



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Veterinary Services Systems Management (VSSM)

Defense Health Agency (DHA)

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.136, Under Secretary of Defense for Personnel and Readiness; and DoD Directive 6400.04E, DoD Veterinary Public and Animal Health Service.

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 purpose of the VSSM system via the Remote Online Veterinary Record (ROVR) application is to record and maintain complete health care information, to include treatment history and deployment status, of all Government Owned Animals (GOA). It also collects the same information for Privately Owned Animals (POA) of active duty and retired military service members seen at DoD Veterinary Treatment Facilities (VTFs). POA data combined with the GOA data, will produce a single mechanism to alert leaders and decision makers of potential threats to the health status of the force due to zoonotic disease, and provide sufficient information that will direct further investigation, if needed. VSSM is deployed to all VTFs. VSSM achieved Full Operations Capability on 4 May 2014. Modules include patient scheduling, vitals, health care notes, treatment plans, invoicing, inventory, reports, data mining and medical analysis, kennel management, patient monitoring, lab results, reminder cards and follow-up tasks, and dashboard.

VSSM will collect contact information on pet owners (name, address, phone numbers, and e-mail addresses).

VSSM is managed by the Defense Health Agency, Solutions Delivery Division.

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

Potential privacy risks include:

1) Unauthorized users accessing the patient owner data without having a need to know. Mitigation strategy: Access will be carefully administered and the data protected to preclude this from happening. VSSM has role-based access, whereby users must be authenticated and granted access to only the records they are authorized to see.

2) Inaccurate information captured. Mitigation Strategy: As pet owner information is accessed by front desk personnel when conducting transactions, there are opportunities for the front desk person to verify the accuracy of the information with the pet owner.

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.

Authorized users can access PII only on the pet owners for animals being seen in their Veterinary Treatment Facility.

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.

Some personnel who have access to the system are employed on a contractual basis. There are clauses in their contracts requiring compliance with the Privacy Act of 1974 requirements to protect and safeguard the privacy and security of personal information in this system.

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

Specify.

Commercial laboratories for test results. The pet owner's name is on the laboratory request form.

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.

Pet owners can object to the collection of their PII during the patient registration, scheduling and/or check in processes. The pet owners will sign a document containing the Privacy Act Statement verbiage found on DD Form 2343 which is then scanned into the application.

(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.

Pet owners can give or withhold their consent to the specific uses of their PII during the patient registration, scheduling and/or check-in processes. The pet owners will sign a document containing the Privacy Act Statement verbiage found on DD Form 2343 which is then scanned into the application.

(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.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

VSSM collects PII directly from an individual whose animal is seen at a VTF into a system of records. Therefore, any individual asked to provide PII should receive a Privacy Act Statement (PAS). A recommended PAS for use when collecting PII into VSSM is attached.

AUTHORITY: 10 U.S.C.136, Under Secretary of Defense for Personnel and Readiness; and DoD Directive 6400.04E, DoD Veterinary Public and Animal Health Service.

PURPOSE: To collect your information in order to register, track, and treat your animal at a Veterinary Treatment Facility (VTF).

ROUTINE USES: Use and disclosure of your records outside of DoD may occur in accordance with 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. This may include disclosures to federal, state, and local agencies for reporting of medical conditions required by law and for preventative health and zoonotic disease control programs; to accredit veterinary corps. personnel; to federal, state, local, or foreign agencies to investigate or pursue potential breaches of law or regulation and to protect national security; and to other non-DoD entities when disclosure is reasonably necessary to prevent or mitigate a data breach.

SYSTEM OF RECORDS NOTICE: The appropriate system of records notice for VSSM is A0040-905 DASG, Defense Privately Owned Animal Records (May 19, 2016, 81 FR 31613), published at <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/569976/a0040-905-dasg/>.

DISCLOSURE: Voluntary: however, your failure to provide the requested information may prevent your animal from receiving care at a VTF.

Oral PAS

I am about to request information from you regarding your animal's care at this Veterinary Treatment Facility. If you choose not to provide this information, no penalty may be imposed on you, but we may not be able to provide services to your animal.

The authorities permitting this collection include 10 U.S.C. Section 136 and DoD Directive 6400.04E. This information may be disclosed to support the reason for this call today, and other reasons as permitted by applicable privacy laws. Would you like to know more about the purposes, authorities, or disclosures, or receive a paper copy of the full Privacy Act Statement?

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.