

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:

Protected Health Information Management Tool (PHIMT)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

12/01/23

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.

The Protected Health Information Management Tool (PHIMT) provides the Military Health System (MHS) with a web-based application that simplifies and automates many of the provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule. PHIMT is used to track disclosures of protected health information (PHI) and provide reports of those disclosures, upon request, to the patient. PHIMT is also employed to document (1) patient privacy complaints; (2) disclosure of accounting suspensions and restrictions; and (3) patient information disclosure authorizations and restrictions to PHI. PHIMT also serves as the primary enterprise MHS tool for recording and managing all types of health information releases, including those that are HIPAA specific and those that are simply related to treatment, payment, and healthcare operations. The application hosts a website that is DoD Public Key Enabled (PKE) and enforced and accessible only by authorized users via their Common Access Card (CAC).

Categories of individuals that have information contained in this system are: members, former members, retirees, civilian employees (includes non-appropriated fund), and contractor employees of the DoD and all of the Uniformed Services. A Non-DoD Beneficiary and DoD Beneficiary is a person who receives benefits from the DoD based on prior association, condition or authorization. Some examples are former spouses, civilian retirees, DoD OCONUS hires, Foreign Army, Foreign Navy, Foreign Marine Corps, Foreign Air Force, Foreign Coast Guard, Medal of Honor recipients, U.S. Military Academy students, members of the public treated for a medical emergency in a DoD or joint DoD/DVA medical facility and Non-DoD Civilian employees.

The types of personally identifiable information (PII) and protected health information (PHI) collected in the system include: Name, Electronic Data Interchange Personal Identifier / Electronic Data Interchange Personal Number (EDIPI/EDIPN), Date of Birth (DOB), mailing address, phone number(s), medical information, and social security numbers (SSN) for individuals who may or may not receive an EDIPI/EDIPN.

Data are provided by source information systems for beneficiaries of the DoD health network, including direct care and purchased care systems (e.g. dependents, retirees and/or their dependents, active duty, contractors, foreign nationals, former spouses, Reserve, and National Guard personnel).

PHIMT is in its operational/maintenance life cycle phase. The Defense Health Agency (DHA) owns a license for the application, and it is operated by the Clinical Support Program Management Office (CSPMO)/ Solution Delivery Division (SDD)/Program Executive Office (PEO) Medical Systems (J-6).

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)

PHIMT collects PII for the purpose of authentication and data matching. The PII collected is for administrative use such as recording disclosures, suspensions, restrictions, reports, letters, authorizations, notices, complaints, and accounting of disclosures.

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.

PHIMT receives PII directly from the Military Health System (MHS) Data Repository (MDR). Individuals are unable to object to the collection of their PII because PHIMT does not serve as the initial point of collection.

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.

PHIMT receives PII directly from the Military Health System (MHS) Data Repository (MDR). Individuals do not have the opportunity to consent to the specific uses of their PII because PHIMT does not serve as the initial point of collection

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

In accordance with the Privacy Act of 1974 (Public Law 93-579), the notice informs you of the purpose of the form and how it will be used. Please read it carefully.

AUTHORITY: Public Law 104-191; E.O. 9397 (SSAN); DoD 6025.18-R.

PRINCIPAL PURPOSE(S): This form is to provide the Military Treatment Facility/Dental Treatment Facility/TRICARE Health Plan with a means to request the use and/or disclosure of an individual's protected health information.

ROUTINE USE(S): To any third party or the individual upon authorization for the disclosure from the individual for: personal use; insurance; continued medical care; school; legal; retirement/separation; or other reasons.

DISCLOSURE: Voluntary. Failure to sign the authorization form will result in the non-release of the protected health information. This form will not be used for the authorization to disclose alcohol or drug abuse patient information from medical records or for authorization to disclose information from records of an alcohol or drug abuse treatment program. In addition, any use as an authorization to use or disclose psychotherapy notes may not be combined with another authorization except one to use or disclose psychotherapy notes.

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.

DHA Military Treatment Facilities (MTFs)/Dental Treatment Facilities (DTF)

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

Specify.

Departments of the Army, Navy, Air Force, Space Force and Marine Corps

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

Specify.

The Department of Homeland Security (DHS) (US Coast Guard)

☐ 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)

☒ Individuals

☐ Databases

☒ Existing DoD Information Systems

☐ Commercial Systems

☐ Other Federal Information Systems

Individuals: PHIMT users may enter data from an individual's DD2870 and/or DD2871 into PHIMT to fulfill the purpose of record disclosures, suspensions, restrictions, reports, letters, authorizations, notices, complaints and accounting of disclosures.

Existing DoD Information Systems: Military Health System (MHS) Data Repository (MDR); 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)

- | | |
|---|---|
| ☐ E-mail | ☒ Official Form (Enter Form Number(s) in the box below) |
| ☐ In-Person Contact | ☐ Paper |
| ☐ Fax | ☐ Telephone Interview |
| ☒ Information Sharing - System to System | ☐ Website/E-Form |
| ☐ Other (If Other, enter the information in the box below) | |

Information Sharing – System to System: MDR; DEERS

Official Form: DD2870 (Authorization for Disclosure of Medical or Dental Information); DD2871 (Request to Restrict Medical or Dental Information).

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.

FILE NUMBER: 203-18

DISPOSITION: Temporary. Cut off (Close out) at end of the calendar year. Destroy 6 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.

10 U.S.C., Chapter 55, Medical and Dental Care; Pub. L. 104-91, Health Insurance Portability and Accountability Act of 1996; DoDI/DoDM 6025.18, DoD Health Information Privacy Regulation; 10 U.S.C. 1071-1085, Medical and Dental Care; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; 10 U.S.C. 1097a and 1097b, TRICARE Prime and TRICARE Program; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children; 10 U.S.C. 1079a, 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; DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 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.

The DHA Information Management Control Office (IMCO) determined PHIMT does not require an OMB Control Number because PHIMT is not the initial point of collection of information.

The information collected in this system is for the diagnosis and treatment of medical disorders and does not collect PHI/PII directly from individuals. It is not the initial point of collection for any PHI/PII and is not considered a public information collection IAW DoDM 8910.01, V2, Encl 3, paragraph 8b(5).