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:

IMS Dental Imaging and Infrastructure (IMSDII)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

10/28/2026

Assistant Director for Healthcare Administration and Operations/Medical Devices and Equipment (MDE) PMO

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 Image Management Systems Dental Imaging and Infrastructure (IMSDII) provides comprehensive digital dental imaging capabilities and medical image access. IMSDII encompasses a collection of centralized dental imaging servers and software applications utilized by dental providers to process, archive, view, and retrieve digital dental images. This clinical diagnostic data is critical for treating service members, conducting forensic identification, and monitoring overall dental health and readiness. IMSDII serves as the Army Dental Digital Repository (ADDR) a central digital archive for all dental image data across enterprise.

Personally Identifiable Information (PII) collected includes demographic data, SSN, medical and dental information, contact information, employment information, Protected Health Information (PHI) and military records.

The categories of individuals about whom PII and PHI are collected include Active Duty, Reserve, and National Guard Service Members (Army, Navy, Marine Corps, Air Force, and Space Force); retired military members; family members and dependents Department of Defense (DoD) civilian employees (including non-appropriated fund employees); DoD contractor personnel; Public Health Service (PHS) personnel; and individuals authorized to receive dental care or emergency medical treatment at a DoD Dental Treatment Facility (DTF).

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 support the delivery of dental care services, identification purposes, to match an individual with dental and medical diagnostic reports and images, and ensure accuracy when integrated in the individual's dental records, monitor military unit readiness.

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.

Individuals have the opportunity to object to the collection of their PII during the dental intake and clinical treatment process using DD Form 2005 during intake to explicitly review and acknowledge how their PII/PHI is collected, utilized, and shared within DoD health systems.

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.

Individuals have the opportunity to consent to the specific use of their PII during intake and clinical treatment process using DD Form 2005.

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

AUTHORITY: PL104-191, HIPAA of 1996; 10 USC, Ch 55, Medical and Dental Care; 10 USC 1079, Contracts for Medical Care for Spouses and Children; 10 USC 1079a, TRICARE Program Treatment of Refunds and Other Amounts Collected 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; 10 USC 1097a, TRICARE Prime Automatic Enrollments; Payment Options; 10 USC 1097b, TRICARE Prime and TRICARE Program Financial Management; 42 USC 290dd-2, Confidentiality of Records; 42 USC Ch 117, Sect 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in MTFs; DoDM 6025.18, Implementation of the HIPAA Privacy Rule in DoD Health Care Programs; and EO 9397 (SSN), as amended.

PURPOSE: Collect information required to provide and document dental care; archive, view, and retrieve digital dental images for diagnosis, treatment, dental readiness tracking, evaluate fitness for duty and medical concerns, and reporting dental care for the Department of Defense (DoD); determine eligibility for benefits and entitlements; adjudicate claims; determine third party responsibility for the cost and recovery of Military Health System (MHS) provided healthcare; evaluate the MHS and its programs; and perform administrative tasks related to MHS operations and personnel readiness. Collect information on the training and qualifications of individuals conducting research. or Dental Treatment Facility (DTF) providers to process.

ROUTINE USES: Information in your records may be disclosed to: Private physicians and Federal agencies, including Veterans Affairs, Health and Human Services, and Homeland Security (with regard to members of the Coast Guard), in connection with your medical care; Government agencies to determine your eligibility for benefits and entitlements; Government and non-government third parties to recover the cost of MHS provided care; Public health authorities to document and review occupational and environmental exposure data; and Government and non-government organizations to perform DoD approved research. Information may be used for other lawful reasons which include teaching, compiling statistical data, and evaluating the care rendered. Use and disclosure of your records outside of DoD may occur per 5 USC 552a(b) of the Privacy Act of 1974, as amended. Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented by DoD 6025.18-R. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

DISCLOSURE: Voluntary. However, failure to provide the requested information, may prevent the DTF to process or archive your digital dental images in IMSDII. The inability to track and report your dental readiness status, may cause administrative delays, affect your deploy ability status, or impact your eligibility for certain operational assignments. Active treatment and emergency dental care will not be denied.

