

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:

ScImage PICOM Enterprise PACS

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

07/26/24

PMO - Integrated Clinical Systems (CAE)

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.

ScImage PICOM Enterprise PACS (PICOM) is a turnkey hardware and software solution providing Enterprise Radiology and/or Cardiology and/or Other 'Ologies Picture Archiving and Communications System (PACS) functionality for on-premise, virtual, and tele-medicine configurations. It is implemented using government-approved physical and/or virtual machine platforms and provides standard PACS features enabling the acquisition, storage, management, diagnostic viewing, reporting, and result distribution of DICOM and NON-DICOM medical imaging studies as well as advanced tool sets for image exchange and interoperability. The PICOM Enterprise Cardiology module provides native ECG Management and integrated Hemodynamics monitoring and reporting. Native HL7 services are available to receive orders from and send reports to an existing EHR or Ordering System. PICOM Enterprise has validated ORM, ADT, and ORU including encoded PDF results with MHS Genesis using HL7 over TLS 1.2 protocols with AES256. DICOM Image acquisition can have its quality checked against established orders and managed accordingly. NON-DICOM Image acquisition, such as XML-PDF from ECG, Stress, or Holter can also have its quality checked against established orders and managed accordingly.

Personally Identifiable Information (PII) and Protected health Information (PHI) collected in this system include: Name, Patient ID, Study Accession Number, Citizenship, Legal Status, Race/Ethnicity, Date of Birth, Place of Birth, Phone Numbers, Addresses, Marital Status, and Emergency Contact Information. PICOM Enterprise acquires and exports limited PHI related to Patient and Study meta data concerning medical imaging exams including Medical Information, Study Date, Study Order Number, Study Description, and Provider identification. PICOM Enterprise does not store Social Security number, PCI or other financial information. The categories of individuals with records in this system include Armed Forces Personnel and dependents; DoD Civilians; DoD contractors; retired military members; Public Health Service personnel; and other individuals authorized to receive medical care in a DoD MTF.

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 within PACS for identification purposes to match individuals with their radiological imaging studies.

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.

Individuals have an opportunity to object to and/or request restriction to use or disclosure the collection of their PII during admission, admission forms include detailed PII/PHI information.

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.

Individuals have an opportunity to consent to the specific uses of their PII using DD Form 2005 Privacy Act Statement – Health Care Records. If individuals withhold consent from the specific uses of their PII, comprehensive health care services may not be possible, there may be administrative delays, however, medical care will not be denied.

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

1. AUTHORITY: Sections 133, 1071-87, 3012, 5031 and 8012, title 10, United States Code and Executive Order 9397.
2. PRINCIPAL PURPOSES: The personal information facilitates and documents your health care.
3. ROUTINE USES: The primary use of this information is to provide, plan and coordinate health care. As prior to enactment of the Privacy Act, other possible uses are to: Aid in preventive health and communicable disease control programs and report medical conditions required by law to federal, state and local agencies; compile statistical data; conduct research; teach; determine suitability of persons for service or assignments; adjudicate claims and determine benefits; other lawful purposes, including law enforcement and litigation; conduct authorized investigations; evaluate care rendered; determine professional certification and hospital accreditation; provide physical qualifications of patients to agencies of federal, state, or local government upon request in the pursuit of their official duties.
4. DISCLOSURE: For military personnel, the requested information is mandatory to properly document active duty medical incidents in view of future rights and benefits. For all other personnel/beneficiaries, the requested information is voluntary, though if not provided, comprehensive health care may not be possible, however, 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)

<input checked="" type="checkbox"/> Within the DoD Component	Specify.	DHA Military Treatment Facilities (MTFs)
<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	Army, Navy and Air Force MTFs
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	U.S Coast Guard, Veterans Administration, Public Health Service, Center for Disease Control
<input type="checkbox"/> State and Local Agencies	Specify.	
<input checked="" type="checkbox"/> 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.	The Manufacturer servicing the device may have access to some data, contracts include a standard Military Health System (MHS) HIPAA Business Associate Agreement, DoD/HIPAA guidelines.
<input type="checkbox"/> 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	<input type="checkbox"/> Databases
<input checked="" type="checkbox"/> Existing DoD Information Systems	<input type="checkbox"/> Commercial Systems
<input type="checkbox"/> Other Federal Information Systems	

PII is collected from imaging modalities, the electronic medical record system CHCS/AHLTA and MHS Genesis as applicable.

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 type="checkbox"/> In-Person Contact	<input type="checkbox"/> Paper
<input type="checkbox"/> Fax	<input type="checkbox"/> Telephone Interview
<input checked="" type="checkbox"/> Information Sharing - System to System	<input type="checkbox"/> Website/E-Form
<input type="checkbox"/> Other (If Other, enter the information in the box below)	

Platform IT System

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://dpclld.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.

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.

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

(3) Retention Instructions.

FILE NUMBER: 927-17

DISPOSITION: Temporary. Cut off after the end of the calendar year in which the last film was taken. Destroy 5 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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 USC Chapter 55, Medical and Dental Care; 10 USC 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 USC 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 USC 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 USC 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 USC 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 USC 290dd-2, Confidentiality Of Records; 42 USC 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.

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.