

## PRIVACY IMPACT ASSESSMENT (PIA)

**PRESCRIBING AUTHORITY:** DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

**1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:**

Armed Forces Billing And Collection Utilization Solution - Amazon Web Services (ABACUS-AWS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |  |  |
|--|--|
| <input type="checkbox"/> From members of the general public  | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4)   |

**b. The PII is in a:** (Check one)

- |  |   |
|--|---|
| <input type="checkbox"/> New DoD Information System                    | <input type="checkbox"/> New Electronic Collection      |
| <input checked="" type="checkbox"/> Existing DoD Information System    | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> Significantly Modified DoD Information System |   |

**c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.**

The Armed Forces Billing and Collection Utilization Solution (ABACUS) provides a standard patient accounting system for health care billing practices. It assists Department of Defense (DoD) military treatment facilities (MTFs) in the collection, tracking, and reporting of data required for the DoD Third Party Collection Program billing process by the adoption of standard commercial medical billing practices to MTFs. ABACUS replaced the Third Party Outpatient Collection System (TPOCS), as well as the Medical Services Account (MSA) and Third Party Inpatient billing modules housed in the Composite Health Care System (CHCS). This solution included the migration of current and historical data from both TPOCS and CHCS; help desk support for end users, end user training, maintenance, clearing house services and an electronic "Other Health Insurance" discovery. ABACUS is now the single source of financial information for the accounting of Services Uniform Business Office (UBO) receivables.

Utilizing data from CHCS and MHS Genesis, ABACUS develops claims and invoices to aid the UBOs in the recovery of revenue for services rendered at MTFs from third party payers and other federal agencies. In addition, the U.S. Treasury uses information maintained in ABACUS to collect from person(s) or organization(s) with outstanding delinquent debts on behalf of MTFs.

The types of personal information collected consists of patient demographic data, SSNs, employment information, and encounter information such as clinical, ambulatory, inpatient, laboratory, radiology, and pharmacy visits.

Personal information is collected for active duty DoD, their dependents and former spouses, non-active duty DoD, non-DoD beneficiaries (such as member of the legislative and executive branches), Reservists, National Guard, Public Health Services, as well as civilian or Federal agency personnel treated at DoD MTFs.

ABACUS is owned by Defense Health Agency (DHA) and is managed by the Solutions Development Division (SDD) Program Executive Office (PEO).

**d. Why is the PII collected and/or what is the intended use of the PII?** (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

The PII collected is used for administrative and mission-related purposes primarily to identify beneficiaries and authenticate eligibility in support of the Third Party Collection (TPC), Medical Services Account (MSA), and the Medical Affirmative Claims (MAC) Programs.

**e. Do individuals have the opportunity to object to the collection of their PII?**  Yes  No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

ABACUS is not the initial point of collection for PII. PII is obtained from existing systems, and therefore the opportunity to object is only

available at the source systems.

f. 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.

ABACUS is not the initial point of collection for PII. PII is obtained from existing systems, and therefore the opportunity to object is only available at the source systems.

The PII maintained in ABACUS is used for the express purpose of interfacing with other DoD and federal agencies, commercial health insurers, electronic clearinghouses, and any other parties against whom recovery has been sought by DoD Military Health System (MHS). Also to include all parties involved in support of the collection activities, reimbursement, and payment for health care approved by DoD.

g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided. (Check as appropriate and provide the actual wording.)

Privacy Act Statement  Privacy Advisory  Not Applicable

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)

Within the DoD Component

Specify.

ABACUS does not exchange data with any other DoD Component systems or applications. However, all Services (Army Medical Command (MEDCOM), Navy Bureau of Medicine (BUMED), Air Force Medical Operations Agency (AFMOA) and the National Capital Region Medical Directorate (NCR MD)) UBOs have access to ABACUS and are able to view data within their respective Component sites. Although restricted to specific user roles, the ability for users to view data within and across sites allows leadership oversight at regional and headquarters levels.

Other DoD Components

Specify.

Same as above

Other Federal Agencies

Specify.

PII will be shared with the billing/claims offices within the U.S. Treasury, the Veteran's Administration, Centers for Medicare and Medicaid (CMS), and U.S. Coast Guard in order to reimburse DoD for medical services provided to their beneficiaries.

State and Local Agencies

Specify.

General Dynamics One Source (GDOS) LLC (a subsidiary of GDIT), the Cloud Services Provider (CSP) is providing ABACUS to the Government as a cloud-based Software-as-a-Service (SaaS) offering, hosted in the Amazon Web Services (AWS) GovCloud environment. AWS GovCloud is FedRAMP certified for Infrastructure-as-a-Service (IaaS) and Platform-as-a-Service (PaaS) cloud services at level 4. The CSP is responsible for all operations, support and maintenance of ABACUS.

Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

The ABACUS contract includes the appropriate for the FAR clause language to ensure compliance with the Privacy Act of 1974 (5 U.S.C. 552a), the Health Insurance Portability and Accountability Act of 1996, and the Freedom of Information Act (5 U.S.C. 552). Additionally, the contract includes the requirement for Assessment and Accreditation (A&A) as specified in DoDI 8510.01 for compliance with Risk Management Framework (RMF) Authority to Operate (ATO) at the moderate level.

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

Specify.

**i. Source of the PII collected is:** (Check all that apply and list all information systems if applicable)

- |  |   |
|--|---|
| <input type="checkbox"/> Individuals                                 | <input type="checkbox"/> Databases          |
| <input checked="" type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems           |   |

Existing DoD Information Systems: ABACUS collects data from two Defense Health Agency (DHA) information systems -- Composite Health Care System (CHCS) and MHS Genesis. Both systems provide nightly data feeds from the various DoD MTFs to ABACUS.

**j. How will the information be collected?** (Check all that apply and list all Official Form Numbers if applicable)

- |   |  |
|---|--|
| <input type="checkbox"/> E-mail   | <input type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> Face-to-Face Contact                                     | <input type="checkbox"/> Paper   |
| <input type="checkbox"/> Fax  | <input type="checkbox"/> Telephone Interview                                   |
| <input checked="" type="checkbox"/> Information Sharing - System to System        | <input type="checkbox"/> Website/E-Form  |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) |  |

CHCS and MHS Genesis collect and maintain the PII for patients who are treated at the MTFs. System interfaces between ABACUS and these systems are designed so that PII and other data required for billing are transmitted electronically to ABACUS without the necessity for human intervention.

**k. 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 must be consistent.

Yes  No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.dod.mil/Privacy/SORNs/>  
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

**l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?**

(1) NARA Job Number or General Records Schedule Authority.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

Cutoff Instruction: Close out at end of the calendar year in which received  
Retention Period: Destroy 10 year(s) after cut off  
OSD RDS FN: 911-01

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.
- (2) If a SORN does not apply, 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) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.
  - (b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, 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 must be identified.

The authority for maintenance of the system is as follows:

10 U.S.C. 1079b, Procedures for charging fees for care provided to civilians; retention and use of fees collected; 10 U.S.C. 1095, Health care services incurred on behalf of covered beneficiaries; collection from third party payers; 42 U.S.C. Chapter 32, Third Party Liability For Hospital and Medical Care; 28 CFR Part 43, Recovery of Costs of Hospital and Medical Care and Treatment Furnished by the United States; 45 CFR Parts 160 and 164, Health and Human Services, General Administrative Requirements and Security & Privacy; 32 CFR Part 220, Collection from Third Party Payers of Reasonable Charges for Healthcare Services; DoD 6010.15-M, Chapter 3, Medical Services Account; and E.O. 9397 (SSN), as amended.

**n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (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     No     Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, " DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

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