APPLICABLE SORN: EDHA 07, Military Health Information System (June 15, 2020; 85 FR 36190) https://dpcld.defense.gov/Portals/49/Documents/Privacy/SORNs/DHA/EDHA-07.pdf

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)/Dental Treatment Facilities (DTFs)
☒ Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	Army, Navy, Air Force and Space Force, US Coast Guard, Air National Guard
☒ Other Federal Agencies *(i.e. Veteran's Affairs, Energy, State)*	Specify.	Veteran's Affairs (VA)
☐ 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.	LaweLawe is contracted to provide operational, technical, and administrative support and sustainment services and therefore has access to IMSDII. Contractual language to safeguard PII and/or PHI includes: "The Contractor shall comply with DoDD 5400.11 DoD Privacy Program; DoDD 8500.1, Information Assurance (IA); DoDI 8500.2, IA Implementation; DoDM 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs, and DoD 5200.2-R, Personnel Security Program Requirements.
☐ Other *(e.g., commercial providers, colleges).*	Specify.	TRICARE Dental Program; United Concordia Companies, Inc. network dental providers, as required to support the delivery of referred patient care.

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

Existing Systems: Defense Enrollment Eligibility Reporting System (DEERS); Dental Integration Service Center (DISC) - Corporate Dental System (CDS); Dental Classification (DenClass) Module; QTC Medical Services - Reserve Health Readiness Program (RHRP); IMSDII Patient Import Portal (PIP); IMSDII EDP (Enterprise DICOM Process) Executive Dashboard.

Commercial Systems: QTC Medical Services - Reserve Health Readiness Program (RHRP)

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 EDHA 07

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.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.

l. 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.

Mission Schedules:
- N1-330-10-003, item 1
- N1-330-01-002, item 2
- N1-330-01-002, item 4a
- N1-330-01-002, item 4b
- N1-330-01-002, item 4c
- N1-330-01-002, item 5
- N1-330-01-002, item 6
- N1-330-01-002, item 7b
- N1-330-01-002, item 10
- N1-330-01-002, item 11
- N1-330-01-002, item 14
- N1-330-01-002, item 15
- N1-330-01-002, item 16

Other Schedules:
- System Access Records: GRS 3.2, item 030 (DAA-GRS-2013-0006-0003),
- Data Administration and Documentation: GRS 3.1, item 051 (DAA-GRS-2013-0005-0003)

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

(3) Retention Instructions.

Mission Schedules:
FILE NUMBER: 927-01
FILE TITLE: Armed Forces Military Service Treatment Record (STR)
claims) located at Federal Records Centers (FRCs).
DISPOSITION: Temporary. Cut off after the date of separation of the member from the Armed Services. Destroy 100 years after cutoff.

FILE NUMBER: 927-02
FILE TITLE: Outpatient Records of Retired/Family Members/NATO/Non-NATO Foreign National/Army ROTC, Army Reserve, Army National Guard on training of less than 30 days/Others
DISPOSITION: Temporary. Cut off after the end of the calendar year of the last date of treatment. Retire to the National Personnel Records Center (NPRC) two years after cutoff. Destroy 50 years after cutoff.

FILE NUMBER: 927-03
FILE TITLE: Inpatient, Extended Ambulatory Records and Fetal Monitoring Strips – Teaching Facilities
DISPOSITION: Temporary. Cut off after the end of the calendar year of the last date of treatment. Retire to the National Personnel Records Center (NPRC) 5 years after cutoff. Destroy 50 years after cutoff.

FILE NUMBER: 927-04
FILE TITLE: Inpatient, Extended Ambulatory Records and Fetal Monitoring Strips – Military Treatment Facilities
DISPOSITION: Temporary. Cut off after the end of the calendar year of the last date of treatment. Retire to the National Personnel Records Center (NPRC) 1 year after cutoff. Destroy 50 years after cutoff.

