

## 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:

Limited Duty Sailor and Marine Readiness Tracker Military Health System (MHS) Application Access Gateways (LIMDU SMART MAAG)

### 2. DOD COMPONENT NAME:

Defense Health Agency

### 3. PIA APPROVAL DATE:

08/26/24

Sub-Component: Bureau of Medicine and Surgery

### 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.**

Limited Duty Sailor and Marine Readiness Tracker Military Health System (MHS) Application Access Gateways (LIMDU SMART MAAG) provides Navy and Marine Corps with real-time visibility of all personnel on limited duty (LIMDU) status, capability to run reports on all aspects of Limited Duty Program, and electronically manage process workflows. Full visibility of all Sailors and Marines assigned to LIMDU supports overall readiness status. MTF staff with Convening Authority can compile key data elements by utilizing LIMDU SMART MAAG's analytical reports and dashboards to depict care management.

LIMDU SMART MAAG's data "at-a-glance" feature effectively provides visibility of all Sailors' and Marines' limited duty status while safeguarding service member's Personal Identification Information (PII) through role-based access and read/write audit trails. LIMDU SMART MAAG modernizes the legacy paper-based LIMDU program, providing force strength clarity and comprehensive insight into service member's care via a centralized, web-based application.

PII collected about active duty service members will include: Name, SSN, date of birth, race/ethnicity, home address, home telephone number, personal email address, employment, medical and disability information.

LIMDU SMART MAAG is owned and operated by Department of NAVY, Bureau of Medicine and Surgery, Medical Readiness program management office under the Deputy Assistant Director Information Operations (DAD IO), (J-6), Solution Delivery Division.

**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)

Primary collection; User registration – verification, identification, authentication.

To determine individual and unit medical readiness – mission related.

Chapter 18 of the NAVMED P-117 (Manual of Medicine) outlines the vital components and processing of Medical Evaluation Boards (MEB) and Medical Evaluation Board Reports (MEBR) for Navy and Marine Corps service members who are removed from full duty for medical reasons; to include LIMDU. This process directly effects Individual and Unit Medical Readiness.

Fitness for duty – mission related.

The collected data is used to evaluate the fitness of service members for continued military service. Members removed from full duty for medical reasons are evaluated by medical personnel. The information entered by the medical staff and approved Convening Authority staff creates the service member's limited duty case. Patient Administration Medical Boards Department monitors the progress of limited duty

case in accordance with Navy's Limited Duty Program policy.

**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 may decline to provide their information, however NAVMED P-117 (Manual of Medicine) requires an evaluation for continued service for all members removed from duty for medical reasons.

**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 may provide their consent for the specific use of their information by providing the information after receiving a copy of the Privacy Act Statement.

**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

A pre-printed department of Defense (DD) Form 2005, "Privacy Act Statement – Health Care Records" is provided to the patient at the point of care for review and signature and it is placed in the patient's medical record.

All members who have PII entered in LIMDU SMART MAAG are interviewed by Medical Board Office staff members prior to and during the data collection process. The process of the collection and evaluation of the data is verbally explained to each member. The privacy of the information is detailed to the member and the member's signature is required prior to the data being forwarded to the evaluation board.

**Privacy Act Statement**

This statement serves to inform you of the purpose for collecting personal information required by LIMDU SMART MAAG and how it will be used.

**AUTHORITY:** 10 U.S.C.55 Medical and Dental Care; 10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection from Third Party Payers Act; 44 U.S.C. 3101, Records management by agency heads; 5 CFR 293.502, Subpart E, Employee Medical File System Records; DoD 6025.18-R Health Information Privacy Regulation; and E.O. 9397 (SSN), as amended.

**PURPOSE:** To collect information from you to be used for real-time visibility of all personnel on limited duty status, run reports on all aspects of the LIMDU Program, and electronically manage process workflows.

**ROUTINE USES:** Information in your records may be disclosed to private physicians and Federal agencies, including the Department of Veterans Affairs, Health Services, and Homeland Security in connection with your medical care; other government agencies to determine your eligibility for benefits and entitlements; and government and nongovernment third parties to recover to cost of healthcare provided to you by the Military Health System. Use and disclosure of your records outside of DoD may also occur in accordance with the Privacy Act of 1974, as amended (5 U.S.C. 552a(b)).

Any protected health information (PII) in your records may be used and disclosed generally as permitted by the HIPPA 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 and healthcare operations.

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

**APPLICABLE SORN:** N06150-2, Health Care Record System (June 16, 2003, 68 FR 35657), is the applicable SORN for this system.

**DISCLOSURE:** Voluntary. If you choose not to provide your information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

**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.

PII is shared with authorized users at Defense Health Agency (DHA) and clinicians and Patient Administration staff at DHA Medical Treatment Facilities (MTFs).

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

Specify.

PII is shared with authorized users at the Bureau of Navy Medicine and Surgery (BUMED). BUMED users are only authorized to view LIMDU SMART MAAG for their specific regional commands. PII is also shared with Navy and Marine Corps personnel headquarters' authorized users, Personnel Support Detachment (PSD), Command Deployability, and LIMDU Coordinator staff. No medical information will be shared with Headquarters, PSD, Command Deployability, and LIMDU Coordinator staff.

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

Specify.

Information may be disclosed to authorized users Federal agencies, including the Department of Veterans Affairs, the Department of Health and Human Services and the Department of Homeland Security.

☐ State and Local Agencies

Specify.

Universal Consulting Agency (UCS) provides system maintenance support LIMDU SMART MAAG and has access to the PII therein. Contract N00189-15-P-Z464 contains the following language that safeguards PII:

☒ 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 Contractor shall establish required administrative, technical and physical safeguards to protect any, and all Government data, including PII/PHI. The Contractor shall also ensure the confidentiality, integrity, and availability of data in compliance with all applicable laws and regulations, including data breach reporting/responses requirements. The Contractor shall comply with federal laws relating to FOIA and records management and analyze breaches of PII/PHI for which it is responsible under both the Privacy Act and HIPAA. 9.1.11. UCS will research request for MHS data that include PHI. These requests must be reviewed for HIPAA compliance by the DHA Privacy Board.

Additionally, UCS has a Data Sharing Agreement (DSA) in place (DSA#19-2072), per DHA regulations. The DSA controls the disclosure, use, storage and/or destruction of MHS data that is managed by DHA to ensure compliance with privacy and security requirements applicable to PII and 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)

The applicant submits information in person using a web form within <https://edq.med.navy.mil/>.

**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.

Unscheduled. Retain as permanent. LIMDU SMART MAAG Project Team coordinating with BUMED Records Management Team to determine retention instructions.

**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.

**SORN Authorities:**

10 U.S.C. 55 Medical and Dental Care; 10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection from Third Party Payers Act; 44 U.S.C. 3101, Records management by agency heads; 5 CFR 293.502, Subpart E, Employee Medical File System Records; 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.

LIMDU SMART MAAG does not collect information from the public; OMB Control Number is not applicable.