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 Ask Sage   DHA-AS

2. DOD COMPONENT NAME:	**3. PIA APPROVAL DATE:**
Defense Health Agency	07/24/2025

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.

Ask Sage AI for .mil environment: Ask Sage is a Secure & Extensible Multi-modal Generative AI platform that specializes in enabling secure access to Generative AI models for both government and commercial teams. Ask Sage is built on cutting-edge Generative AI technologies such as Azure OpenAI (Gov) GPT 3.5 and 4 and several open-source Large Language Model (LLM). Ask Sage is a complete multi modal platform that allows for the transcription and analysis of spoken language content in almost any language. The platform's data ingest and training are model-agnostic, ensuring secure training of proprietary data without ingesting it into the models. Ask Sage implements data-centric security and label data on a per-user basis, sharing labels with team members as needed and preventing data spillage by enabling zero-trust security. Ask Sage can ingest custom data, connect to APIs, and access data lakes for real-time insights, delivering human-like responses to assist teams with labor-intensive tasks and enabling them to focus on strategic initiatives. The system may not intentionally collect PII/PHI, however, through the end user inputting information there maybe enough information that is combined to be considered PII/PHI or the end user may enter PII/PHI while using the 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)*

PII provided by end user is for the DHA medical community users, specifically in support of their clinical and business workflows within the Government AI Environment.

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.

This system receives PII from a system-to-system interface and a Multi-modal Generative AI Platform. The opportunity to object is only available at the source system, which is covered under a separate PIA for that POR.

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.

This system receives PII from a system-to-system interface and a Multi-modal Generative AI Platform. The opportunity to object is only available at the source system, which would be covered under a separate PIA for that POR.

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 AI system will not ask the user to provide any PII/PHI all information that is used is voluntarily provided.

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
☒ Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	DHMS, Navy, Army, Air Force, VA
☐ 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.	Contractors include: Spinvi, Accelera Solutions, Core4ce, KSH, NSSPlus, BEAT, DXC, SpinSys providing system administration for Ask Sage DHA-AS and adhere to the safeguards for PII as required by their respective contracts: When a contractor, including any subcontractor, is authorized access to Personally Identifiable Information (PII), the contractor shall complete annual PII training requirements and comply with privacy protections under the Privacy Act (Clause 52.224-1 and 52.224-2). The contractor shall safeguard PHI/PII from theft, loss, and compromise, and shall safeguard, transmit and dispose of PHI/PII per latest DHA and DoD policies and the contractor's HIPAA Business Associate Agreement (BAA). The contractor shall mark documentation containing PII accordingly in either the header or footer of the document: "CUI, – Privacy Sensitive. Misuse or unauthorized disclosure may result in both criminal and civil penalties." Unauthorized disclosure of privacy sensitive information through negligence or misconduct can lead to task order removal or task order termination depending on the severity of the disclosure. Upon discovery of a PII breach, the contractor shall immediately notify the Contracting Officer and contracting officer representative (COR).
☐ 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	

Ask Sage is built on cutting-edge Generative AI technologies such as Azure OpenAI (Gov) GPT 3.5 and 4 and several open-source LLMs.

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)*	

Azure OpenAI (Gov) GPT 3.5 and 4 and several open-source LLM and external AI environments.

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://dpcld.defense.gov/Privacy/SORNs/
    o*r*

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 Ask Sage system is not a system of records.

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 5.2, item 020 (DAA-GRS-2022-0009-0002)

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

(3) Retention Instructions.

FILE NUMBER: 103-14
FILE TITLE: Intermediary Records
DISPOSITION: Temporary. Cut off and destroy upon creation or update of the final record, 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 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 USC Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoD 6025.18-R Health Information Privacy Regulation; DoDI 8580.02 Security of Individually Identifiable Health Information in DoD Health Care Programs; 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.

Ask Sage as a system does not actively collect or PHI/PII information for use outside of the internal DHA organization. The information available in this system is for the diagnosis and treatment of medical conditions and is not considered a public information collection per DoDM 8910.01, V2, Encl 3, paragraph 8b(5).