FILE NUMBER: 927-05
FILE TITLE: Inpatient, Extended Ambulatory Records and Fetal Monitoring Strips – Non-Fixed Medical Facilities
DISPOSITION: Temporary. Cut off after the end of the calendar year of the completion of the records or upon closure of treatment center MTF or rotation to another military department, whichever is first. Retire to the National Personnel Records Center (NPRC), return to parent unit medical record department, or hold in theater holding area no later than 1 year after cutoff. Destroy 50 years after cutoff.

FILE NUMBER: 927-06
FILE TITLE: Retired Military/Family Members and Non-NATO Foreign National Dental Records
DISPOSITION: Temporary. Cut off after the end of the calendar year of the completion of last treatment. Destroy 3 years after cutoff.

FILE NUMBER: 927-07
FILE TITLE: Civilian Employee Dental Records
DISPOSITION: Temporary. Cut off after the end of the calendar year of the completion of last treatment. Destroy 3 years after cutoff.

FILE NUMBER: 927-08
FILE TITLE: Military Academy Cadet/Midshipman Dental Records
DISPOSITION: Temporary. Cadets/midshipman who do enter active duty should carry records to their next command. For cadets/ midshipman who do not enter active duty, cut off upon separation. Destroy 5 years after cutoff.

FILE NUMBER: 927-11
FILE TITLE: Entrance and Separation X-ray Films
DISPOSITION: Temporary. Cut off and retain x-rays, along with all additional films taken as a result of questionable anomalies that do not result in an applicant being rejected, no longer than 4 months after creation. Retire x-ray film to NPRC 111 Winnebago Street, St Louis, MO. 63118. VA is authorized custodian of records after transfer (VA schedule RCS VB-1, Part 1, Section XIII (13-061.100)). Destroy in accordance with current VA disposition instructions.

FILE NUMBER: 927-12
FILE TITLE: X-ray Films on Applicants Accepted by Military Academies and preparatory schools.
DISPOSITION: Temporary. Cut off after date of last film. Destroy 5 years after cutoff.

FILE NUMBER: 927-15
FILE TITLE: X-ray Films on Applicants and Registrants Rejected for Other than Medical Reason
DISPOSITION: Temporary. Cut off and destroy immediately.

FILE NUMBER: 927-16
FILE TITLE: Routine Employment X-ray Films (not related to Occupational Illness, Injury or Accident) on Civilian Employees
DISPOSITION: Temporary. Cut off after date of last film. Destroy 5 years after cutoff.

FILE NUMBER: 927-17
FILE TITLE: Diagnostic X-ray Films
DISPOSITION: Temporary. Cut off after the end of the calendar year in which the last film was taken. Destroy 5 years after cutoff.

Other Schedules:
FILE NUMBER: 1601-02
FILE TITLE: System Access Records - Systems not requiring Special Accountability for Access
DISPOSITION: Temporary. Cut off and destroy when business use ceases.

FILE NUMBER: 1601-12
FILE TITLE: Data Administration and Documentation - Temporary Systems
DISPOSITION: Temporary. Cut off after the project/activity/transaction is completed or superseded, or the associated system is terminated, or the associated data is migrated to a successor system. Destroy 5 years after cutoff.

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 statue 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.

PL 104-191 Health Insurance Portability and Accountability Act of 1996; 10 USC Ch 55, Medical and Dental Care; 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; 10 USC 1097a, TRICARE Prime Automatic Enrollments; Payment Options; 10 USC 1097b, TRICARE Prime and TRICARE Program Financial Management; 42 USC 290dd-2, Confidentiality of Records; 42 USC Ch 117, Sect 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); DoD 6025.18-R, DoD Health Information Privacy Regulation; and EO 9397 (SSN).

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 Control Number: 0720-0022
Collection Title: Department of Defense Active Duty/Reserve/Guard/Civilian Forces Dental Examination (DD Form 2813)
Expiration Date: May 31, 2029