PRIVACY IMPACT ASSESSMENT (PIA)

For the

International SOS (Intl.SOS) Customer Feedback System (CFS)
Managed Care Support Contractor (MCSC) / TRICARE Management Activity (TMA)

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

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.

10 U.S.C. Chapter 55, Medical and Dental Care; 38 U.S.C. Chapter 17, Hospital, Nursing Home, Domiciliary, and Medical 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.

The Customer Feedback System (CFS) is used to manage quality incidents that occur for the TRICARE Overseas Program (TOP). When a compliment, complaint, Potential Quality Incident (QPI), or Quality Incident (QI) is identified, information is captured in the quality management system to track and manage the incident. CFS will cross-reference the International SOS (Intl. SOS) TriCase Case Management and Authorization System and add an indicator in CFS to the case in which the complaint occurred. If a PQI or QI is identified, information regarding the medical provider and possibly the medical case is logged in order to determine how to manage mitigating a solution. Because TriCase has already collected all relevant case management and patient information, CFS has no need to collect this personally identifiable information (PII) / protected health information (PHI) again.

CFS captures only the minimum amount of PII / PHI necessary to manage a quality incident:

- Patient Name;
- Birth Date
- Spouse Information
- Marital Status
- Child Information

- Contact information for the who initiated the complaint (personal cell or home telephone number, personal e-mail address, emergency contact information, including a provider or beneficiary);

- Correspondences as attachments (e-mails regarding the compliant from the contact could contain PII if the contact includes it. Intl.SOS staff do not include this information in e-mails); and

- Feedback Summary Free Text Field. PHI is only captured in the free text field if it is required as part of the management of a PQI or QI. Detailed information is not captured as the details are captured in TriCase. A cross reference code is provided in CFS that links the information to TriCase.

Any service member or family member who has care managed by Intl.SOS has a potential to have information logged into this system, including the following:

- Active Duty Service members
- National Guard members
- Reserve members
- Retired Service, National Guard, and Reserve members
- Families of Active Duty Service, National Guard, and Reserve members
- Anyone covered by any TRICARE health plan

The Corporate Medical Services & Operations division within Intl.SOS owns this system.

CFS is currently in the operational phase of the system development life cycle.

CFS POC:

International SOS
3600 Horizon Blvd
Trevose, PA 19053
(215) 942 - 8000

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

There are limited privacy risks associated with the PII / PHI collected because no patient names are held in the system (except sometimes in attached documentation). Access to this PII / PHI is based on approved rights and permissions. Staff who access this system have ADP-II clearances if they are located in Philadelphia or from our Subcontractors. Intl.SOS overseas offices must receive a local clearance. Local clearances for these offices have been reviewed and approved by both TMA and the DIACAP.

Intl.SOS audits all alarm centers to meet the comply with Health Insurance Portability and Accountability Act of 1996 (HIPAA) as the global standard for operations and protecting privacy. All personnel are required to attend annual HIPAA and privacy trainings.

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. Only Intl.SOS staff and their contractors (Wisconsin Physician Services (WPS) and MEDPROTECT will have access to this system. WPS and MEDPROTECT's access is limited to supporting actions for mitigation and resolution of quality events.

All contracts contain language which requires the contractor to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule and the HIPAA Security Rule. In addition to the responsibilities to comply with the HIPAA Privacy and the HIPAA Security Rule, the contractor is required to comply with the Privacy Act of 1974, as amended.

☐ **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 by telephone interview, e-mail, or fax is voluntary. However, if an individual refuses to provide information, the compliment, complaint, QPI, or QI may not addressable.

(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.

Individuals are given the opportunity to consent to the specific uses of their PII at the initial point of collection when they are provided with a Privacy Act System of Record Notice (SORN). The SORN details the purpose of the system.

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.	This statement serves to inform you of the purpose for collecting personal information required to provide feedback to International SOS and how it will be used. AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 38 U.S.C. Chapter 17, Hospital, Nursing Home, Domiciliary, and Medical Care; 32 CFR Part 199, Civilian Health and Medical

Program of the Uniformed Services (CHAMPUS); and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from individuals when necessary to manage, track, and investigate potential quality incidents or grievances that occur within the TRICARE Overseas 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, as amended, the DoD "Blanket Routine Uses" under 5 U.S.C. 552a (b) (3) apply to this collection. Information may also be disclosed as a routine use under 5 U.S.C. 552a(b)(3) to other Federal, State, local, and foreign government agencies, private business entities under contract with the Department of Defense, individual providers of care, and other third parties, on matters relating to eligibility, claims pricing and payment, fraud, program abuse, utilization review, quality assurance and appraisal, peer review, program integrity, third-party liability, coordination of benefits, and civil or 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 administrative delays or may result in the inability to process your feedback.

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.