PRIVACY IMPACT ASSESSMENT (PIA)

For the

ScImage PICOM Enterprise v3.x Build 7
Air Force Medical Service (AFMS)

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 12007
- 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
  If “Yes,” enter UPI
- No

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 F044 F 5GE

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, Sections 1071-1097b, Medical and Dental Care; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; DoD 6025.18-R, DoD Health Information Privacy Regulation; DoD 6010.8-R, CHAMPUS; DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities: Foreign Service Care; Third-Party Collection; Beneficiary Counseling and Assistance Coordinators (BCACs); Pub.L. 104-91, Health Insurance Portability and Accountability Act of 1996; 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 United States Air Force School of Aerospace Medicine, AeroMedical Consultation Service (ACS) is charged with receiving, evaluating, maintaining and archiving a database of all cardiology studies on all USAF rated aviators as described in AFI 48-123 Volume 3, Chapter 7 and in the AFPAM 48-133. The ECG Library provides timely AeroMedical disposition for all resulting disqualifying abnormalities and responds to requests by Air Force Medical Operation Agency (AFMOA) and the major commands for review of cardiac studies and AeroMedical disposition in rated-aviator aircrew. ScImage PICOM Enterprise v 3.x Build 7 electronically provides central image management, archiving, retrieving, and reporting capabilities for all cardiology studies evaluated by the ACS.

Certain relevant Personal medical Information is collected and maintained to identify, diagnose and treat rated-aviator aircrew.

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

ScImage PICOM Enterprise may contain medical information of a sensitive nature which if released would violate the privacy of persons evaluated by the ACS. Safety and security precautions are enforced to ensure PII is not exposed to unauthorized individuals. Access to the ScImage PICOM Enterprise is secured through controlled access to the building and limited access to diagnostic areas. Each workstation with access to ScImage PICOM Enterprise is secured with CAC enabled security. Further, access to individual records within the ScImage PICOM Enterprise is controlled through role-based IT security. Users are assigned to Groups with restricted access. Reading physicians and administrators have access to all patient information. Referring physicians, technicians and medical personnel have limited access based upon requirements to perform a specific diagnostic exam.

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. United States Air Force School of Aerospace Medicine, AeroMedical Consultation Service (ACS)

☐ 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. ScImage, Inc. HIPAA Business Associate agreement

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

Under the Privacy Act the individual has the opportunity to object to the collection of their PII. MTF Admission processes contain patient admission forms that include detailed PII/PHI discussion. By agreeing to an appointment or treatment/procedure, the individual is providing implied consent. Under the HIPAA Privacy Rule certain information is required in the course of treating the patient, in order to identify the patient and document treatment. The HIPAA privacy rules do not require that a patient have an opportunity to object to or consent to the use of their information for treatment, payment, or health care operations. Treatment is not subject to the minimum necessary rules. Conversely, the HIPAA Notice of Privacy Practices, which is available to all patients and posted in the MTF, describes the uses and disclosures of protected health information and how, where applicable, a patient can request a restriction to a use or disclosure. However, the covered entity is not required to agree to the restriction, except in limited circumstances.

(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.

Under the Privacy Act the individual has the opportunity to consent to the collection of their PII. MTF Admission processes contain patient admission forms that include detailed PII/PHI discussion. By agreeing to an appointment or treatment/procedure, the individual is providing implied consent. Under the HIPAA Privacy Rule certain information is required in the course of treating the patient, in order to identify the patient and document treatment. The HIPAA privacy rules do not require that a patient have an opportunity to object to or consent to the use of their information for treatment, payment, or health care operations. Treatment is not subject to the minimum necessary rules. Conversely, the HIPAA Notice of Privacy Practices, which is available to all patients and posted in the MTF, describes the uses and disclosures of protected health information and how, where applicable, a patient can request a restriction to a use or disclosure. However, the covered entity is not required to agree to the restriction, except in limited circumstances.

(2) If "No," state the reason why individuals cannot give or withhold their consent.
available to all patients and posted in the MTF, describes the uses and disclosures of protected health
information and how, where applicable, a patient can request a restriction to a use or disclosure. However,
the covered entity is not required to agree to the restriction, except in limited circumstances.

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.

A Privacy Act Statement is provided in written format and the patient is instructed that their PII is
collected and maintained to identify, diagnose and treat rated-aviator aircrew. Healthcare treatment
data and records can be obtained as prescribed by both HIPAA and the Privacy Advisory.

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.