



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Defense Occupational and Environmental Health Readiness System – Hearing Conservation (DOEHRS-HC)
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Defense Health Agency (DHA)
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### **SECTION 1: IS A PIA REQUIRED?**

**a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).**

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel\* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

\* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

**b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.**

**c. If "Yes," then a PIA is required. Proceed to Section 2.**

**SECTION 2: PIA SUMMARY INFORMATION**

**a. Why is this PIA being created or updated? Choose one:**

- New DoD Information System
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

**b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?**

- Yes, DITPR**      Enter DITPR System Identification Number
- Yes, SIPRNET**      Enter SIPRNET Identification Number
- No**

**c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?**

- Yes**
- No**

If "Yes," enter UPI

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

**d. 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 should be consistent.

- Yes**
- No**

If "Yes," enter Privacy Act SORN Identifier

DoD Component-assigned designator, not the Federal Register number.  
Consult the Component Privacy Office for additional information or  
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

**Date of submission for approval to Defense Privacy Office**

Consult the Component Privacy Office for this date.

**e. Does this DoD information system or electronic collection have an 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**

**Enter OMB Control Number**

**Enter Expiration Date**

**No**

**f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.**

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

5 U.S.C. 301, Departmental regulations; 10 U.S.C. 1074f, Medical tracking system for members deployed overseas; DoD Directive 6490.02E, Comprehensive Health Surveillance; DoD Instruction 6490.03, Sec. E4.A2.7, Deployment Health; DoD Instruction 6055.1, Sec. 4.1, DoD Safety and Occupational Health (SOH) Program; DoD Instruction 6055.12, Hearing Conservation Program (HCP); and E.O. 9397 (SSN), as amended.

**g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.**

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

The Defense Occupational and Environmental Health Readiness System – Hearing Conservation (DOEHRS-HC) is an information system designed to support personal auditory readiness and help prevent hearing loss through early detection. DOEHRS-HC collects, maintains, compares and reports hearing readiness, deployment and hearing conservation program data for Department of Defense (DoD) personnel.

DOEHRS-HC collects the following Personally Identifiable Information (PII) / Protected Health Information (PHI) for Military personnel and supporting civilian staff (i.e., Active Duty, Reserve, Guard, and civilian staff):

- Name
- Social Security Number (SSN)
- Birth Date
- Gender
- Employment Information
- Military Records
- Medical Information

System point of contact:  
DOEHRS Technical Manager  
Defense Health Services Systems  
7700 Arlington Boulevard  
Falls Church, VA 22042-5101

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

One privacy risk associated with DOEHRS-HC that is general to all systems is that a user may inadvertently or intentionally disclose PII / PHI to an unauthorized user. To help mitigate this risk, users are required to take annual Privacy Act, Health Insurance Portability and Accessibility Act (HIPAA), and Computer Security Awareness Training. Role-based access controls are in place to allow only appropriate users to access data.

A privacy risk that is unique to the system involves the training database installed with the DOEHRS-HC application. "Training Mode" is not intended to accommodate actual hearing tests or DoD personnel demographic data; however, should a user inadvertently enter or collect "real" data in Training Mode, it is required that the incident is reported to the local Hearing Conservation Program Manager (HCPM) and to the MHS Help Desk for assistance.

Another privacy risk associated with DOEHRS-HC is that hard copy printable reports may contain PII / PHI that may be vulnerable if not properly handled (with proper physical access controls on site) or properly sanitized (i.e., shredded or burned) after use.

Enclosure E of the DOEHRS-HC User Manual specifically addresses privacy and security issues in the system and how they should be addressed by personnel. Mandated physical access controls and proper sanitization processes (i.e., shredded or burned) are in place to safeguard privacy.

Risks regarding the collection, use, and sharing of PII / PHI in the system have been minimized through system design and implementation of various administrative, technical, and physical security controls as directed by DoDI 8500.2, "Information Assurance Implementation (IA)," dated February 6, 2003, and DoD 6025.18-R, "DoD Health Information Privacy Regulation," dated January 24, 2003.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.**

**Within the DoD Component.**

Specify.

DOEHRS-HC DR - The DOEHRS-HC DR is the data warehouse for the stand alone application, DOEHRS-HC. Data captured by DOEHRS-HC is exported to the DOEHRS-HC DR for storage and reporting purposes.

**Other DoD Components.**

Specify.

The Army Medical Protection System (MEDPROS)

**Other Federal Agencies.**

Specify.

United States Department of Veterans Affairs (VA)

**State and Local Agencies.**

Specify.

**Contractor** (Enter name and describe the language in the contract that safeguards PII.)

Specify.

**Other** (e.g., commercial providers, colleges).

Specify.

**i. Do individuals have the opportunity to object to the collection of their PII?**

**Yes**

**No**

(1) If "Yes," describe method by which individuals can object to the collection of PII.

Submission of information is voluntary. If an individual chooses not to provide PII/PHI information, they will not be subject to any criminal penalties. However, failure to provide this information may result in removal from duties, punishment by commander or supervisor, and/or subject to other negative actions.

(2) If "No," state the reason why individuals cannot object.

**j. 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 do not have the opportunity to consent to the specific uses of their PII / PHI; however, routine uses of the PII / PHI are listed in the Privacy Act Statement for the system made available to all individuals before PII / PHI is collected. Specifically, all uses and disclosures will be for the express and limited purpose of record-keeping processes necessary for identifying potential exposures and mitigation of noise hazards in the workplace; and, available only to those individuals with a bona-fide need to know in the performance of their duties (and consistent with proper training).

**k. What information is provided to an individual when asked to provide PII data?** Indicate all that apply.

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> <b>Privacy Act Statement</b> | <input type="checkbox"/> <b>Privacy Advisory</b> |
| <input type="checkbox"/> <b>Other</b>                            | <input type="checkbox"/> <b>None</b>             |

Describe each applicable format.

A Privacy Act Statement (PAS) is given to individuals from whom the PII / PHI is collected by a DOEHRS-HC technician.

**AUTHORITY:** 5 U.S.C. 301, Departmental regulations; 10 U.S.C. 1074f, Medical tracking system for members deployed overseas; DoD Directive 6490.02E, Comprehensive Health Surveillance; DoD Instruction 6490.03, Sec. E4.A2.7, Deployment Health; DoD Instruction 6055.1, Sec. 4.1, DoD Safety and Occupational Health (SOH) Program; DoD Instruction 6055.12, Hearing Conservation Program (HCP); and E.O. 9397 (SSN), as amended.

**PURPOSE:** To collect hearing related information from you in order to evaluate your ability to hear, determine whether that ability is decreasing, and prevent hearing loss across DoD.

**ROUTINE USES:** Your records may be disclosed to the Department of Veterans Affairs (VA) in order to provide medical care, determine your eligibility for benefits, determine your entitlement to benefits, coordinate cost sharing activities, and facilitate collaborative research activities between the DoD and VA. Use and disclosure of your records outside of DoD may also occur in accordance with the DoD Blanket Route Uses and as permitted by the Privacy Act of 1974, as amended (5 U.S.C. 552a(b)).

**DISCLOSURE:** Although providing information is voluntary, in that you will not be subject to any criminal penalties for not providing the information, failure to do so may result in you being removed from your duties or being subject to other negative actions.

**NOTE:**

**Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.**

**A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.**