



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Pharmacy Refill Request and Appointment Reminder Solution (RxRefill)

Defense Health Agency/Pharmaceutical Operations Directorate

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
- 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

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; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities: Foreign Service Care; Third-Party Collection; Beneficiary Counseling and Assistance Coordinators (BCACs); 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 RxRefill solution is a leased commercial service that provides prescription refill capabilities which can be supported via telephone and Internet (local Military Treatment Facility (MTF) websites or via TRICARE Online). RxRefill supports automated reminder notifications for clinic appointments, patient referrals, and prescriptions ready for pick-up. It also has the capability to notify patients of medication recalls, to conduct patient satisfaction data calls and to do population health questionnaires and notifications. The RxRefill solution also has the ability to process refill prescription requests when the Composite Health Care System (CHCS) is unavailable and supports Mail Order Pharmacy capabilities.

The RxRefill solutions consists of the following components:

The Pharmacy Suite - The pharmacy suite automates the patient's prescription refill process. Patients can request a refill or the status of a particular prescription through a single phone call or Internet session. Educational materials for specific prescriptions can be provided by the system. The RxRefill interface to the host pharmacy system (CHCS Pharmacy Module) limits patient access to only their specific prescription information.

The Appointment Suite - The appointment suite software can call patients to remind them of upcoming scheduled appointments, allow patients to call into the system or login to the Internet to retrieve appointment information, allow patients to verify phone number information and allow the facilities to contact patients in case of clinic cancellations. Multiple appointments for an individual and / or multiple patient appointments with a single household can be set up to be made in a single call. Unique department instructions or messages can be customized and incorporated with the appointment reminders to remind patients of such things as: to arrive 30 minutes prior to their appointment, or bring their insurance cards and referral forms. The solution will allow a patient to confirm, cancel or request a rescheduling of their appointment.

Clinical Information - This suite sets up a secured voice "mailbox" for each patient where the provider can leave the patient a personalized result or message. Providers can record standard results and messages that can be placed in patient "mailboxes" by a nurse or aide, or messages and results can be custom recorded for specific encounters. Patients can retrieve their messages by calling the system and identifying themselves with their pre-assigned pin number. This suite can be set up to call patients to alert them that they have a message or result in the system. Reports are available identifying messages and results that have not been accessed by the patient.

Communications - The communication suite utilizes custom announcements, referral reminders, health and wellness reminders and data calls, flu vaccination reminders, or drug recalls, patients can be kept informed, reducing anxiety, to improve the overall patient experience.

RxRefill contains personal descriptors, demographic data, identification numbers, and medical information. The individuals whose information is collected in this system include active duty military (all services + Coast Guard and Reserve), veterans, dependents, retirees and/or their dependents, active-duty, contractors, foreign nationals, former spouses, reservist, national guard personnel, and prisoners of war.

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

The RxRefill solution is located with the MTFs domain and within the MTFs secured computer room. The interfaces are transmitted using authorized encryption protocols. PII/PHI that is stored on RxRefill is initially collected and entered on the host CHCS computer system. The point of entry is not RxRefill. The RxRefill solution receives the information through direct interfaces from the host system. The data cannot be updated by direct user access from RxRefill. The information is updated through weekly updates via integration with CHCS. The PII/PHI stored on RxRefill is located within the program code and is not accessible for ad hoc reporting, queries, or removal to mobile devices. The only way this information can be accessed and used is

through program code on the Cache Portal. The Cache System Portal is protected by a username and password. A person trying to access the data would have to know the security codes and the programming language to reach the PII/PHI data. PII/PHI data includes patient demographic and pharmacy refill profiles used to confirm patient identification and refill availability when the CHCS host is not available. All applicable security and privacy processes and regulations (e.g. DoD Information Assurance Certification & Accreditation (DIACAP), Health Insurance Portability and Accountability Act (HIPAA), etc.) have been defined and implemented to reduce privacy related risks to the maximum extent possible.

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?

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.

The PII/PHI within RxRefill is initially collected and entered on the host CHCS computer system. The point of entry is not RxRefill. The RxRefill solution receives data through interface from the host system.

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.

The patient has the opportunity to consent to the specific use of their PII by calling in and specifying the type of interaction/calls they wish to receive. The RxRefill solution can block outbound calls by patient ID or phone number. These controls are maintained by the RxRefill System Administrator. For inbound calls the patient can elect not to participate in the specific programs.

(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.	<p>Patients are not asked to provide data directly to or for the RxRefill solution. Data is captured by the host system as part of the patient registration or pharmacy prescription process. The information is then passed to RxRefill for the appropriate communication. RxRefill uses the information to verify the patients name and prescription information and to create call lists for appointment and referral reminder calls.</p> <p>RxRefill is a system of records that collects personally identifiable information (PII) on individuals. However, it receives this information only through system-to-system transfers with CHCS. Because RxRefill does not collect PII directly from individuals, a Privacy Act Statement is not required.</p>
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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.