

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:

DHA E-Commerce System (DHA ECS)

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 Defense Health Agency (DHA) is accountable for the management and operation of the TRICARE program to ensure delivery of military health and private sector care services. In support of the private sector care, DHA has implemented the DHA E-Commerce System (DHA ECS) which provides an integrated family of contract management and financial management applications supporting the private sector care "Procure-to-Pay" process, and, to a lesser extent, the "Budget-to-Report" and "Order-to-Cash" processes. DHA ECS contract management capabilities include healthcare contract solicitation, award, administration, deliverable management, performance management, and operations management. DHA ECS financial management capabilities include budget accounting, financial accounting, receivables and payables accounting, healthcare claims payment, and debt collection. A DHA ECS Program Management Office (PMO), reporting through the DHA Contract Resources Management (CRM) organization and the J-8 Resources and Management Directorate, is responsible for the maintenance, support and evolution of the DHA ECS capability.

The DHA ECS employs Commercial-Off-The-Shelf (COTS) software along with custom-built applications in a web-based environment. For example, the PRISM, Management Tracking and Reporting (MTR), Extranet, Documentum, along with Contract and Operational Reporting, support private sector care contract management processes to include requirements tracking, contract solicitation, source selection, contract development, contract award, contract execution, healthcare service acceptance and receipt, and contract close out. Likewise, the Oracle Federal Financials (OFF) application, in conjunction with the DHA ECS Data Warehouse (EDW) Financial and Pharmacy Reporting data marts, supports private sector care financial management processes such as converting healthcare claims to invoices, receivable and payable management, healthcare claims payment processing, budget management, general ledger management, debt management, and healthcare financial reporting. DHA ECS applications are secure and maintain transaction records for audit and historical reporting purposes. The applications are hosted on Defense Information Systems Agency (DISA) Capacity Services Virtual Operating Environments (VOEs) at the DISA Data Center in Oklahoma City, Oklahoma (OKC). The VOEs include a combination of Windows 2012, Linux, and Solaris based platforms in Development, Test, Quality Assurance, and Production environments. DISA is responsible for the maintenance and configuration of computer hardware, operating system software, and communications network hardware/software. DHA ECS personnel are responsible for the development, test, maintenance, and configuration of application and database software.

In support of contract management, healthcare claims payment, and debt collection, the DHA ECS receives, maintains, and disseminates Personally Identifiable Information (PII) to include: Home/Cell Phone, Mailing/Home Address, Military Records, Birth Date, Financial Information, Marital Status, Child Information, Gender/Gender Identification, Names, Other ID Number, Social Security Number (SSN) and other information such as Spouse Information, Work fax number, Family Member Prefix (FMP), and Sponsor SSN.

The PII, which resides in the DHA ECS, pertains to the following categories of individuals: Military Health System (MHS) beneficiaries, business partners/contacts, hospitals, physicians, pharmacies, and other providers.

DHA ECS interconnects with the Department of Treasury, Managed Care Support Contractors (MCSCs), the TRICARE Encounter Data System (TEDS), Procurement web sites (e.g., Electronic Document Access (EDA), System for Award Management (SAM), Federal Procurement Data System - Next Generation (FPDS-NG)), and several banks (e.g., Credit Gateway and Federal Reserve Banks). Users can access DHA ECS applications from more than one site.

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)

DHA is the DoD healthcare administrator and receives claims from healthcare entities as a basis for payment of healthcare services rendered to MHS beneficiaries. The TEDS transfers claims data, along with PII, to the DHA ECS OFF application. PII, which resides in the DHA ECS OFF application, allows DHA Office of General Counsel (OGC) to document and collect debt owed to the government by a beneficiary, hospital, or other healthcare related provider. PII is also related to the contract deliverables that allow the government to view the services the beneficiary is receiving from the contractor. This also allows the government to determine if the contractor is fulfilling its contractual obligation. This data may be included in a small percentage of the MCSC deliverables, uploaded to the DHA ECS Extranet application, encrypted, and transferred to the Documentum application for document management.

