PRIVACY IMPACT ASSESSMENT (PIA)

For the

<table>
<thead>
<tr>
<th>The Health Affairs (HA)/TRICARE Management Activity (TMA) Communications ListServ (GovDelivery)</th>
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<td>Office of the Assistant Secretary of Defense Health Affairs (OASD(HA))</td>
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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
- [x] Existing Electronic Collection
- [ ] New 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
- [x] No

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

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
- [x] 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
- [x] 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. Chapter 55, Medical and Dental Care; and 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS).
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.

Implemented in 2009, GovDelivery was used to invite TMA Beneficiaries, whose e-mail addresses were derived from the Defense Enrollment Eligibility Reporting System (DEERS) database, to opt-in to the HA/TMA Communications ListServ on a yearly basis. The ListServ is used to provide periodic medical alert notifications to those individuals that have chosen to opt-in. The HA/TMA Communications ListServ is powered by the GovDelivery Digital Subscription Management System. The ListServ is operated on a Software-as-a-Service (SaaS) basis by GovDelivery, Inc. GovDelivery is integrated on various agency web pages to allow public users to subscribe to agency public content. The HA/TMA Communications ListServ will significantly broaden MHS outreach, whereas we currently only access a fraction of stakeholders that need this pertinent and timely information. Currently, users can subscribe to receive updates from www.health.mil web site via an opt-in subscription page by providing their e-mail address and creating their own unique user name.

The system owner is the Department of Defense, Office of the Assistant Secretary of Defense/Health Affairs, The Pentagon, Washington DC 20301-1200.

The HA/TMA Communications ListServ, powered by the GovDelivery Digital Subscription Management System, will be used to send e-mails to:

- Inform beneficiaries, and members of the general public, of new policies or changes in policies that relate to their MHS health care benefits.
- Inform beneficiaries, and members of the general public, of changes in their health care benefits.
- Inform beneficiaries, and members of the general public, about any recalls or warnings on drugs or medical devices.
- Inform beneficiaries, and members of the general public, about new medical care programs.
- Inform beneficiaries, and members of the general public, of medical research products that provide or promote health.
- Inform beneficiaries, and members of the general public, about new medical education and training opportunities that may enhance their medical knowledge.
- Inform beneficiaries, and members of the general public, about and provide them guidance for action with regard to any epidemic or pandemic events or any national disaster event.
- Inform beneficiaries, and members of the general public, and explain to them, any relevant medical alerts.
- Respond to any significant health-related questions that may be directed toward DoD by the media which may result in generalized concern in the beneficiary population.

The only personally identifiable information (PII) collected by GovDelivery is e-mail address. Individuals can subscribe to receive updates at the following web address: https://public.govdelivery.com/accounts/USMHSTMA/subscriber/new.

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

There is a very low potential for privacy risks. The PII collected consists of the individual's e-mail address only. Individuals shall be given multiple ways to opt-out of receiving communications from the HA/TMA Communications ListServ. When an individual opts-out of the system, that individual's e-mail address shall be permanently deleted.
from the GovDelivery system. Additionally, individuals shall be provided with clickable links and telephone contact information to facilitate the opt-out process.

Furthermore, GovDelivery has implemented security policies and procedures in accordance with National Institute of Standards and Technology (NIST) guidelines.

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.

- [ ] Other DoD Components.
  Specify.

- [ ] Other Federal Agencies.
  Specify.

- [ ] 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?

- [X] Yes
- [ ] No

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

Subscription information and preferences are supplied by the individual voluntarily at http://www.health.mil. Individuals shall be provided with instructions to opt-out of the ListServ at any time through multiple methods. Currently, any user that comes to the web site can opt-in to receive updates by providing an e-mail address and user name. At any time, that user can unsubscribe from GovDelivery and their record will be permanently deleted.

(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.

After providing their e-mail address, the individual is given the option to select an e-mail delivery frequency preference and, optionally, to create a password for managing subscriptions and topic preferences. Currently, the only additional option is to opt-in to receive e-mails from MHS Force Health Protection & Readiness. The individual is also given the opportunity to opt-in to receive e-mail news from other federal agencies. At any time, that user can unsubscribe from GovDelivery and their record will be permanently deleted.

(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. Individuals may read the privacy policy, in electronic format, on the MHS webpage to discover the forms of PII used and how it is stored and accessed. Individuals may also read the privacy policy, in electronic format, on each of the GovDelivery web pages to discover the forms of PII used and how it is stored and accessed. Each page of the GovDelivery website has a link to the Privacy Policy.
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.