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:

Special Needs Program Management Information System (SNPMIS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

03/23/2026

Portfolio Acquisition Executive for Medical Digital Solutions (PAE MDS)

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.

Special Needs Program Management Information System (SNPMIS) provides access to a comprehensive program of therapy, medical support, and social services for young TRICARE beneficiaries with special needs. SNPMIS is the Defense Health Agency (DHA) automated information system designed to ensure the Department of Defense (DoD) meets the unique information requirements associated with implementation of the Individuals with Disabilities Education Act (IDEA).

SNPMIS captures referral, evaluation, eligibility, and service plan data for children with special needs who are eligible for early intervention and special education services under IDEA. Management reports provide historical analysis to monitor ongoing improvements in quality of care initiatives. It also allows program managers to identify areas where additional services are needed. At the service level, activities of different programs can be compared to determine best practices that can be implemented throughout the Educational and Developmental Intervention Services (EDIS) clinics. SNPMIS is a workflow (subscribing system) hosted on the Healthcare Artifact and Imaging Management Solution (HAIMS) OpenText platform.

Categories of personally identifiable information (PII) and protected health information (PHI) collected by SNPMIS include personal descriptors, contact information, medical information, and educational program information. Records contained in the system may be retrieved by name or other unique identifier. SNPMIS is currently used in 43 EDIS clinics at Army, Navy, and Air Force installations worldwide.

Categories of individuals from whom SNPMIS collects PII and PHI include children of members of the Armed Forces and civilians (i.e., authorized DoD Beneficiaries) who are entitled to receive early intervention and special education services from the DoD under IDEA.

SNIPMIS is owned and managed by the Care and Benefits Integrated Systems Program Management Office (CBIS PMO)/Portfolio Acquisition Executive for Medical Digital Solutions (PAE MDS).

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)*

SNPMIS collects PII for mission-related use. PII is collected by SNPMIS to monitor the developmental and educational services provided by EDIS clinics for quality assurance purposes and to ensure that DoD meets the unique information requirements associated with implementation of IDEA.

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 have the opportunity to object to the collection of their PII verbally by refusing to fill out required SNPMIS forms or during family interviews, where parents have the option to "decline to state" on non-essential data (e.g., race and ethnicity). The collection of PII in the system is voluntary. However, failure to provide certain information necessary to determine eligibility may result in the denial of services.

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 have the opportunity to consent to the specific use(s) of their PII verbally by refusing to fill out required SNPMIS forms or during family interviews, where parents have the option to "decline to state" on non-essential data (e.g., race and ethnicity). The collection of PII in the system is voluntary. However, failure to provide certain information necessary to determine eligibility may result in the denial of services.

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

AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 20 U.S.C. Chapter 33, Education of Individuals with Disabilities; 20 U.S.C. 921, Defense Dependents' Education System; DoD Instruction 1342.12, Provision of Early Intervention and Special Education Services to Eligible DoD Dependents; and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information necessary to determine a child's eligibility for Educational and Development Intervention Services (EDIS) and to plan and deliver appropriate services to eligible families.

ROUTINE USE(S): Use and disclosure of your records outside of DoD may occur in accordance with the Privacy Act of 1974, as amended (5 U.S.C. 552a(b)). Information in your records may be disclosed to the Joint Commission on Accreditation of Healthcare Organizations to comply with certain standards and accreditation requirements. Collected information may also be shared with the Departments of Health and Human Services, Homeland Security, and Veterans Affairs, and other Federal, State, local, or foreign government agencies, authorized private business entities, including entities under contract with the Department of Defense and individual providers of care, on matters relating to eligibility, claims pricing and payment, fraud, program abuse, utilization review, quality assurance, peer review, program integrity, third-party liability, coordination of benefits, and civil or criminal litigation.

Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, healthcare operations, and the containment of certain communicable diseases.

For a full listing of the applicable Routine Uses, refer to the applicable SORN.

APPLICABLE SORN: EDHA 16, Special Needs Program Management Information System (SNPMIS) Records (November 18, 2013, 78 FR 69076) is the system of records notice (SORN) applicable to SNPMIS. The SORN can be found at: https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570679/edha-16-dod/

DISCLOSURE: Voluntary. However, failure to provide certain information necessary to determine eligibility may result in denial of services.

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.	Military Health System (MHS) Military Treatment Facilities (MTFs) (CONUS and OCONUS)
☒ Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	Department of Defense Education Activity (DoDEA); Departments of the Army, Navy, and Air Force
☐ 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).*		Joint Commission on Accreditation of Healthcare Organizations (JCAHO) during on-site accreditation compliance surveys.

Specify. SNPMIS may also send hard copy paperwork (e.g., the Individualized Family Service Plan) to civilian providers on occasion (primarily another CONUS early intervention program), but only after permission is granted by the parent(s).

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

- [x] Individuals
- [ ] Databases
- [ ] Existing DoD Information Systems
- [ ] Commercial Systems
- [ ] Other Federal Information Systems

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

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

Reports from physicians and other medical department personnel; Reports and information from other sources including educational institutions; Medical institutions; Public and private health and welfare agencies.

Official Form: EDIS official forms; EDIS official forms do not possess a DD Form designation.

Information from the family may be collected during an intake meeting, a meeting to develop a service plan, as a result of provision of services, performance of an evaluation, or other coordination activities. The EDIS clinic or Department of Defense Dependents School (DoDDS) must obtain permission from the family before information is collected from or provided to an external agency, and prior to conducting evaluations or providing services. Before information is released to an external agency the parents must sign a Health Insurance Portability and Accountability Act (HIPAA) authorization.

Information may also be collected via telephone interview. Parents often self-refer and the programs begin collecting some basic information at that point in the process.

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.

- [x] Yes
- [ ] No

If "Yes," enter SORN System Identifier EDHA 16

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or http://dpcld.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.

Mission Schedules:
- N1-330-11-003, item 4

Other Schedules:
- System Access Records: GRS 3.2, item 030 (DAA-

GRS-2013-0006-0003),
- Data Administration and Documentation: GRS 3.1, item 051 (DAA-GRS-2013-0005-0003)

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

(3) Retention Instructions.

Mission Schedules:
FILE NUMBER: 911-16
FILE TITLE: Special Needs Program Management Information System (SNPMIS) Master File
DISPOSITION: Temporary. Cut off annually upon child's transition or withdrawal from Educational and Developmental Intervention Services (EDIS). Destroy 5 years after cutoff.

Other Schedules:
FILE NUMBER: 1601-02
FILE TITLE: System Access Records - Systems not requiring Special Accountability for Access
DISPOSITION: Temporary. Cut off and destroy when business use ceases.

FILE NUMBER: 1601-12
FILE TITLE: Data Administration and Documentation - Temporary Systems
DISPOSITION: Temporary. Cut off after the project/activity/transaction is completed or superseded, or the associated system is terminated, or the associated data is migrated to a successor system. Destroy 5 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 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 U.S.C. Chapter 55, Medical and Dental Care; 20 U.S.C. Chapter 33, Education of Individuals with Disabilities; 20 U.S.C. 921, Defense Dependents' Education System; DoD Instruction 1342.12, Provision of Early Intervention and Special Education Services to Eligible DoD Dependents; 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.

SNPMIS itself does not require an OMB Control Number as it is not the initial point of information collection. However, information collected from other resources (i.e., interviews, other systems, forms) and stored in SNPMIS may be considered the initial point of collection and require further review. DHA IMCO will work with the DHA Paperwork Reduction Act (PRA) Liaison to review feeder systems and other collections to ensure full compliance with PRA requirements.