

## 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:**

Composite Health Care System (CHCS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

08/12/2022

### 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.**

Composite Health Care System (CHCS) is a fully integrated health care information system used in Department of Defense (DoD) Military Treatment Facilities (MTFs) and clinics. It is used to automate and integrate the functions performed by the hospital staff and to facilitate the delivery of health care and MTF's administration. Data elements include beneficiary information collected and used to support the delivery of health care to Defense Health Agency's (DHA's) beneficiaries. In addition, user data is collected to support authentication, authority, and access to CHCS.

CHCS collects the following Personally Identifiable Information (PII): contact information, demographic information, employment information, military records, disability information, financial information, child information, medical information including Protected Health Information (PHI). PII and PHI is collected to determine eligibility and administer health care delivery services. Clinical patient data is documented and stored in the patient files in CHCS. The data is used for patient care management. Defense Enrollment Eligibility Reporting System (DEERS) is the source system for patient demographic, enrollment, and eligibility data. Demographic data is collected and used for direct entry into CHCS by a health care provider and/or administrator. CHCS exchanges data with DEERS and Auto Registration Bulk Process. The Auto Registration Bulk Process is part of CHCS that shares data with DEERS for ID validation and demographics downloading into CHCS and is used for mass registration of recruits, brigades, etc.

The following individuals whose information is stored in this system includes: Active Duty Military (all Services to include the Reserve, National Guard, and Coast Guard), veterans, dependents, retirees and/or their dependents, contractors, foreign nationals, former spouses, and prisoners of war.

Composite Health Care System is owned and operated by DHA's Solution Delivery Division.

**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 collected for verification, identification, authentication, and data matching. The intended use of the PII is to support the administrative and clinical functions of billing, patient administration procedures, verifying the identification of patients, patient tracking, etc.

**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.

Individuals have the opportunity to object to the collection of their PII during registration, verbally. If an individual chooses to object to the collection of their PII, it may delay healthcare.

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.

Individuals have the opportunity to consent to the specific use of their PII during registration on a form. If an individual chooses not to consent for the specific use of their PII, it may result in administrative delays in receiving comprehensive healthcare in a timely fashion.

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: Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. Ch. 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD Manual (DoDM) 6025.18, "Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs;" and E.O. 9397 (SSN).

PURPOSE: The Composite Health Care System ("CHCS") is a fully integrated health care information system used in Department of Defense ("DoD") Military Treatment Facilities ("MTFs") and clinics. It is used to automate and integrate the functions performed by the hospital staff and to facilitate the delivery of health care and MTF's administration. Data elements include beneficiary information collected and used to support the delivery of health care to Defense Health Agency's ("DHA's") beneficiaries. In addition, user data is collected to support authentication, authority, and access to CHCS.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows: to contractors and others performing or working for the Federal Government when necessary to accomplish an agency function related to this System of Records; to the Department of Health and Human Services, other federal agencies, and academic institutions for the purposes of public health activities and conducting research; to the Department of Veteran's Affairs (VA) for the purpose of providing medical care, to determine the eligibility for benefits, to coordinate cost sharing activities, and to facilitate collaborative research activities between the DoD and VA; to the National Research Council, National Academy of Sciences, National Institutes of Health, Armed Forces Institute of Pathology, and similar institutions for authorized health research; to local and state government and agencies for compliance with local laws and regulations governing public health and welfare programs; and, among others, to federal offices and agencies involved in the documentation and review of defense occupational and environment exposure data. For a complete listing of the Routine Uses for this system, specifically those regarding disclosures to the Department of Justice, competent law enforcement authorities, Court and administrative law proceedings, the National Archives, and Records Management, Congress, and other appropriate Federal and non-Federal agencies, entities, and persons related to DoD breach detection and response efforts, refer to the applicable SORN.

Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Rules, as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

APPLICABLE SORN: EDHA 07, Military Health Information System (June 15, 2020; 85 FR 36190) <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/DHA/EDHA-07.pdf>

DISCLOSURE: Voluntary. If you choose not to provide the requested information, there may be an administrative delay; however, care will not be denied and no penalties will be imposed.

