

## 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:

PICKPOINT Will Call System (WCS) /Remote Dispensing System (RDS) v2.x

### 2. DOD COMPONENT NAME:

Defense Health Agency

### 3. PIA APPROVAL DATE:

07/30/2025

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.**

The PickPoint Will Call System (WCS)/Remote Dispensing System (RDS), is a light-guided bagging system. WCS is operated in the pharmacy using the PickPoint application named inteleWare. The three main features of WCS are loading, handout, and return-to-stock. WCS stores patient prescriptions until they are ready to be picked up using the barcode labeled on each bag. Pharmacy staff use inteleWare to look up the patient information on their pharmacy workstation. WCS reduces drug retrieval via barcode to load into the patient's Will Call System (WCS) bag, where the information is stored until the patient picks up the medication. Once pick up is made, the information is stored on the PickPoint encrypted hard drive for reporting and audit purposes.

The PII collected includes demographic information, personal contact information, medical information, and Protected Health Information (PHI), including prescription drug information. The categories of individuals on whom PII/PHI is collected include active duty military, retirees and their family members.

**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 used to identify and verify PII/PHI prior to prescription loading to ensure that a prescription is provided to the correctly identified patient/bag. The use of PII is for mission-related purposes and intended to track patient prescriptions from dispense to handout.

**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.

PickPoint receives PII from 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.

PickPoint 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

PickPoint WCS/RDS does not collect PII directly from individuals, no Privacy Act Statement or Privacy Advisory is required.

**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. Contractor is PickPoint. Contract language includes language to safeguard PII including FAR clauses: 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and FAR 39.105, Privacy. When the contractor has access to PHI, a HIPAA Business Associate Agreement is also required. PickPoint support staff access WCS during the onsite installation. Support staff are required to follow DoD personnel security policies when granted access to sensitive information. Contract language states: PickPoint agrees to use administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic PHI or PII it creates, receives, maintains, and transmits in the execution of their Contracts.

☐ 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

MHS GENESIS

**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://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 5.2, 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.

5 USC 301, Departmental Regulations; 10 USC Chapter 55, Sections 1071-1097b, Medical and Dental Care ; 42 USC Chapter 117, Sections 11131-11152, Reporting of Information; DoDM 6025.18, Implementation Of The HIPAA Privacy Rule in DoD Health Care Program; DoD 6010.8-R, CHAMPUS; DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities: Foreign Service Care; Third-Party Collection; Beneficiary Counseling and Assistance Coordinators (BCACs); Pub.L. 104-91, Health Insurance Portability and Accountability Act of 1996.

**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 for the diagnosis and treatment of medical conditions and does not collect PHI/PII directly from individuals. It is not the initial point of collection for any PHI/PII and is not considered a public information collection IAW DoDM 8910.01, V2, Encl 3, paragraph 8b(5).