



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Delta Dental Federal Government Programs (DDFGP) Information System (IS)
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TRICARE Management Activity (TMA) / Managed Care Support Contractor (MCSC)
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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 New Electronic Collection
- Existing DoD Information System Existing Electronic Collection
- Significantly Modified DoD Information System

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

DTMA 04

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

0720-0015

Enter Expiration Date

Renewal in Progress

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.

10 U.S.C. Chapter 55, Medical and Dental Care; 38 U.S.C. 1781, Medical Care for Survivors and Dependents of Certain Veterans; 32 CFR 199.22, TRICARE Retiree Dental Program (TRDP); 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 TRICARE Retiree Dental Program (TRDP) has been the premier dental benefits plan since it was created by Congress and made available to uniformed services retirees and their family members on February 1, 1998. In 2000, Congress authorized enhancements to the TRDP to provide an unprecedented comprehensive scope of benefits that included major services like crowns, bridges, dentures and orthodontics. Additional services were added in fall of 2008, and eligibility for this expanded scope of benefits was extended to uniformed services retirees worldwide.

TRDP is a voluntary, premium-based dental benefits program with 100 percent of the premium paid by the enrollee. Delta Dental of California (DDC) Delta Dental Federal Government Programs (DDFGP), along with partner Delta Dental of Michigan (DDMI), administers TRDP, under contract with the TRICARE Management Activity (TMA). Delta Dental Federal Government Programs Information System (DDFGP-IS) is the electronic system used to administer TRDP. (Note: TRDP is separate from the TRICARE Dental Program, which is available only to family members of active duty and reserve members and the reserve members themselves.)

DDFGP-IS offers the following services and benefits to enrollees:

- Enrollment management (to include managing a user's own, reenrollments, adding a spouse, and adding dependants);
- Detailed benefits, eligibility, and information on services covered;
- Review of billing transactions (i.e., transaction history and account statements);
- Review of claims, reimbursement, and payment information;
- Print new insurance cards and claims forms;
- View and edit a user's profile (to include password management); and
- Find participating dentist in a user's area.

TRDP is available to the following categories of individuals:

- A member of the Uniformed Services who is entitled to uniformed services retired pay, even if 65 or older.
- A member of the retired National Guard / Reserve, including those in the "gray-area" who are entitled to retired pay but will not begin receiving it until age 60.
- A current spouse of an enrolled member.
- A child of an enrolled member, up to age 21 or to age 23 if a full-time student (proof of full-time student status required), or older if disabled before losing eligibility.
- An unremarried surviving spouse or eligible child of a deceased member who died while in retired status or while on active duty.
- A Medal of Honor recipient and eligible family members, or an unremarried surviving spouse / eligible family members of a deceased recipient.
- A current spouse and / or eligible child of a non-enrolled member with documented proof the non-enrolled member is: (a) eligible to receive ongoing comprehensive dental care from the Department of Veterans Affairs (VA); (b) enrolled in a dental plan through employment and the plan is not available to family

members; or (c) unable to obtain benefits through TRDP due to a current and enduring medical or dental condition.

The following personally identifiable information (PII) and protected health information (PHI) is collected and stored in DDFGP-IS about enrollees:

Enrollment, claims, inquiry, or grievance forms —

- Name
- Social Security Number (SSN) (Note: military retired persons enter their SSN and date of birth on the TRDP web site. This identifying information is used to retrieve information regarding their dental claims.)
- Gender
- Birth date
- Phone numbers (cell, home, and work phone)
- Personal e-mail address
- Mailing / home address
- Spouse information
- Marital status
- Child information
- Financial Information (credit card information; Explanation of Benefits (EOB) statements)
- Medical information
- Disability Information (to ensure preferred dentist has wheelchair access)
- Employment Information (dentist — online dentist inquiry form)
- Military records
- Education information (to confirm “student” status, if applicable)

TRDP offers coverage in the Continental United States (CONUS) and in all overseas locations and is available at over 150,000 locations worldwide.

