

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:

Enterprise Clinical Audiology Application (ECAA) 2.x

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

Hearing Center of Excellence (HCE)

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 checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input 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.

ECAA, owned and managed by the Department of Defense (DoD) Hearing Center of Excellence, J-9 Research and Development Division, is comprised of an audiometric database software application and is used for retrieving electronic information from audiological instrumentation (audiometers or tympanometers), which is used by the Audiologist for diagnosing a patient's hearing and storing the patient's audiogram information to a central database (server) hosted in the MHS Application Access Gateway (MAAG) virtual enclave. This information is then used by the HCE audiology clinic, Ear Nose and Throat (E.N.T.) clinic, Otolaryngologists, or the Otologist across the Department of Defense for establishing a patient's diagnosis or treatment. Along with the data collected, the audiologist can view previous audiograms associated with the patient. ECAA empowers the Audiologist to collect, store, share, query, print, and export audiological data. Information being collected is the patient's First Name, Last Name, Patient ID/Electronic Data Interchange Personal Identifier (EDIPI), Gender, Date of Birth (DOB), Medical Information associated with the creation of the Audiogram. Information is collected from uniformed services medical beneficiaries enrolled in the Defense Enrollment Eligibility Reporting System (DEERS) who receive or have received medical care at one or more of DoD's military treatment facilities (MTFs), Uniformed Services Treatment Facilities (USTFs), or care provided under TRICARE programs.

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)

PII data is maintained for verification and identification of patient data collected in this system, application, or database. The intended use of the PII is for Administrative, Patient Care, and Clinical Support.

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.

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. Submission of information is voluntary. If an individual chooses not to provide PII/PHI information, no penalty may be imposed, but absence of the requested information may result in administrative delays. 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.

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.

Consent to the specific uses of PII is obtained as necessary, in accordance with DoD 5400.11-R, DoD Privacy Program, C4.1.3. PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, DoD Health Information Privacy Regulation. Individuals are informed of these uses and are given the opportunity to restrict the use of their PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DoD 6025.18-R, C10.1. For uses other than treatment, payment and healthcare operations, individuals can authorize the use of their PHI by submitting DD Form 2870. For uses other than treatment, payment and healthcare operations, individuals can request restrictions on the use of the PHI by submitting DD Form 2871.

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

Privacy Act Statement

This statement serves to inform you of the purpose for collecting personal information required by ECAA and how it will be used.

AUTHORITY: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 55 Medical and Dental Care; 10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries; Collection from Third Party Payers Act; 44 U.S.C. 3101, Records management by agency heads; general duties; 5 CFR 293.502, Subpart E, Employee Medical File System Records; 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; DoD 6025.18-R Health Information Privacy Regulation; and E.O. 9397 (SSN), as amended

PURPOSE: To collect information from you in order to determine your eligibility for health care, deliver and manage that care, and manage the entities providing that care.

ROUTINE USES: Information in your records may be disclosed to private physicians and Federal agencies, including the Departments of Veterans Affairs, Health and Human Services, and Homeland Security in connection with your medical care; other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and nongovernment third parties to recover the cost of healthcare provided to you by the Military Health System.

DISCLOSURE: Voluntary. If you choose not to provide your information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

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.

Interconnection Security Agreement between Defense Health Agency Deputy Assistant Director, Information Operations (DHA-J-6), and Defense Health Agency Research and Development Directorate (J-9) concerning connectivity of the Military Health System Information Platform (MIP) and the ECAA IOI 502.02, which enables data from ECAA to be used by medical providers and research analysts of MIP for the purpose of patient care and data analytics. This agreement allows ECAA data to be securely shared with the NDAA mandated Joint Hearing Loss & Auditory System Injury Registry (JHASIR) for reporting personnel hearing loss auditory/vestibular injuries to Congress.

Other DoD Components

Specify.

Army, Navy, Air Force audiology clinics across the DoD for the purpose of capturing clinical audiograms.

Other Federal Agencies

Specify.

Departments of Veterans Affairs, Health and Human Services, and Homeland Security in connection with patient medical care; to include other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and non-government third parties to recover the cost of healthcare provided to you by the Military Health System.

State and Local Agencies

Specify.

AudSoft Inc. must comply with Privacy Act Program Requirements (DoD 5400.11-R), DoD Health Information Privacy Regulation (DoD 6025.18-R), and Privacy or Security Safeguards (FAR 52.239-1) as outlined in their current contract.

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.

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)

Individuals

Databases

Existing DoD Information Systems

Commercial Systems

Other Federal Information Systems

PII data is entered into ECAA by clinicians at MTFs using information from the Composite Health Care System (CHCS). No data is electronically transferred from CHCS to ECAA, but a clinician can view both CHCS and ECAA simultaneously on the same workstation. This will allow the clinical staff to copy and paste demographic information that was previously entered into CHCS. Medical information for the audiogram will be collected by ECAA during the hearing test using audiometric instrumentation - audiometers and tympanometers.

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

E-mail

Official Form (Enter Form Number(s) in the box below)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

Patients are referred from other MTF's or the Department of Veterans Affairs (VA). PII data is entered into ECAA by clinicians at DoD MTFs using information from CHCS. No data is electronically transferred from CHCS to ECAA, but a clinician can view both CHCS and ECAA simultaneously on the same workstation. This will allow the clinical staff to copy and paste demographic information that was previously entered into CHCS. Medical information for the audiogram will be collected by ECAA during the hearing test. The provider confirms demographic information with the patient face-to-face and updates their information in ECAA as needed.

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.d.defense.gov/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.

Disposition pending. Treat system records as permanent until the National Archives and Records Administration approves the retention and disposition proposal.

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.

10 U.S.C. 55 Medical and Dental Care; 10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection from Third Party Payers Act; 44 U.S.C. 3101, Records management by agency heads; general duties; 5 CFR 293.502, Subpart E, Employee Medical File System Records; 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; DoD 6025.18-R Health Information Privacy Regulation;

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.

The PRA does not apply due to the collection's internal respondent population. Additionally, this internal collection is exempt under Paragraph 1.b.[13] of Enclosure 3 in DoD Manual 8910.01.