

## 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 Outpatient Automation Solution - ScriptPro (POAS-S)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/15/2025

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 Outpatient Automation Solution - ScriptPro (POAS-S) system is comprised of the ScriptPro SP Central System with Telepharmacy Remote Dispensing and Verification System (TRDVS). It is an Automated Information System (AIS). The main purpose of the system is to automate the filling of prescriptions and to serve as a workflow management tool within the pharmacy to provide accurate, verified and efficient drug dispense by use of state of the art robotic technology. SP Central works with the existing pharmacy computer system and utilizes barcode scanning controls to ensure prescription accuracy. This advanced workflow technology directs the dispensing process from point of entry to patient delivery.

The types of PII collected in the system include name, birth date, prefix (an assigned number), sex of patient, and prescription number.

**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)

Verification and identification to ensure that a prescription is provided to the right patient, in the right form, and at the right dose. The intended use is mission-related - patient care.

**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.

POAS-S does not collect PII directly from the patient - it is not the source system. POAS-S 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.

POAS-S does not collect PII directly from the patient - it is not the source system. POAS-S 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. POAS-S 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.

The authorized 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.

☐ 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 name is ScriptPro. ScriptPro is required to comply with standard MHS Business Associate Agreement (BAA) language. In accordance with DoD 6025.18-R "Department of Defense Health Information Privacy Regulation" the Contractor meets the definition of Business Associate. Therefore, a Business Associate Agreement is required to comply with both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security regulations. This clause serves as that agreement whereby the Contractor agrees to abide by all applicable HIPAA Privacy and Security requirements regarding health information as defined in this clause, and DoD 6025.18-R and DoD 8580.02-R, as amended. Additional requirements will be addressed when implemented.

☐ 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://dpcltd.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.

**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.