

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:

BDAACH MyChild Infant Protection System

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

08/16/24

Brian D. Allgood Army Community Hospital (BDAACH)

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 McRoberts MyChild System is an electronic security system connected to the DHA MedCOI network designed to prevent the abduction of infants and pediatric patients. The MyChild system provides real-time visibility and monitoring of patients and infants using active radio-frequency identification (RFID) tag technology to track their locations. The MyChild System includes receivers that relay messages from the security tags, egress points located at stairs or exit doors lock when a RFID -enabled security tags approaches to prevent abduction. Events and alarms are displayed on workstations via the MyChild software. The McRoberts MSTWatch Workstation software includes a security tag management service that includes inventory control, testing, and disinfection on a per-birth basis.

Personally Identifiable Information (PII) is collected includes: patient last name, room number, the infant's RFIG tag number is annotated in the Mother's charts. Combining the Patient Last Name, and Room Number is a unique identifier that allows the hospital staff to track infants and patients throughout a protected area and receive notifications of security tag tampering and low battery. Categories of individuals about whom the Personally Identifiable Information (PII) is collected include: active-duty military (all services + Reserve), Coast Guard, National Guard, veterans, dependents, retirees and/or their dependents, contractors.

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 to ensure the RFID tag is assigned to the unique patient and configured via the MyChild application so hospital staff can track the patient's movement.

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 opportunity for individuals to object to the collection of PII is presented at the time it is entered in this system. Department of Defense (DoD) Form 2005, Privacy Act Statement – Health Care Records, is acknowledged by the individual and maintained in the health record.

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 opportunity for individuals to consent to the specific uses of their PII is presented at the time it is entered in this system. DoD Form 2005, Privacy Act Statement – Health Care Records, is acknowledged by the individual and a copy is maintained in the health record.

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:** 10 USC 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. Chapter 55, Medical and Dental Care; 42 USC Chapter 32, Third Party Liability for Hospital and Medical Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6055.05, Occupational and Environmental Health (OEH); and EO 9397 (SSN), as amended.

2. **PURPOSES:** Information is collected to provide and document your medical care; determine eligibility for benefits and entitlements; adjudicate claims; determine whether a third party is responsible for the cost of Military Health System (MHS) provided healthcare and recover that cost; evaluate your fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard; evaluate the MHS and its programs; and perform administrative tasks related to MHS operations and personnel readiness.

3. **ROUTINE USES:** Information in your records may be disclosed to: Private physicians and Federal agencies, including the Department of Veterans Affairs, Health and Human Services, and Homeland Security (with regard to members of the Coast Guard), in connection with your medical care; Government agencies to determine your eligibility for benefits and entitlements; Government and non-government third parties to recover the cost of MHS provided care; Public health authorities to document and review occupational and environmental exposure data; and Government and non-government organizations to perform DoD-approved research.

4. **DISCLOSURE:** Voluntary. If you choose not to provide the requested information, comprehensive health care services may not be possible, you may experience administrative delays, and/or be rejected for service or an assignment, however, care will not be denied. Information in your records may be used for lawful reasons including teaching, compiling statistical data, and evaluating the care rendered. Use and disclosure outside of DoD may occur per 5 USC 552a(b) of the Privacy Act of 1974, as amended, which incorporates the DoD Blanket Routine Uses published at: <http://dpcl.d.defense.gov/privacy/SORNsIndex/BlanketRoutineUses.aspx>. Protected Health Information (PHI) may be used and disclosed as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented within DoD by DoD 6025.18-R. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

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)

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

Specify.

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

Specify.

☐ 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.

McRoberts MyChild System contract includes language to safeguard PII including FAR clauses: 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and FAR 39.105, Privacy. A HIPAA Business Associate Agreement is required when the contractor has access to PHI.

☐ 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

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)

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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.

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.

GRS 5.6, item 090 (DAA-GRS-2021-0001-0003), GRS 5.6, item 100

+

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

(3) Retention Instructions.

As Applicable

FILE NUMBER: 101-05

DISPOSITION: Temporary. Cut off and destroy when 30 days old.

FILE NUMBER: 204-21

DISPOSITION: Temporary. Cut off and destroy after final investigation or reporting action, or when 3 years old, whichever is later

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 USC 3013, Secretary of the Army; 10 USC 1071-1085, Medical and Dental Care; 50 USC Supplement IV, Appendix 454, as amended, Persons liable for training and service; 42 USC Chapter 117, Sections 11131-11152, Reporting of Information; 10 USC 1097a and 1079a, TRICARE prime and TRICARE Program; 10 USC 1079, Contracts for Medical Care for Spouses and Children; 10 USC 1079a, CHAMPUS; 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; E.O. 9397 (SSN); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTF); DoD Directive 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS)

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 information collected in this system is not from members of the public.