

## 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:**

Coding and Compliance Editor (CCE)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

04/05/23

Defense Healthcare Management System (DHMS) Program Executive Office (PEO)

### 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 Coding and Compliance Editor (CCE) system is a commercial off-the-shelf (COTS) product that allows the Military Health System (MHS) to implement a solution focusing on an important series of coding, compliance, and data management objectives. The purpose of CCE is to improve the accuracy of coding for both inpatient and outpatient services rendered through the use of expert coding and editing tools. Timely, accurate and appropriate reimbursement of health care services necessitates comprehensive processes that are well integrated with administrative, clinical and financial systems.

CCE provides: a coding system with expert clinical decision logic and integrated references to enable consistent, accurate and complete International Classification of Disease-10-Clinical Modification/Procedure Coding System (ICD-10-CM/PCS) and Common Procedural Terminology-4 (CPT-4) coding; editing and grouping software with expected reimbursement (i.e. Diagnosis Related Groups (DRGs), Ambulatory Patient Groups (APGs) and Resource Based Relative Value System (RBRVS)) as well as clinical resource and payer edits for inpatient and outpatient care; compliance with Medicare Code Editor (MCE), National Correct Coding Initiative (NCCI), Outpatient Code Editor (OCE) and Medical Necessity guidelines that address inpatient and outpatient coding compliance issues; and data collection and analysis of patient information and coded data for operational management and performance improvement. These features improve accuracy during the collection phases. The primary goal for the DoD CCE system is to implement a more efficient method for documenting the level of services and procedures performed using current industry coding and compliance practices and guidelines to improve ambulatory coding processes.

The types of personal information, including Protected Health Information (PHI), sent to CCE by the Composite Health Care System (CHCS) or MHS Genesis consists of personal descriptors, ethnicity, patient demographic data, and social security numbers. Personal information is collected from DoD beneficiaries, including members of the Armed Forces, their family members and others entitled to DoD health care.

CCE is owned by Defense Health Agency (DHA) and is managed by the Defense Healthcare Management System (DHMS) Program Executive Office (PEO).

**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 collected is used for data matching. The intended use of the PII/PHI in the CCE is to query data and review coding on patient encounters. The CCE system improves the accuracy of coding for both inpatient and outpatient services rendered to MHS beneficiaries, and optimizes the reimbursement process with these expert coding and editing tools. Without the gathering of this data, accurate coding would not be able to be performed resulting in downstream billing issues for the Military Treatment Facilities (MTF).

**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 do not have the opportunity to object to the collection of their PII as CCE is not the initial point of collection for 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.

Individuals do not have the opportunity to consent to the specific uses of their PII as CCE is not the initial point of collection for 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

CCE 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)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Within the DoD Component   | Specify. DHA Military Treatment Facilities (MTF)s |
| Other DoD Components (i.e. Army, Navy, Air Force)              | Specify.  |
| Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify.  |
| State and Local Agencies                                       | Specify.  |

Contractor Name: Planned Systems International

Contract Language (Section 6, para 6.2.6 "Health Insurance Portability and Accountability Act (HIPAA) The Contractor shall comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) (P.L. 104-191) requirements, specifically the administrative simplification provisions of the law and the associated rules and regulations published by the Secretary, Health and Human Services (HHS) and the published Defense Health Agency (DHA) implementation directions. This includes the Standards for Electronic Transactions, the Standards for Privacy of Individually Identifiable Health Information and the Security Standards. It is expected that the Contractor shall comply with all HIPAA-related rules and regulations as they are published and as DHA requirements are defined (including identifiers for providers, employers, health plans, and individuals, and standards for claims attachment transactions).

Contract Language (Section 6.3 para 1.48) Personally Identifiable Information (PII) and Protected Health Information (PHI): The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data in accordance with the approved categorization specifying the protections that need to be afforded to the data types captured within the categorization. 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," May 8, 2007, 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"

Contract Language (Section 6.3 para 1.49)The Contractor shall comply with all requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) (Pub. L. 104-191), as implemented by the HIPAA Privacy and Security Rules codified at 45 C.F.R. Parts 160 and 164, and as further implemented within the Military Health System (MHS) by DoD 6025.18-R, "DoD Health Information Privacy Regulation," January 24, 2003, and DoD 8580.02-R, "DoD Health Information Security Regulation, July 12, 2007. The Contractor shall also comply with all applicable HIPAA-related rules and regulations as they are published and as further defined by later-occurring Government requirements

The contract contains language which require the contractor to comply with the Privacy Act of 1974, as amended.

*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.)*

x

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

- Existing DoD Information Systems
- Other Federal Information Systems

Databases

Commercial Systems

CHCS system  
MHS Genesis system

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

- |  |   |
|--|---|
| <input type="checkbox"/> E-mail  | Official Form (Enter Form Number(s) in the box below) |
| <input type="checkbox"/> In-Person Contact                                 | Paper   |
| <input type="checkbox"/> Fax   | Telephone Interview                                   |
| <input checked="" type="checkbox"/> Information Sharing - System to System | Website/E-Form  |
| Other (If Other, enter the information in the box below)                   |   |

**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.dod.mil/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.      GRS 5.1, Item 020 (DAA-GRS-2016-0016-0002)
- (2) If pending, provide the date the SF-115 was submitted to NARA.
- (3) Retention Instructions.

FILE NUMBER: 1601-17

DISPOSITION: Temporary. Cut off and destroy immediately after copying to a record keeping system or otherwise preserving. For CCE records will be cutoff and destroyed immediately after copying to the Composite Health Care System (CHCS) or 379 days after MHS Genesis go-live, whichever is sooner.

Authority: GRS 5.1, Item 020 (DAA-GRS-2016-

**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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter 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 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs; 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.

CCE does not directly collect information from the public; the source of this information comes from CHCS or MHS Genesis.