when visiting an MTF, to administer health care services, and to support administration and clinical practice authorization and access.

The intended use of PII collected by CIS/Essentris® is to support the provision of inpatient health care for DoD beneficiaries at MTFs throughout the MHS.

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.

The Patient is informed that collection of their PII is voluntary, and they may object - either in writing, verbally, or both - to providing elements of their PII based on the procedures in place at the local facility where the data is initially collected and primarily maintained. If a Patient opts to object to the collection of their PII, care will not be denied; however, significant administrative delays may result.

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.

The Patient is provided the opportunity to consent – either in writing, verbally, or both - to the specific uses of their PII based on the procedures in place at the local facility where the data is initially collected and primarily maintained. If a patient wishes to not consent to the specific uses of their PII, care will not be denied; however, significant administrative delays may result.

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

Privacy Act Statement

This statement serves to inform you of the purpose for collecting personal information as required by CIS Essentris and how that information will be stored and used.

AUTHORITIES: Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 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. 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.

PURPOSE: CIS Essentris, the Military Health System (MHS) inpatient documentation solution, is a comprehensive clinical documentation system for use in acute care hospitals. CIS Essentris enables continuous and automated clinical documentation and bedside point-of-care data capture. All inpatient clinical documentation is created and stored in CIS Essentris, the Composite Health Care System (CHCS), and bedside instruments. Clinical data may be aggregated, trended, and analyzed to manage care for a single patient or for an entire patient population. CIS Essentris also provides waveform documentation, graphical trending on patient parameters, a reference library, patient education materials, and various reporting capabilities such as change of shift reports, task lists, and administrative reports.

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 nongovernment third parties to recover the cost of healthcare provided to you by the Military Health System.

Any protected health information (PHI) in your records 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://dpeld.defense.gov/Portals/49/Documents/Privacy/SORNS/DHA/EDHA-07.pdf>

DISCLOSURE: Voluntary. If you choose not to provide the requested information, there may be administrative delays, but no penalty may be imposed and care will not be denied.

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

- | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. | DHA and MTF personnel throughout the MHS; DHA National Capital Region (NCR) Market personnel; PEO DHMS Enterprise Intelligence and Data Solutions (EIDS) Program Management Office (PMO) |
| <input checked="" type="checkbox"/> Other DoD Components | Specify. | The Departments of the Army, Navy, and Air Force |
| <input checked="" type="checkbox"/> Other Federal Agencies | Specify. | The Department of Veterans Affairs (VA) |
| 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 | |

Existing DoD Information Systems: Composite Health Care System (CHCS)

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

- | | |
|----------------------------------------------------------------------------|-------------------------------------------------------|
| E-mail | Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> Face-to-Face Contact | Paper |
| 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.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. N1-330-11-001, Item 2

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

(3) Retention Instructions.

Temporary. Cut off upon last episode of patient care or last entry to the patient record is annotated. Destroy/Delete 6 years after cutoff.

Additionally, CIS/Essentris is currently under review to determine if the 6 year retention is sufficient. Essentris holds the inpatient record which has a 50 year retention period. Note: CIS/Essentris is planned for decommission and will be replaced by MHS Genesis. MHS Genesis is currently targeted to subsume existing CIS/Essentris capabilities no later than Fiscal Year end 2024.

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 Ch. 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); DoDM 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs.

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.

On April 13, 2016, OMB Desk Officer for DHA collections determined that this system is not subject to any Paperwork Reduction Act requirements. This system was exempted under the clinical trials exception.