

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:

Brooke AMC - Ft Sam Houston MEDCOI

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

10/08/24

Brooke Army Medical Center

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 Brooke Army Medical Center (BAMC) Medical Community of Interest (MedCOI) consists of hardware, software, and telecommunications systems providing network security and network data transport services (wide area network communications) for DHA systems. The MedCOI includes user interfaces such as workstations and laptops, hosting medical systems and applications. Commercial-Off-The-Shelf (COTS) applications including Microsoft Word Excel, PowerPoint, and Outlook are utilized to provide administrative support. Data communications to or from any DHA application that involves the MedCOI system are subject to data security monitoring and inspection including, but not limited to, Personally Identifiable Information (PII) data (excluding content of privileged communications [i.e. electronic mail] related to personal representation or services by attorneys, psychotherapists, or clergy, and their assistants).

Sub-systems and applications within the MedCOI may collect, maintain, process, or disseminate Personally Identifiable Information (PII) or documents stored on file servers and shared drives. PII includes employee and beneficiary contact information, military information, demographic information, and Protected Health Information (PHI). Categories of individuals about whom the Personally Identifiable Information (PII) is collected from include: active-duty military (all services + Reserve), Coast Guard, National Guard, veterans, dependents, retirees and/or their dependents, contractors, foreign nationals.

The BAMC MedCOI includes system components, applications, electronic collections, and medical devices which have their own Privacy Impact Assessments in place. BAMC IMD will ensure required DD 2930s unique to our location are submitted.

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 collection of PII is incidental to the administrative and security services performed by MedCOI as described in 1c. which may be collected within the MedCOI audit logs captured by the security services. The intended use is to provide continuity of care, for data matching and to ensure accuracy when reports are integrated into the individual Integrated Electronic Health Record (iEHR).

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.

The opportunity for individuals to object to the collection of PII is presented by the DHA application the user is interacting with. Once a user has agreed to enter PII into the DHA application, that data becomes subject to the inspection/monitoring functions performed by MedCOI that are not optional. Use of government/DoD Information systems constitutes notice that communications are subject to inspection.

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.

The opportunity for individuals to consent to the specific uses of their PII is presented by the DHA application the user is interacting with.

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

The MEDCOI infrastructure does not present any applications for which a user would be required to enter PII. Applicable Privacy Act Statement and/or a Privacy Advisory is presented by the DHA application the user is interacting with.

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.
- 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.
- 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

The source for PII collected within the MedCOI audit logs is any application that utilizes MedCOI for transport. This includes DHA and VA applications such as, MHS GENESIS, Composite Healthcare System (CHCS), and eBenefits that interact with individuals as the source of collection and/or any system to system (i.e. database) communications involving PII.

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

- E-mail
- In-Person Contact
- Fax
- Information Sharing - System to System
- Other (If Other, enter the information in the box below)
- Official Form (Enter Form Number(s) in the box below)
- Paper
- Telephone Interview
- Website/E-Form

MEDCOI collects PII which already exists within the packet data transported across, and inspected/monitored by the MedCOI protection mechanisms against the threats of malware, malformed packets, and viruses; which may then be collected in the MedCOI audit data.

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

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.

The MTF MedCOI is not a system of records and is not used to retrieve records by personal identifier.

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.

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

(3) Retention Instructions.

The LAN/Enclave itself does not have a NARA approved, pending, or GRS authority and retention instructions applied as a whole. Refer to NARA approved, pending, or GRS authority and retention instruction specific to the systems, applications, electronic collections, file servers, and share drives contained within the LAN/Enclave.

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; 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; DoD Instruction 8500.01, Cybersecurity, 14 Mar 2014; DoD Joint Information Environment (JIE) Cyber Security Reference Architecture (CS RA) v 4.0 April 15, 2016; Computer Network Defense (CND) Service Provider Program via DoD Instruction 8530.01, March 7, 2016; DoD Instruction O-8530.2: Support to Computer Network Defense (CND), March 9, 2001.

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 MTF MedCOI enclave does not collect information from members of the public.