TRDP has a PIA on file with the TMA Privacy and Civil Liberties Office, dated July 8, 2008. There have been no significant system changes to the PIA since that date.

TRDP is covered by Data Use Agreement (DUA) #11-835, dated September 19, 2011.

DDFGP-IS Point of Contacts (POCs):

Delta Dental of California (DDC)
Federal Government Programs
PO Box 537008 (for enrollment, eligibility, billing and all other requests)
PO Box 537007 (for claims submission)
PO Box 537006 (for enhanced-overseas claims submission)
Sacramento, CA 95853-7008
United States of America

Continental United States: 1-888-838-8737 (Monday – Friday, 6:00 AM – 6:00 PM PST)
International: 1-866-721-8737
Privacy Department: 1-866-471-8946

Online Customer Service Inquiry Form: <https://secure.ddpdelta.org/forms/web/CSIquiry.aspx>

Online Dentist Inquiry Form: <https://secure.ddpdelta.org/forms/web/DDSInquiry.aspx>

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

The privacy risks associated with DDFGP-IS are similar to other web-based electronic systems. To mitigate these risks, TRDP has fulfilled the following legal requirements necessary for all Federal health IT systems:

1.) TRDP has signed applicable confidentiality agreements to adhere to the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). TRDP may ask for confirmation of identification from parties who

call with questions about TRDP eligibility or claims as well as requests for personal health information.

2.) TRDP restricts access to information based upon the requirements of the Privacy Act of 1974, as amended. Some of these restrictions are outlined below:

- TRDP can only release personal information to the member to whom the information pertains if that member is age 18 or older. Written authorization is required from the member before TRDP can release information to others.
- The parent or legal guardian of a child under age 18 can receive information from TRDP on the minor child, provided the relationship to the minor child can be established.
- A legal guardian or custodial parent must establish proof of guardianship with TRDP in writing, prior to releasing information.

3.) When information is collected about children under the age of 13 who may receive benefits (via their parents or guardians) from TRDP, it is done so in compliance with the Children's Online Privacy Protection Act (COPPA). (Note: DDFGP-IS is not intended for children under the age of 13.) The information collected about children is that which is necessary to perform services for them.

In addition to fulfilling the legal requirements for Federal health IT systems, DDFGP-IS has put into effect many other security protocols to help mitigate any residual privacy risk that may exist. DDFGP-IS has appropriate technical, administrative, and physical procedures in place to protect personal information from loss, misuse, or alteration. Due to the rapidly evolving nature of information technologies, no transmission of data over the Internet can ever be fully guaranteed. TRDP takes steps to ensure that access to personal information is limited to individuals who have a business need consistent with the reason the information was provided. TRDP maintains personal information in accordance with records guidelines, and trains employees on appropriate privacy and security practices. Telephone calls are also routinely monitored on a random basis by TRDP management staff for employee training and quality control purposes.

If an enrollee registers through the web site, his or her personal information could potentially be compromised or improperly accessed if someone finds the password and uses it. If an enrollee suspects unauthorized use of the password, he or she should immediately take steps to change the password and notify TRDP of potentially fraudulent activity.

Within the DDFGP-IS web site, there may be links to web sites that do not belong to TRDP. These external web sites are not subject to the TRDP privacy statement as TRDP does not control those web sites. TRDP is not responsible for the privacy practices or the content of these external web sites.

When TRDP contracts with third parties to provide services that involve enrollee personal information, TRDP requires that they protect information in a manner similar to the protections TRDP offers.

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.

TMA

Other DoD Components.

Specify.

Defense Finance Centers; Defense Manpower Data Center (DMDC) Defense Enrollment Eligibility Reporting System (DEERS)

Other Federal Agencies.

Specify.

