

## 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:**

Volpara Health Mammography Reporting System AA

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

01/05/24

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 Volpara Health Mammography Reporting System AA (MRS) medical application allows hospitals to track breast center patients breast related procedures (x-rays, Computed Tomography (CT), Magnetic Resonance Imaging (MRI), medical devices) for the purpose of producing reports to the patient's referring doctor and creates all correspondences with the patients, allows hospitals to track breast center patients, and is used to collect United States (U.S.) military personnel and their family's breast related history and risk factors. Picture Archiving and Communication System (PACS) collects medical images from various medical modalities such as ultrasound systems, CT scanners, MRI scanners, etc., and patient demographic information from Composite Health Care System (CHCS) or Military Health System (MHS) GENESIS. PACS allows medical images to be easily shared across the health care enterprise by storing digital images in a central archive.

The Personally Identifiable Information (PII) collected is personal information and demographic information including Protected Health Information (PHI). The following categories of people in which this system collects personal information includes all Active Duty Members, National Guards, Reservists, Retirees, Veterans, and all of their family members. The PII is collected from both members of the general public and Federal employees.

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

Mammography Reporting System (MRS) is owned and operated by Wilford Hall Army Health Center (AHC).

**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 patient breast related history and risk factors. The intended use of PII is identify and verify patient health information before treatment.

**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 Volpara Health Mammography Reporting System AA 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 uses of their PII because Volpara Health Mammography Reporting System AA 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

Volpara Health Mammography Reporting System AA 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. | Defense Health Agency (DHA) Military Treatment Facility (MTF)  |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. | Army, Navy and Marine Corp   |
| Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)  | Specify. |  |
| State and Local Agencies  | Specify. |  |
| <input checked="" type="checkbox"/> 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. |
| <input checked="" type="checkbox"/> Other (e.g., commercial providers, colleges).   | Specify. | Medical Professionals upon referral.   |

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

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

CHCS, PACS, Armed Forces Health Longitudinal Technology Application (AHLTA), and other existing accredited Hospital Information system or Health Record system within the DoD.

**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                                   |
| <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 - Military Health Information 

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.      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. Cut off and Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

**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 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 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.

Office of Management and Budget (OMB) approval is not required. MRS does not solicit responses from members of the general public as the system does not collect PII directly from individuals.