

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:

Video Network Center (VNC)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

12/10/24

Infrastructure & Operations (I&O) Division

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 Defense Health Agency (DHA) Video Network Center (VNC) provides worldwide and up-to-date videoconferencing, audio bridging, Automated Call Distribution (ACD), as well as other enterprise telecommunications capabilities for DHA health care providers, patients, senior leadership, Military Health System (MHS), staff, academia, the health care industry, and other DoD or federal organization's customers. The service is provided in order to satisfy telemedicine, distance learning, and administrative requirements in support of medical service to the soldier. Videoconferencing technology is used by the organization to promote effective communication between users by virtually eliminating geographical borders, thus potentially decreasing manpower expenses associated with multiple or extensive Temporary Duty Assignments (TDY). The VNC ACD system is utilized by DHA Medical Treatment Facilities (MTFs) that cannot receive this support from their local post, camp or station.

T-Metrics Automated Call Distribution (ACD) is a VNC subsystem used for recording phone calls for quality control (supervisor review) and voicemails. PII/PHI is not explicitly requested/collected, however, customers may provide PII/PHI for use in appointment scheduling or similar use cases. Any PII/PHI provided would be temporarily retained as data files stored on a file server. Data files are configured to be deleted after 30 days. This is exclusively used for customer contact by the MTF only and is limited to authorized user groups. No data is stored in any way that can be searched or cross-referenced by PII/PHI fields.

Cisco ACD is a VNC subsystem used for voicemail. PII/PHI is not explicitly requested/collected, however, customers may provide PII/PHI for use in appointment scheduling or similar use cases. Any PII/PHI provided would be temporarily retained as data files stored on a file server. Data files are configured to be deleted after 30 days. This is exclusively used for customer contact by the MTF only and is limited to authorized user groups. No data is stored in any way that can be searched or cross-referenced by PII/PHI fields.

RightFax is an electronic FAX solution. Any PII/PHI provided would be temporarily retained as data files stored on a file server. Incoming faxes are temporarily stored on the RightFax web server and deleted as soon as they are saved to the file share then automatically deleted. Outgoing faxes are temporarily stored on the RightFax web server until the fax has been delivered to the recipient then automatically deleted. File server data files are configured to be deleted after 30 days. No data is stored in any way that can be searched or cross-referenced by PII/PHI fields.

VNC is owned and operated by DHA.

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/PHI may exist in voicemail message format left by system users. The intended use of PII/PHI is for user verification and administrative responses/actions only. The system is configured to delete all read/unread voicemails after a 30-day period.

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.

Leaving a voicemail or discussing PII/PHI over the phone, as well as the information in the call or voicemail, is optional and provided at the user's discretion. Faxes sent and received between providers are covered by the same HIPAA guidelines and documentation regulations as all other PII/PHI used for treatment by the MTFs.

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.

Leaving a voicemail or discussing PII/PHI over the phone, as well as the information in the call or voicemail, is optional and provided at the user's discretion. Faxes sent and received between providers are covered by the same HIPAA guidelines and documentation regulations as all other PII/PHI used for treatment by the MTFs.

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

VNC does not directly collect PII/PHI from individuals, but may be provided voluntarily. Therefore, no Privacy Act Statement or Privacy Advisory is required. Faxes sent and received between providers are covered by the same HIPAA guidelines and documentation regulations as all other PII/PHI used for treatment by the MTFs.

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. MTF healthcare providers

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

Specify. Line Service Healthcare Providers outside of DHA

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

Specify. Veteran's Affairs

☐ 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. Commercial Providers

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

VNC does not directly collect PII/PHI from individuals, but may be provided voluntarily in voicemail messages left by system users for reference only.

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)

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://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.

There is no way to retrieve any PII/PHI by name or other unique identifier. The only PII/PHI is in voicemail format.

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: 1601-17

DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate).

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.

PII /PHI is not directly collected. Patients have the option to leave a voicemail for MTF healthcare providers to schedule an appointment or request a call back instead of the patient potentially making multiple calls to talk directly to a healthcare provider. Patients can also use the MHS Genesis online functions instead of placing a call.

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.

This system only receives incidental PII/PHI left by users via ACD phone call or voicemail services, and the opportunity to object is at the customers discretion when contacting an MTF. All electronic FAX data is covered by the same HIPAA guidelines and documentation regulations as all other PII/PHI used for treatment by the MTFs.