

## 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:**

DHA E-Commerce System (DHA ECS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

12/04/23

### 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 Defense Health Agency E-Commerce System (DHA ECS) provides an integrated contract management suite and financial management applications supporting private sector care. DHA ECS contract management capabilities include healthcare contract solicitation, award, administration, deliverable management, performance management, and operations management. DHA ECS's financial management capabilities include budget accounting, financial accounting, receivables and payables accounting; healthcare claims payment, and debt collection.

DHA ECS utilizes web-based, locally developed and Commercial-Off-The-Shelf (COTS) software to achieve its mission.

In support of contract management, healthcare claims payment, and debt collection, the DHA ECS program receives, maintains, and disseminates Personally Identifiable Information (PII), including names, home/cell phone, mail/home address, military records, birth date, financial information, marital status, child information, gender/gender identification, other ID number, SSN, and other (Spouse Information, Work fax number, and Sponsor SSN). The PII, which resides in the DHA ECS, pertains to the following categories of individuals: Military Health System (MHS) beneficiaries, business partners/contacts, hospitals, physicians, pharmacies, and other providers.

DHA ECS systems do not contain PHI data at this time, however DHA ECS understands the potential of shared PHI by its feeder systems, and thus has established the controls relative to the collection and handling of PHI data.

Defense Health Agency E-Commerce owns and operates this system.

**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 by the DHA Office of General Counsel (OGC) to document and collect a debt owed to the government by a beneficiary, hospital, or another healthcare-related provider. Also, PII related to the contract deliverables provides the government a view into the beneficiaries of the service received from the contractor. It allows the government to determine if the contractor fulfills its contractual obligations. DHA ECS receives PII for both administrative and mission-related uses.

**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 because DHA E-Commerce System 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 consent to the specific use of their PII because DHA E-Commerce System 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

Because DHA E-Commerce System collects PII only through information sharing system to system, not directly from an individual, a Privacy Act statement and Privacy Advisory is not 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 Office of General Counsel (OGC)

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

Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) Specify. Department of Treasury

State and Local Agencies Specify.

Managed Care Support Contractors (MCSC) - PII shared to allow DHA to manage deliverables to ensure that contractors are abiding by the contract requirements.

All MCSC contracts contain language which requires the contractor to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule and the HIPAA Security Rule.

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. MCSC contracts also contain:  
52.224-1 Privacy Act Notification. (Apr 1984)  
52.224-2 Privacy Act. (Apr 1984)  
FAR 52.239-1 Privacy or Security Safeguards. (Aug 1996)  
DFARS 252.204-7000 Disclosure of Information. (AUG 2013)  
DFARS 252.204-7012 Safeguarding Covered Defense Information and Cyber Incident Reporting (OCT 2016)

Other (e.g., commercial providers, colleges). Specify. PNC, Bank of America, and Bank One-also known as JP Morgan Chase.

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

Tricare Encounter Data System (TEDS), Managed Care Support Contractors (MCSC), DHA Office of General Counsel (OGC)

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)

Web-based DHA E-Commerce applications

**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      EDTMA 04

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.      GRS 1.1, item 010 (DAA-GRS-2013-0003-0001)

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

(3) Retention Instructions.

File Number: 206-09.1

Disposition: Temporary. Cut off after final payment or cancellation. 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.

10 U.S.C. Chapter 55, Medical and Dental Care; 38 U.S.C. Chapter 17, Hospital, Nursing Home, Domiciliary, and Medical 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.

The information collected in this system is for the diagnosis and treatment of medical disorders and does not collect PHI/PII directly from individuals. It is not the initial point of collection for any PHI/PII and is not considered a public information collection IAW DoDM 8910.01, V2, Encl 3, paragraph 8b(5).