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.

Other DoD Components

Specify.

Other Federal Agencies

Specify. National Security Agency  
The Army Corps of Engineers  
National Guard  
Defense Logistics Agency  
National Research Council  
National Academy of Sciences  
National Institutes of Health (NIH)  
Department of Health and Human (HHS)  
Congressional Budget Office  
Department of Veterans Affairs (VA)  
U. S. Coast Guard (USCG)

State and Local Agencies

Specify. All local and state government Health Department  
Communicable Disease offices as required by law

LEIDOS is the contractor. The Contractor shall provide for the completion of a PIA for any applicable systems that collect, maintain, use or disseminate PII or PHI about members of the public, federal personnel, contractors, or in some cases foreign nationals. The Contractor shall establish practices that satisfy the requirements of DoDI 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance." (February 12, 2009). The Contractor shall consult with the DHA Privacy Office to determine if the Contractor must obtain a Data Sharing Agreement (DSA) or Data Use Agreement (DUA), when MHS data that is managed by DHA will be accessed, used, disclosed or stored, to perform the requirements of this Contract. The Contractor shall comply with requests for additional documentation by the DHA Privacy Board when requesting PHI for research. In addition, the Contractor shall submit any research requests for MHS data that include PHI to the DHA Privacy Board in order to be reviewed for HIPAA compliance. The Contractor shall comply with the permitted uses established in a DSA/DUA to prevent the unauthorized use and/or disclosure of any PII/PHI, in accordance with the HIPAA Rules and the DoD HIPAA Issuances. Likewise, the Contractor shall comply with the DoD Privacy Act Issuances.

The Contractor shall ensure that its entire staff, including subcontractors and consultants that perform work on this Contract receive training on the Privacy Act, HIPAA, the Alcohol, Drug Abuse and Mental Health Administration (ADAMHA) Reorganization Act, 42 U.S.C. 290dd-2, and the ADAMHA implementing regulations, 42 CFR Part 2. The Contractor shall ensure all employees and subcontractors supply a certificate of all training completion to the Contracting Officer's Representative (COR) within 30 days of being assigned and on an annual basis thereafter. In accordance with 45 CFR 164.502(e)(1)(ii) and 164.308(b)(2), respectively, as applicable, the Contractor shall ensure that any subcontractors that create, receive, maintain, or transmit PHI on behalf of the Contractor agree to the same restrictions, conditions, and requirements that apply to the Contractor with respect to such PHI. With respect to individual rights of access to PHI, the Contractor shall make available PHI in a designated record set to the individual or the individual's designee as necessary to satisfy DHA's obligations under the DoD HIPAA Issuances and the corresponding 45 CFR 164.524. The Contractor shall maintain and make available to the Government the information required to provide an accounting of disclosures to the MHS or to the individual as necessary to satisfy DHA's obligations under the DoD HIPAA Issuances and the corresponding 45 CFR 164.528. The Contractor shall make any amendment(s) to PHI in a designated record set as directed or agreed to by DHA, or take other measures as necessary to satisfy DHA's obligations under the DoD HIPAA Issuances and the corresponding 45 CFR 164.526.

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.)



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

Other Federal Information Systems

Existing DoD Information Systems:

Defense Enrollment Eligibility Reporting System (DEERS)

Anatomic Pathology Laboratory Information Systems (APLIS)

**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)

DA 4465 - Patient Intake/Screening Record

**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 07

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.

N1-330-11-001, Item 1

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

(3) Retention Instructions.

FILE NUMBER: 911-17

Temporary. Cut off upon last episode of patient care or last entry to the patient record is annotated. Destroy 75 years after cut off.

**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

**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 Office Management and Budget approval is not required because CHCS is not the initial collection point for the information it processes in accordance with DoDM 8910.01, v2, Encl 3, paragraph 8b(2). The supporting documents in CHCS are obtained from existing DoD information systems.