

## 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:**

Siemens CLINITEK Advantus Series Analyzers AI

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

10/24/23

CyberLOG

### 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 Siemens CLINITEK Advantus Series is a semi-automated urine chemistry analyzer. Tests measured include Leukocyte, Nitrite, Protein, Blood, Glucose, Ketone, Bilirubin, Urobilinogen, pH, Specific Gravity, Creatinine, and Protein-to-Creatinine Ratio. This Medical Device Equipment (MDE) receives certain Personally Identifiable Information (PII) from the Composite Health Care System (CHCS), or its replacement MHS GENESIS, and returns to that same source: Sample ID, Patient Name, Test Date, Laboratory Name and Device ID. This medical device directly or indirectly via middle-ware, or a Defense Information Infrastructure (DII) system, also returns to CHCS test results generated from urine samples.

CLINITEK Advantus collects PII, including demographic information, medical information, and Protected Health Information (PHI). The categories of individuals on whom PII is collected include active duty military members, retirees, and their family members.

CyberLOG is responsible for the Risk Management Framework (RMF) process and gaining an approval from DHA J6 Risk Management Executive Division (DHA J6 RMED). Local sites address day to day operations, maintenance, and management of the CLINITEK Advantus. Sites ensure the software is configured to meet CyberLOG and RMED approved configurations.

**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/PHI is used for mission-related purposes to support the delivery of health care services. The intended uses of the PII/PHI is to ensure the test results generated by the MDE were generated for the correct individual and were inserted into the correct medical record.

**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 CLINITEK Advantus is not the initial point of collection.

**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 give or withhold consent to specific uses of their PII as CLINITEK Advantus is not the initial

point of collection.

**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

CLINITEK Advantus 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.    DHA MTFs

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.)                      Specify.    The Military Treatment Facilities (MTF) may utilize contractor services to support this product. DoD policy requires such contracts include language to safeguard PII including FAR clauses: 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and FAR 39.105, Privacy. When the contractor has access to PHI, a HIPAA Business Associate Agreement is also required.

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), MHS GENESIS

**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)

**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://dpcltd.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 5.2, item 020 (DAA-GRS-2017-0003-0002)

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

(3) Retention Instructions.

FILE NUMBER: 103-14

DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate).

**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 USC, Chapter Ch. 55, Medical and Dental Care; 10 USC 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 USC 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 USC 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 USC 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 USC 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 USC 290dd, Substance Abuse Among Government and Other Employees; 42 USC 290dd-2, Confidentiality Of Records; 42 USC 42 USC Ch. 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; DoDI 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 EO 9397 (SSN).

**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 information collected in this system is for the diagnosis and treatment of medical disorders and not considered a public information collection in accordance with DoDM 8910.01, Volume 2, Enclosure 3, paragraph 8b(5).