

## 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:**

Asteres ScriptCenter Delivery Unit v1.X

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

07/17/2025

Healthcare Operations, Pharmacy Operations 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.**

Asteres ScriptCenter Delivery Unit is a commercial-off-the-shelf (COTS) product utilized to deliver medications to patients. ScriptCenter enables self-service pickup of finished prescriptions for retail pharmacy. The system has two implementation methods, one is as a standalone system, and the other is connected to the MTF network which communicates with the healthcare facility's patient care systems. CHCS batches the fills for each location such that all prescriptions for the ScriptCenter are processed at one time. After the batch is complete, the prescriptions are linked to ScriptCenter containers in bags with a bar-code label pre-attached and loaded by placing prescriptions in a ScriptCenter tray and placing the tray in the unit. When the doors have closed, ScriptCenter inventories all prescriptions in trays for patient pickup. The ScriptCenter LS (locker) unit is loaded interactively; pharmacy staff scan the barcode on the ScriptCenter container, place the item into any available locker, and then confirm the load. Pharmacy staff manage the system and access reporting via the web browser on their existing workstations.

The PII/PHI collected includes: patient name, date of birth, DEERS identification number, sex, race, address, telephone number, email address, prescription information, session record information, signature and picture. Categories of individuals includes: active-duty military (all services + Reserve), Coast Guard, National Guard, veterans, dependents, retirees and/or their dependents, contractors, foreign nationals.

**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)

The intended use is to provide continuity of care, for verification and identification required for billing and supply purposes to ensure that a prescription is provided to the right patient, in the right form, and at the right dose; and to ensure accuracy when reports are integrated into the individual Integrated Electronic Health Record (iEHR).

**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.

ScriptCenter collects PII directly from the system of record, MHS GENESIS.

**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.

ScriptCenter receives PII from MHS GENESIS.

**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

ScriptCenter does not collect PII directly from the patient - it is not the source system. ScriptCenter receives all PII from MHS GENESIS.

**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 physicians, pharmacists, and nurses.
<input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	Department of Homeland Security; US Coast Guard
<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.	Asteres contract language Specifically references DHA Procedures, Guidance and Information 224.90. The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with DFAR Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," May 8, 2007, and DoD 5400.11-R, "DoD Privacy Program," May 14, 2007. The Contractor shall also comply with federal laws relating to freedom of information and records management.
<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 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	

MHS GENESIS; Composite Health Care System (CHCS); Cerners Military Health System; Innovation Associates Symphony workflow system; ScriptPros SPCentral workflow system; or Parata Systems Pharmacy 2000 prescription system

**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 checked="" type="checkbox"/> Other (If Other, enter the information in the box below)	

Biometric data is captured in ScriptCenter for identification purposes, providing authorized users the option to select the fingerprint reader as the preferred method of authentication. Fingerprint images are not maintained, but rather used to obtain the necessary data points required to create a fingerprint match. Pictures taken from the camera (individuals face and signature) are solely used for auditing purposes. This capability allows the pharmacy to be able to verify the individual who collected a specific medication or product.

**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.dod.mil/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 5.2, item 020 (DAA-GRS-2022-0009-0002)

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

(3) Retention Instructions.

FILE NUMBER: 103-14

FILE TITLE: Intermediary Records

DISPOSITION: Temporary. Cut off and destroy upon creation or update of the final record, or when no longer needed for business use, whichever is later. (For Pharmacy records transfer into the Consolidated Health Records Schedule)

Pharmacy Program Records: currently under development

**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 Ch. 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 USC 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 USC 42 U.S.C. 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 6025.18-R, DoD Health Information Privacy Regulation

**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.

OMB approval is not required for the information collected in this system for the diagnosis and treatment of medical conditions and is not considered a public information collection per DoDM 8910.01, V2, Encl 3, paragraph 8b(5). This system does not collect information from members of the public. ScriptCenter collects data from MHS GENESIS which is responsible for providing OMB Control Number.