

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:

System for Injury and Monitoring Outcomes Nexus (SIMON)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

02/26/2026

Future Registry Operations Branch Joint Trauma System

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 System for Injury Monitoring and Outcomes Nexus (SIMON) is the modernization effort for the Department of Defense Trauma Registry (DoDTR), the world's largest combat trauma registry. The initiative addresses critical limitations of the legacy system—including 100% manual data abstraction, fragmented data capture, and slow dissemination—by establishing a cloud-based, AI/ML-enabled registry platform. SIMON will leverage automation to support medical record abstraction, maximize passive data flow from point-of-injury devices and clinical systems, and adopt the OMOP Common Data Model to ensure interoperability, standardization, and research readiness. This modernization will significantly enhance the Defense Health Agency and Department of Defense Trauma Enterprise's ability to provide near real-time decision-making, performance improvement, and predictive analytics in support of battlefield survivability and force readiness. By improving data quality, accelerating dissemination, and enabling advanced analytics, SIMON ensures compliance with DoD directives (DoDI 6040.47, DoDI 1322.24, JP 4-02) and positions the SIMON as a powerful, future-ready capability for trauma care optimization and data-driven operational medicine.

System Components integrated into SIMON are:

- Department of Defense Trauma Registry (DoDTR)
- Trauma Outcomes (Inactive)
- Military Orthopedic Trauma Registry (MOTR)
- Traumatic Brain Injury (TBI)
- Autologous Health Incident (AHI) - Sub-module of TBI
- Infectious Disease (ID) including COVID Sub-module (Inactive)
- Acoustics (Inactive)
- Ophthalmology (inactive)

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 is collected for mission related purposes of tracking the longitudinal care and outcomes, to analyze battlefield casualty, emerging infectious diseases or pandemic pathogen related illness/injury, and to ensure the correct information is attributed to the correct individual in the registry.

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 /PHI because this system is not the initial point of collection;

however, the source system may provide the individual the opportunity to object to the 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 object to the collection of their PII /PHI because this system is not the initial point of collection; however, the source system may provide the individual the opportunity to object to the 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

This system is not the initial collection point for the PII. The PII is obtained from an existing DoD information system or electronic collection, 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; Infectious Disease Clinical Research Program (IDCRP); Uniformed Services University of the Health Sciences (USUHS)

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

Specify.

Army Joint Trauma Analysis & Prevention of Injury in combat (JTAPIC); Navy Health Research Center (NHRC), Air Force; Armed Forces Medical Examiner Office

Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

Specify.

Veterans Affairs (VA); Vision Center of Excellence (VCE)

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.

Cherokee Nation Technology Solutions, Cherokee Nation Operational Solutions, Cherokee Nation Integrated Health, Advanced Technology Applications (ATA), QiPath, Contracts cite 52.224-1 Privacy Act Notification, 52.224-2 Privacy Act, FAR Part 39.105. and require compliance with the Privacy Act and HIPAA.

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

Expeditionary Medical Encounter Database (EMED); Armed Forces Health Longitudinal Technology Application (AHLTA)/Theater (AHLTA-T); TRANSCOM Medical Regulating and Command & Control; Evacuation System (TRAC2ES); Theater Medical Data Store (TMDS); Essentris; Joint Legacy Viewer (JLV); Health Artifact and Image Management Solution (HAIMS); Web Interface to Scan Patient Records (WISPR); Defense Enrollment Eligibility Reporting System (DEERS); Theater Composite Health Care System Cache' (Inpatient Theater) (TC2); IMPAX Radiology images and reporting software; Carepoint/MHS Information Platform (MIP); Military Health System (MHS) GENESIS; American College of Surgeons Trauma Quality Improvement Program (ACS TQIP)

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)

DD3019, Resuscitation Record; SF600, Chronological Record of Medical Care; DD1380 Tactical Combat Casualty Care (TCCC); DA4700 Patient Care Record; CDC OMB 0920-1011, Human Infection Novel Corona-virus Person Under Investigation (PUI) & Case Report

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.

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.

Unscheduled - Permanent. Treat system and/or records maintained in the system as permanent until a NARA approved schedule and disposition authority has been applied.

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.

National Defense Authorization Act for FY 2017, Public Law 114-328, Section 707 and Section 708, Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 USC 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 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; DoDI 6025.18, Health Insurance Portability And Accountability Act (HIPAA) Privacy Rule Compliance In DoD Health Care Programs; EO 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 and is not considered a public information collection in accordance with DoDM 8910.01, V2, Encl 3, paragraph 8b(5).