

## 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:**

Clinical Information System (CIS) Essentris Inpatient System

**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.**

Clinical Information System (CIS)/Essentris®, the Military Health System (MHS) inpatient documentation solution, is a comprehensive clinical documentation system for use in acute care hospitals. CIS/Essentris® enables continuous and automated clinical documentation and bedside point-of-care data capture. All inpatient clinical documentation is created and stored in CIS/Essentris®, the Composite Health Care System (CHCS), and bedside instruments. Clinical data may be aggregated, trended, and analyzed to manage care for a single patient or for an entire patient population. CIS/Essentris® also provides waveform documentation, graphical trending on patient parameters, a reference library, patient education materials, and various reporting capabilities such as change of shift reports, task lists, and administrative reports.

The data contained in CIS/Essentris® is collected solely from and about MHS beneficiaries, and foreign nationals when necessary, for the purpose of providing requested health care. Personally identifiable information (PII) and protected health information (PHI) collected includes personal descriptors, ID numbers/Social Security Numbers (SSN), contact information, ethnicity, religion, health, financial, and employment information. Additional information may be collected from retirees and their dependents, active duty, contractors, foreign nationals, former spouses, Reservists, and National Guard personnel.

CIS/Essentris® is an unclassified commercial off the shelf (COTS) system supporting the delivery of inpatient, emergency department, and selected outpatient care at DoD Military Treatment Facilities (MTFs). DHA has purchased licenses and is under contract to utilize this COTS product, owned by the vendor, CliniComp International. DHA operates the system at 54 operational sites and maintenance of servers at 7 MHS Genesis/closed-inpatient facilities with support from the vendor.

The Solution Delivery Division (SDD), Health Information Technology (HIT), DHA Electronic Health Record (EHR) Core PMO manages CIS/Essentris®.

**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/PHI collected and maintained is used to identify the patient and avoid any possible medical error. Collecting an individual's name, SSN, DoD ID, and date of birth is necessary in order to verify an individual's identity and eligibility for care when visiting an MTF.

PII/PHI is used within CIS/Essentris® to support the provision of inpatient health care throughout the MHS. Patient information is collected to administer health care services. User data are collected to support administration and clinical practice authorization and access.

**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.

Submission of PII is voluntary; however, if an individual refuses to provide needed information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

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 by DoDM 6025.18 (March 13, 2019), Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs.

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 are collected and maintained, in accordance with DoDM 6025.18, C10.1. For uses other than Treatment, Payment and Healthcare Operations, individuals can authorize the use of their PHI by submitting DD Form 2870; Authorization for Disclosure of Medical or Dental Information. For uses other than Treatment, Payment and Healthcare Operations, individuals can request restrictions on the use of the PHI by submitting DD Form 2871; Request to Restrict Medical or Dental Information.

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

AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to manage and deliver care to you at a military treatment facility, and support continuity of care with other providers.

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.

Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, healthcare operations, and the containment of certain communicable diseases.

For a full listing of the applicable Routine Uses, refer to the applicable SORN.

APPLICABLE SORN: EDHA 07, Military Health Information System (November 18, 2013, 78 FR 69076) is the SORN applicable to this system. The SORN can be viewed at: <https://dpcl.dod.mil/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570672/edha-07/>

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.

DHA and MTF personnel  
PII/PHI is used within CIS/Essentris® to support the provision of inpatient health care throughout the MHS. Patient information is collected to administer health care services. User data are collected to support administration and clinical practice authorization and access.

Other DoD Components

Specify.

Army, Navy, Air Force - DHA and MTF personnel.  
PII/PHI is used within CIS/Essentris® to support the provision of inpatient health care throughout the MHS. Patient information is collected to administer health care services. User data are collected to support administration and clinical practice authorization and access.

Other Federal Agencies

Specify.

CIS/Essentris® ensures that those records are accessible to providers throughout the remainder of the care continuum. Information from inpatient records captured in CIS/Essentris® will be accessible to other providers in the care continuum through the Bidirectional Health Information Exchange (BHIE) via the Department of Defense/ Department of Veterans Affairs (DoD/VA) sharing data exchange framework and Application Virtualization Hosting Environment (AVHE). This level of interoperability will help ensure continuity of care for the War Fighter, and their families, in DoD or VA facilities.

State and Local Agencies

Specify.

Tier III support personnel at CliniComp International will have access to PII/PHI data but are not authorized to download any data without the MTF's permission. The contract contains the appropriate Business Associates Language as required.

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 Contracting company shall ensure all Contractor personnel are designated as ADP-I: SSBI/SBPR/PPR or ADP-II: ANACI /NACI /NACLC/ S-PR where their duties meet the criteria of the position sensitivity designations.

Non-U.S. Citizens - Only United States citizens shall be granted a personnel security clearance, assigned to sensitive duties, or granted access to classified information unless approved by an authority designated in Appendix 6. Exceptions to these requirements shall be permitted only for compelling national security reasons. (DoD 5200.2-R. C2.1.1, AP6.6.1) Non-U.S. citizens are not being adjudicated by any government agency for a trustworthiness determination at this time. Non-U.S. Citizens are not allowed access to any DoD systems/networks.

The Contractor shall ensure that data which contains PHI is continuously protected from unauthorized access, use, modification, or disclosure. The Contractor shall comply with all previously stated requirements for HIPAA, Personnel Security, Electronic Security, and Physical Security."

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

Existing DoD Information Systems: CHCS

**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)

PII/PHI is collected for use within CIS/Essentris® for continuity of care by 1) direct entry into the system by a health care provider/

administrator following a face to face encounter with a patient and/or 2) system interface with CHCS.

**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.

Temporary. Cut off upon last episode of patient care or last entry to the patient record is annotated. Destroy/Delete 6 years after cutoff.

**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. Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); 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.

On April 13, 2016, OMB Desk Officer for DHA collections determined that this system is not subject to any Paperwork Reduction Act

requirements.