## 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:

Immunization Healthcare Branch Back Office (IHB-BO)

2. DOD COMPONENT NAME:

Defense Health Agency 05/16/23

Assistant Directors-Combat Support (AD-CS)/Public Health Division, Immunization Healthcare Division (IHD)

## 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

x 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

x 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.

Immunization Healthcare Branch Back Office (IHB-BO) is a Common Access Card (CAC) enabled application that is used by Immunization Healthcare Division (IHD) staff to support the Military Health System (MHS) by providing Department of Defense (DoD), Defense Health Agency (DHA), military Service, and immunization/clinical stakeholders with continuously updated references and guidance to assist in achieving compliance in the management of immunizations across the MHS; clarifying immunization issues; and aggregating and defining immunization requirements for the combatant commands. IHB-BO also maintains a master listing of DoD facilities worldwide that administer immunizations and the management of the IHD's Continuous Quality Immunization Improvement Process (CQIIP) and Virtual Continuous Quality Immunization Improvement Process (VCQIIP) assessments designed to foster the quality of immunizations delivered across the DoD. IHB-BO includes additional modules that are critical to the effective operation and management of IHD and its Regional Vaccine Safety Hubs (RVSH). Additional modules include Clinic Vaccine Redistribution/Compromise/Inventory which allow IHD staff to assist DoD clinics with transferring unused vaccines or destroying expired vaccines. Management/RVSH/Regional Dashboards are also used by IHD RVSH Directors and Senior Leaders to monitor the workload of assigned IHD staff members. Mapping is an additional automated tool used to visualize location of clinics and visualize the use and non-use of certain vaccines in different regions. The Quality Improvement tools, CQIIP and VCQIIP, allow IHD staff members to provide outreach and quality improvement support to 1200+ DoD Immunization Clinics to ensure they are providing quality immunization healthcare and operating according to DoD/Federal regulations. The Personally Identifiable Information (PII) that IHB-BO may collect includes demographic information, work contact information, and personal e-mail addresses. The categories of individuals on whom PII is collected include Federal employees and Federal contractors.

IHB-BO previously included a module for Immunization University (ImzU), which collected account registration information on all DoD clinic staff members for training on the vaccines administered by DoD. The training is now provided by DHA's Education Division, and the ImzU account registration information was deleted from IHB-BO by 1 March 2022.

IHD is the sole owner of IHB-BO application.

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 is collected for identification and authentication purposes to match the clinic point of contacts with their immunization clinics. IHD staff members also use the PII collected to schedule required clinic virtual or in person site visits relating to the quality improvement tools and to assist a clinic with any and all issues that might occur with administration and shipment of DoD required vaccines.

- e. Do individuals have the opportunity to object to the collection of their PII? X Yes
- (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.

3. PIA APPROVAL DATE:

Individuals may object to the collection of their PII when asked by clinic staff which may be via an in-person site visit, virtual visit or telephone. However, in doing so individuals may not be able to perform their job duties to the fullest extent.

- f. Do individuals have the opportunity to consent to the specific uses of their PII? X 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 may give or withhold consent to the uses of their PII when asked by clinic staff which may be via an in-person site visit, virtual visit, or telephone. However, in doing so individuals may not be able to perform their job duties to the fullest extent.

- 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.)
  - x Privacy Act Statement Privacy Advisory Not Applicable

AUTHORITY: 10 U.S.C. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; and E.O. 9397 (SSN), as amended.

PURPOSE: Immunization Healthcare Branch Back Office ("IHB-BO") is a Common Access Card ("CAC") enabled application that is used by Immunization Healthcare Division ("IHD") staff to support the Military Health System ("MHS") to provide Department of Defense, Defense Health Agency, military Services, and immunization/clinical stakeholders with continuously updated references and guidance to assist in achieving compliance in the management of immunizations across the MHS; clarifying immunization issues; and aggregating and defining immunization requirements for the combatant commands.

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 the Department of Veteran's Affairs (VA), other federal agencies, and private physicians to inform and support the medical care of individuals; to the Department of Health and Human Services, the Occupational Health and Safety Administration, and other federal agencies for statutory and regulatory compliance; to government and non-government organizations for the conduct of health-related research following Institutional Review Board review; and the DoD Blanket Routine Uses set forth by the Office of Secretary of Defense applies to this system.

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 19, Defense Occupational & Environmental Health Readiness System – Industrial Hygiene (DOEHRS-IH) (November 18, 2013; 78 FR 69076) https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570682/edha-19/

DISCLOSURE: Voluntary. If you choose not to provide the requested information, it may lead to a failure to complete assigned job duties; however, no penalties will be imposed.

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)

x Within the DoD Component Specify. DHA Immunization Healthcare Division

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 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.)

NETImpact Strategies. Contract provisions that safeguard PII include are found in section 6.3 of CAE-19-02989-Backoffice Performance of Work Statement (PWS). Reference to DHA Procedures, Guidance and Information 224.90 provides implementing language and Defense Health Agency (DHA) processes for compliance with requirements set forth in Federal Acquisition Regulation (FAR) Part 24 and Defense Federal Acquisition Regulation Supplement (DFARS) Part 224, pertaining to federal privacy and information laws, including the Health Insurance Portability and Accountability Act (HIPAA) Privacy, Security and Breach Rules, 45 CFR Parts 160 and 164, as amended, issued by the Department of Health and Human Services (DHHS); the Privacy Act of 1974, as amended; and the EGovernment Act of 2002.

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

Specify.

Specify.

i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)

X Individuals Databases

x Existing DoD Information Systems Commercial Systems

Other Federal Information Systems

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

x E-mail Official Form (Enter Form Number(s) in the box below)

X In-Person Contact Paper

Fax X Telephone Interview

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

Clinic staff may pull PII from the Global Address List (GAL) and Military Treatment Facility (MTF)/Clinic websites for entry into the system.

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.

**x** Yes No

If "Yes," enter SORN System Identifier EDHA 19

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.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. Unscheduled
  - (2) If pending, provide the date the SF-115 was submitted to NARA.

AEM Designer Page 3 of 10

(3) Retention Instructions.

Unscheduled - Permanent. Treat system and/or records maintained in the system as permanent until a NARA approved schedule and disposition authority has been applied.

- 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 statue 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. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; 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 X 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 IHB-BO application itself does not serve to collect information from members of the public.