PRIVACY IMPACT ASSESSMENT (PIA)

For the

Referral Information Tracking Application (RITA)

TRICARE Area Office-Eurasia Africa (TAO-EA)/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
- [ ] Yes, SIPRNET
- [x] No

Enter DITPR System Identification Number
Enter SIPRNET Identification Number

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

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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.

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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.

- [x] Yes
- [ ] No

If “Yes,” enter Privacy Act SORN Identifier

DHA07

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.

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.

Referral Information Tracking Application (RITA) provides a comprehensive, mandatory tracking and analysis application that will facilitate 100% visibility and control of all referrals for Active Duty and their family members, retirees and their family members, and activated Reservists/National Guard throughout the referral life cycle. RITA receives, organizes, stores, and presents data to its customers (i.e., Military Treatment Facilities (MTFs) and various US Army Headquarters) for input of new activity, analysis, troubleshooting, reporting, and documentation. The application is owned and operated by TRICARE Area Office- Eurasia Africa (TAO-EA) for its stakeholders and is operated on the Landstuhl Regional Medical Center (LRMC) Army Network. The Military Health System (MHS) does not operate RITA. However, TAO-EA Information Management and Information Technology (IM/IT) provides all levels of support. The system was developed for and managed by TRICARE Area Office Eurasia-Africa (TAO-EA). The system will be accessed by TRICARE staff at the MTFs across Europe.

TAO-EA currently receives medical referral information once a day at night from each of the nine Composite Health Care Systems (CHCS) servers in the theater of operations. TAO-EA purpose is to clean, filter, organize, and supply data to RITA. Personally identifiable information (PII) and protected health information (PHI) collected is: name, date of birth, social security number, referral reason, provider specialty, and referral notes.

System Information:
Referral Information Tracking Application (RITA)
TRICARE Area Office-Eurasia Africa (TAO-EA), CIO
TRICARE Eurasia Africa
Bldg 214, 4th Floor, 67681
Heuberg, Sembach Flugplatz
DSN: 314 496-6312
Comm: 011 +49 (0) 6302 67 6312

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

Access to RITA is strictly controlled by a Common Access Card (CAC), which precisely defines the rights to access being granted by senior US Army medical staff in Europe and reviewed by TAO-EA Systems staff. RITA activity is logged daily to monitor operations of access at all times. RITA is among a suite of applications created and maintained by TAO-EA and is professionally secured and protected on the LRMC network.

Identified risk involves misuse of PII/PHI by authorized system users. Since RITA is operational in nature, and has line item level control, it is necessary to use PII/PHI to identify/verify the patient who has a referral. TAO-EA ensures that only authorized and authenticated users have access to the system by encrypted data transmission, requires CAC user authentication, and ensures the display of information is minimum as necessary at all given times. Users are stratified into permission groups so that they can only see referrals from their individual or group of MTFs in which they work. Users will not have access to referrals for patients outside of their area of responsibility.

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. Military Treatment Facilities (MTFs) clinical, and administrative personnel who process medical care referrals. US Army Headquarters units above these MTFs, to include European Regional Medical Command (ERMC). All personnel and organizations who will have access to RITA are medical
professionals with a CAC and rights to use a Department of Defense (DoD) medical information network. RITA receives data from CHCS (it is read only).

☐ Other DoD Components.
Specify. CHCS

☐ Other Federal Agencies.
Specify.

☐ State and Local Agencies.
Specify.

☐ Contractor (Enter name and describe the language in the contract that safeguards PII.)
Specify. There are two primary sets of contractors that may access the application and PII/PHI: (1) TRICARE Eurasia Africa Information Management and Information Technology Team (TAO-EA IM/IT) and (2) various ERMC (European Region Medical Command) Medical Treatment Facility personnel. Both sets of contractors hold Department of Defense (DoD) Public Key Infrastructure (PKI) Common Access Cards (CAC) and are required to complete Health Insurance Portability and Accountability Act (HIPAA) training, privacy training, and computer security training in accordance with Army policy.

All contracts contain language which requires the contractor to comply with the HIPAA Privacy Rule, and the HIPAA Security Rule. In addition to the responsibilities to comply with the HIPAA Privacy Rule and the HIPAA Security Rule, the contractor is required to comply with the Privacy Act of 1974.

☐ 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.

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

Individuals are not asked to provide PII/PHI. All PII/PHI is taken directly from CHCS.
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 are not asked to provide consent since PII/PHI is taken directly from CHCS.

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.

No individuals are asked to provide PII/PHI because all PII/PHI is taken directly from CHCS.