Information about enrollment and claim forms may be used to evaluate medical care provided to applicants for coverage under TRICARE programs and may be given to the Department of Health and Human Services (HHS)

and / or the Department of Homeland Security (DHS), consistent with their statutory administrative responsibilities under TRICARE; to the Department of Justice (DoJ) for representation of the Secretary of Defense in civil actions; and to congressional offices in response to inquiries made at the request of the person to whom a record pertains.

State and Local Agencies.

Specify.

Appropriate disclosures may be made to other Federal, State, Local and Foreign Government agencies on matters relating to entitlement, fraud, program abuse, program integrity, and civil and criminal litigation related to the operation of the TRICARE program.

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

Specify.

Delta Dental of California (DDC)
P.O. Box 997330
Sacramento, CA95899-7330
800-765-6003 (Monday – Friday 5:00 AM – 5:00 PM PST)

Delta Dental of Michigan (DDMI)
P.O. Box 9089
Farmington Hills, MI 48333-9089
800-524-0149
<http://www.deltadentalmi.com/PublicWeb/dispatcher/contact>

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

Specify.

Appropriate disclosures may be made to private business entities and individual providers of care on matters relating to entitlement, fraud, program abuse, program integrity and civil and criminal litigation related to the operation of the TRICARE program.

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.

Dental coverage is a choice of a retired military person and their beneficiaries. Full disclosure of the use of personal information is given to each enrollee.

If an individual refuses to provide information, however, comprehensive healthcare may not be possible. Inaccurate information can also affect timely and correct processing of claims and can delay receipt of payments and other important information regarding TRDP coverage.

(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.

Full disclosure of the use of personal information is given to each enrollee. The information is used to process dental claims. If an individual refuses to provide information, comprehensive healthcare may not be possible.

Consent to the specific uses of PII is obtained as necessary in accordance with DoD 5400.11-R, Department of Defense Privacy Program, C.4.1.3.

PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, DoD Health Information Privacy Regulation. Individuals are informed of these uses and are given the opportunity to authorize or restrict the use of their PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DoD 6025.18-R.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

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

Privacy Act Statement **Privacy Advisory**
 Other **None**

Describe each applicable format.

Because DDFGP-IS collects PII and PHI directly from individuals, a Privacy Act Statement (PAS) is required. The PAS submitted with the draft PIA was approved in November 2010 by both the TMA Privacy and Civil Liberties Office (Privacy Office) and TRDP. This version of the PAS is acceptable for use, and to the extent that it has already been incorporated into current forms, it is not necessary to update the PAS; however, for any forms that currently display this version of the PAS and will be revised for other reasons, a revised PAS is set forth below.

This statement serves to inform you of the purpose for collecting personal information required for the Delta Dental Federal Government Programs (DDFGP) Information System (IS) and how it will be used.

AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 38 U.S.C. 1781, Medical Care for Survivors and Dependents of Certain Veterans; 32 CFR 199.22, TRICARE Retiree Dental Program (TRDP); and E.O. 9397 (SSN), as amended.

PURPOSE: To obtain information from an individual for records pertaining to eligibility, claims

processing, quality of care review, customer service enhancement, and payment related to the TRICARE Retiree Dental Program.

ROUTINE USES: Information collected may be used and disclosed generally as permitted under 45 CFR Parts 160 and 164, Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules, as implemented by DoD 6025.18-R, the DoD Health Information Privacy Regulation. In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, the DoD "Blanket Routine Uses" under 5 U.S.C. 552a (b) (3) apply to this collection. Information from this system may be shared with federal, state, local, or foreign government agencies, and with private business entities, including individual providers of care, on matters relating to eligibility, claims pricing and payment, fraud, program abuse, utilization review, quality assurance, peer review, program integrity, third-party liability, coordination of benefits, and civil and criminal litigation.

DISCLOSURE: Voluntary. If you choose not to provide your information, no penalty may be imposed, but absence of the requested information may result in the denial of benefits.

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.