

## 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 Blood Management System (EBMS) - Transfusion

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

05/20/22

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

**a. The PII is:** (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

From members of the general public

From Federal employees

from both members of the general public and Federal employees

Not Collected (if checked proceed to Section 4)

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

New DoD Information System

New Electronic Collection

Existing DoD Information System

Existing Electronic Collection

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 purpose of Enterprise Blood Management System (EBMS)-Transfusion, formerly known as Blood Management Blood Bank Transfusion Service (BMBB/TS), is managing the blood transfusion aspect of the Armed Services Blood Program (ASBP), including blood records, blood orders, and transfusion patient information in the Continental United States and Outside Continental United States. EBMS-Transfusion manages the Military Treatment Facility (MTF) inpatient and outpatient blood test results for transfusion compatibility and provides the following high-level functionality: automate operations while giving MTF staff the control needed to manage specimens, orders, blood products, derivatives, and routine and electronic cross-matching; manage supply to meet demand with an easy-to-use inventory overview screen with real-time updates; track patient history and raise the bar on patient safety with over 60 built-in checks and real-time patient monitoring to pro-actively alert staff of potential errors.

EBMS-Transfusion is a Commercial off the Shelf product (COTS) manufactured by WellSky® and is FDA Class II regulated. EBMS-Transfusion replaced the Defense Blood Standard System.

The types of personal information about individuals that will be transcribed/maintained in the EBMS-Transfusion system include contact information, birth date, names, child information, demographic information, other ID, Protected Health Information (PHI), and Social Security Number (SSN). The groups represented in the system for which PII is collected are Service members, Department of Defense (DoD) beneficiaries, Department of Veteran Affairs patients, civilian patients, and foreign nationals.

EBMS-Transfusion is accessible to authorized users, including those who may be considered the general public (i.e., government civilians, military, and contractors), from 20 DHA Blood Donor Centers (BDCs). Access to a system hosted web application is restricted to the authorized users previously mentioned, and cannot be accessed by the public at large.

EBMS-Transfusion is owned and managed by the Electronic Health Record (EHR) Core Program Management Office (PMO) under the executive management of Defense Health Agency (DHA), DAD IO/J-6, Solution Delivery Division (SDD).

**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 is being collected for verification of the transfusion patient in determining patient suitability for blood transfusions and for the purposes of testing and look-back implications. The intended use of the PII is to support the ASBP mission of providing quality blood products to customers and to ensure a safe and secure blood supply for transfusion patients.

**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.

EBMS-Transfusion is not the initial point of collection of PII/PHI from individuals/patients; therefore, patients do not have the opportunity to object to the collection of their PII.

**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.

EBMS-Transfusion is not the initial point of collection of PII from individuals/patients; therefore, patients do not have the opportunity to consent to the specific uses of their PII.

**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

EBMS-T does not collect PII directly from individuals. Therefore, no Privacy Act Statement or Privacy Advisory is required.

**h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?**

(Check all that apply)

Within the DoD Component

Specify. Defense Health Agency (DHA) MTF Occupational Health Departments (in order to disclose to military personnel test results) and MTF Public Health Departments

Other DoD Components (i.e. Army, Navy, Air Force)

Specify. Army, Navy, & Air Force MTF Occupational Health Departments (in order to disclose to military personnel and beneficiaries test results)

Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

Specify. Department of Veterans Affairs (VA)

State and Local Agencies

Specify.

-Planned Systems International (PSI), Inc.  
-WellSky®

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 following language is contained in all contracts and sub-contracts awarded by the government: "The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with DFAR Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," October 29, 2014, and DoD 5400.11-R, "DoD Privacy Program," May 14, 2007. The contractor shall also comply with federal laws relating to freedom of information and records management.

Under DoD 6025.18-R, "DoD Health Information Privacy Program," January 24, 2003, reasonable steps must be taken to implement appropriate procedural, administrative, technical and physical safeguards to prevent the unauthorized use and/or disclosure of any personally identifiable information (PII) or PHI. Likewise, all uses, disclosures, and destruction of PII and PHI data are generally subject to DoD 5400.11-R, "DoD Privacy Program," May 14, 2007 and DoDI 8580.02, "DoD Security of Individually Identifiable Health Information in DoD Health Care Programs" August 12, 2015." Vendors have entered into a Business Associate Agreement with DHA.

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

Composite Health Care System (CHCS) and/or Armed Forces Health Longitudinal Technology Application (AHLTA). PII is not pulled from MHS GENESIS now or at any time in the future.

Blood Transfusion Request Form

**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)

In-Person Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

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

Official Form – DoD SF-518 is used for Blood or Blood Component Transfusion

Paper Format – Blood Transfusion Request Form

Information Sharing - System to System – Composite Health Care System (CHCS) and/or Armed Forces Health Longitudinal Technology Application (AHLTA)

**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      EDHA 25

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.      DAA-0330-2016-0001-0003

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

(3) Retention Instructions.

FILE NUMBER: 911-32

DISPOSITION: Temporary. Cut off annually. Destroy 10 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.

Authorities: 10 U.S.C., Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 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.

EBMS-T does not require an OMB since the system is not covered by the Paperwork Reduction Act (PRA) in accordance to control number in accordance with DoDM 8910.01 v.2, Enclosure 3, Section 8, Subsection b(5).