

## 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:**

Pharmacy Inpatient Automation Solution - Enterprise (PIAS-E)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

08/07/2025

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 Pharmacy Inpatient Automation Solution-Enterprise (PIAS-E) is a Commercial off the Shelf (COTS) solution from Becton Dickinson that provides automated management of medications to inpatients. The PIAS-E provides medication storage, dispensing, tracking, and workflow management capabilities that enable the delivery of efficient, safe, and timely care. The PIAS-E maintains detailed dispensing information, which enables increased security, accuracy and accountability of medications. Patient safety enhancements that reduce the risk of medication errors are realized through the utilization of embedded checks and balances employed within the workflow management software. Standardized workflows increase productivity and efficiencies associated with medications, which facilitates a culture focused on direct patient care

Demographic information is required to identify the patient and the medication being prescribed. PIAS-E collects the patient name, DEERS identification number, sex, race, visit number, birth date, and medical record number from MHS GENESIS as it related to a specific event..

**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)**

Provision of patient care; Mission-related patient care. The use of PII is administrative and intended to track patient related events. If applicable, this information can be used to match & reconcile patient records with other systems. PII is aggregated on the device from the accredited Hospital system of record (i.e. MHS GENESIS) to identify and verify PHI/PII prior to treatment. Verification and identification to ensure that a prescription is provided to the right patient, in the right form, and at the right dose. This system is used to deliver medication to inpatients. The system uses the PII for identification and verification as well as billing purposes in order to ensure supplies are provided for the right patient at the right time.

**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.

PIAS-E does not collect PII directly from the patient - it is not the source system. PIAS-E receives all 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.

PIAS-E does not collect PII directly from the patient - it is not the source system. PIAS-E receives all 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

This system does not collect PII directly from the individual. PIAS-E receives its data from MHS GENESIS, which are responsible for ensuring that the patient has consented to the collection of PII. Therefore 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.

Authorized DHA pharmacy staff will have access to PII as part of their duties. Vendor authorized personnel will have access to the system to perform support and maintenance. Information is shared with authorized DoD health care providers and managers within the DHA. PII information will also be shared with DHA MTF physicians, pharmacists, and nurses.

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.

Becton, Dickinson and Company (BD) support staff will access the servers in the performance of their support for maintenance, patching, and repair roles. BD Support staff are required to follow DoD personnel security policies when granted access to sensitive information. FAR privacy clauses 52.224-1 and 52.224-2 are included in the PIAS-ADC (E) Solicitation/Performance Work Statement (PWS). Furthermore, Attachment 3 of the PWS details the safeguards surrounding contractor access to DOD systems and data, including Privacy information.

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)

For Pharmacy systems (along with any other system that communicate with MHS GENESIS): The source for PII will be collected from an existing accredited Hospital Information system or Health Record system within the DoD. The patient demographics data is collected and feeds the information to the accredited Pharmacy system.

**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.

PIAS-E is not a system of record. This system does not collect PII directly from the individual. PIAS-E receives its data from MHS GENESIS, which are responsible for ensuring that the patient has consented to the collection of PII.

**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)

**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 U.S.C., Chapter Ch. 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. 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 disorders and is not considered a public information collection in accordance with DoDM 8910.01, V2, Encl 3, paragraph 8b(5). This system does not collect

information from members of the public. The system collects the data from MHS GENESIS which is responsible for providing OMB Control Number.