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.

PII is not collected directly from the individual. PII is collected from other DHA and MCSC systems for the purposes of processing claims and collecting debt.

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.

PII is not collected directly from the individual. PII is collected from other DHA or MCSC systems for the purposes of processing claims and collecting debt. Therefore, no consent for these uses is required under DoD 5400.11-R, DoD Privacy Program.

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

The PII in the DHA ECS is sourced from other DHA and Managed Care Support Contractor systems. As a result, no Privacy Act Statement is required.

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

<input checked="" type="checkbox"/> Within the DoD Component	Specify.	TRICARE Encounter Data System (TEDS) - Healthcare claims are processed by the TEDS. The TEDS disseminates PII to the DHA ECS for claims management. When these records are transferred to the DHA ECS they are converted to financial records and the files, to include the PII, are archived for troubleshooting claims.
<input type="checkbox"/> Other DoD Components	Specify.	
<input checked="" type="checkbox"/> Other Federal Agencies	Specify.	Department of Treasury - Debt collection actions are initiated by MCSC contractors following contract requirements. For uncollected debts that meet several criteria, the contractors will forward cases to the DHA OGC Claims Collection Section. The Claims Collection Section validates the debts and refers eligible debts to Treasury for further collection action using an OFF application generated statement that notifies the debtor of the referral.
<input type="checkbox"/> State and Local Agencies	Specify.	

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.

Managed Care Support Contractors (MCSC) - PII shared to allow DHA to manage deliverables to ensure that contractors are abiding by the contract requirements.

All MCSC contracts contain language which requires the contractor to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule and the HIPAA Security Rule. In addition to the responsibilities to comply with the HIPAA Privacy Rule and the HIPAA Security Rule, the contractor is required to comply with the Privacy Rule of 1974, as amended (Privacy Act).

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

Specify.

PNC, Bank of America, and Bank One known as JP Morgan Chase. DHA personnel also access bank web sites and download reconciliation information via secure file transfer protocol in order to conduct bank reconciliations and audit contractor spending.

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

DHA ECS applications, to include the Extranet, Documentum, PRISM, and OFF, may receive PII from the DHA TEDS or from MCSC sources. DHA OGC, and other DHA personnel, may also enter/update the DHA ECS information received from the DHA TEDS or from MCSC sources.

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)

The overall system receives PII in various ways such as:

1. Extranet users upload data via the application Uniform Resource Locator (URL) (<https://dha-extranet.csd.disa.mil>). The users (MCSCs) require this upload capability to provide the government (DHA) with tangible evidence of the services they provide. In addition, this function allows the government the ability to assess if MCSCs are fulfilling their contractual obligations.
2. Data entry is another method for updating PII into the DHA ECS applications. DHA OGC Government employees enter data into OFF related to debt collection (URL: <https://dha-finprod.csd.disa.mil>). The DHA OGC information is gained through DHA OGC telephone interview contacts or from other records which support monitoring, documenting, and determining debts owed to the government by beneficiaries, hospitals, etc.
3. Electronic claims records are received by OFF (URL: <https://dha-finprod.csd.disa.mil>) from the TEDS (DHA healthcare contractors provide these claims to TEDS electronically).

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

EDTMA 04

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.

I. 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.

GRS 1.1 Item 010

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

(3) Retention Instructions.

DHA ECS contract and financial management records are governed by NARA Office of Secretary of Defense Final Contract Notification (OSD FCN) 206-09.1, and requires destruction 6 years after final payment or cancellation, but longer retention is authorized if required for business use, e.g., when subject to one or more Litigation Holds.

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; 38 U.S.C. Chapter 17, Hospital, Nursing Home, Domiciliary, and Medical Care; 32 CFR 199.17, TRICARE Program; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 45 CFR Parts 160 and 164, Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules; 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.

DHA ECS does not collect PII information or solicit responses directly from members of the public. The DHA ECS obtains PII from other DHA or MCSC systems for the purposes of processing healthcare claims and collecting debt. Therefore, this DoD information system is not subject to OMB review.