

# 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:**

Interagency Comprehensive Plan for Care Coordination Support (ICPCCS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

04/14/2026

Program Executive Office (PEO) Medical Systems (J6)

**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 Interagency Comprehensive Plan for Care Coordination Support (ICPCCS) is a web-based application supporting the chief mission of the Recovery Coordination Program (RCP) by facilitating improved care, management, and transition from active duty to temporary or permanent retirement for Recovering Service Members (RSM) and other eligible individuals. ICPCCS users include the entire community of personnel performing care coordination and case management work for wounded, ill, or injured Service Members and Veterans, including Recovery Care Coordinators (RCCs) and US Coast Guard (USCG) Workforce & Family Services (WFS) case managers. ICPCCS records are also utilized for statistical analysis, tracking, reporting, evaluating program effectiveness, and conducting research.

The types of personally identifiable information (PII) collected by ICPCCS include personal descriptors, identification numbers (including Social Security Numbers (SSNs) & DoD ID Numbers), personal contact information, work contact information, military records, employment information, marital status, education information, protected health information (PHI), and beneficiary information.

PII is collected from the following categories of individuals: Members of the Armed Forces, Veterans, and eligible Department of Defense (DoD) and Department of Homeland Security (DHS) beneficiaries, civilian employees, and contractor personnel.

ICPCCS is owned and managed by the Care & Benefits Integrated Systems (CBIS) Program Management Office (PMO)/Solution Delivery Division (SDD)/Program Executive Office (PEO) Medical Systems (J-6)/Defense Health Agency (DHA).

**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)

ICPCCS collects PII for mission-related use. The intended use of PII collected by ICPCCS is to improve the care, management, and transition of wounded, ill, or injured Service Members, Veterans, and other eligible individuals.

**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.

Participation in the RCP is voluntary. Individuals may verbally object to the collection of their PII upon contact with RCCs or other case managers; however, refusal to provide requested information may result in significant administrative delay(s) or the loss of services that might otherwise be available.

**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.

Participation in the RCP is voluntary. Individuals may verbally consent to the specific uses of their PII upon contact with RCCs or other case managers; however, refusal to provide requested information may result in significant administrative delay(s) or the loss of services that might otherwise be available.

**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 participant is advised of the Privacy Act when entering into the program for treatment. The participant at this time has the right to refuse providing information into the system.

Authorities: Department of Defense Instruction (DoDI) 1300.24, "Recovery Coordination Program (RCP)"; National Defense Authorization Act (NDAA) for 2008, Sections 1611, 1614, and 1648; NDAA for 2013, Section 738; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 38 U.S.C. 523, Coordination and Promotion of Other Programs Affecting Veterans and their Dependents; DoDI 1332.35, "Transition Assistance Program for Military Personnel"; The Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009; and E.O. 9397 (SSN), as amended.

Purpose(s): To improve the timeliness, efficacy, and transparency of the care, management, and transition of RSMs or eligible family members and caregivers receiving support (as defined in DoD Instruction 1300.24). Contact information is used by case managers to facilitate the uniformity and effectiveness of care and/or transition from active duty to temporary or permanent retirement for eligible individuals. These records are also used as a management tool for statistical analysis, tracking, reporting, evaluating program effectiveness and conducting research.

Routine Use(s): In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

Service member records are shared with the Department of Veterans Affairs (VA) as a checklist upon completion of the program with the DoD.

Law Enforcement Routine Use: If a system of records maintained by a DoD Component to carry out its functions indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature, and whether arising by general statute or by regulation, rule, or order issued pursuant thereto, the relevant records in the system of records may be referred, as a routine use, to the agency concerned, whether federal, state, local, or foreign, charged with the responsibility of investigating or prosecuting such violation or charged with enforcing or implementing the statute, rule, regulation, or order issued pursuant thereto.

Congressional Inquiries Disclosure Routine Use: Disclosure from a system of records maintained by a DoD Component may be made to a congressional office from the record of an individual in response to an inquiry from the congressional office made at the request of that individual.

Disclosure to the Department of Justice for Litigation Routine Use: A record from a system of records maintained by a DoD Component may be disclosed as a routine use to any component of the Department of Justice for the purpose of representing the Department of Defense, or any officer, employee or member of the Department in pending or potential litigation to which the record is pertinent.

Disclosure of Information to the National Archives and Records Administration Routine Use: A record from a system of records maintained by a DoD Component may be disclosed as a routine use to the National Archives and Records Administration for the purpose of records management inspections conducted under authority of 44 U.S.C. 2904 and 2906.

Data Breach Remediation Purposes Routine Use: A record from a system of records maintained by a Component may be disclosed to appropriate agencies, entities, and persons when (1) The Component suspects or has confirmed that the security or confidentiality of the information in the system of records has been compromised; (2) the Component has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or other systems or programs (whether maintained by the Component or another agency or entity) that rely upon the compromised information; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the Components efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.

Disclosure: Voluntary; however, failure to provide requested information may result in significant administrative delay(s) or the loss of services that might otherwise be available.

**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.	The Office of Warrior Care Policy
<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	The Departments of the Army, Navy, and Air Force; Special Operations Combatant Command (SOCOM)
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	The Department of Veterans Affairs (VA); The Department of Homeland Security (DHS) (USCG)
<input type="checkbox"/> 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.	Syneren Technologies - System Vendor and Developer Both contracts specify a Non-Disclosure Agreement (NDA) signed by all employees assigned to the contract to protect PII, Privacy Act Information and beneficiary's rights under HIPAA. No FARs are referenced in the contract but several DoD Directives and Regulations are: Namely; DoDM 6025.18; DoD 5400.11; DoDI 8500.01; and DoDM 5200.02-R.
<input type="checkbox"/> 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)

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

Existing DoD Information Systems: Defense Enrollment Eligibility Reporting System (DEERS)  
Other Federal Information Systems: Veterans Affairs (VA) Data Access Service (DAS); VA Federal Case Management Tool (FCMT)

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

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

Official Forms: DD Form 2948; DD Form 93; DD Form 214; DD Form 2860; DD Form 2870; DD Form 2656; AF Form 356; VA Form 10-0454.  
Website/E-Form: <https://rcpss.csd.disa.mil/rcpss/>.  
Information Sharing - System to System: DEERS; VA DAS; VA FCMT  
Other: DoD Secure Access File Exchange (SAFE).

**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.dod.mil/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?**

Mission Schedules:  
- DAA-0330-2015-0003-0001

(1) NARA Job Number or General Records Schedule Authority.

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: 1805-28

FILE TITLE: Recovery Coordination Program Support Solution (RCP-SS)

DISPOSITION: Temporary. Cut off annually, after the separation/retirement of the service member or termination/retirement of the civilian servant. Destroy 10 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 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.

Department of Defense Instruction (DoDI) 1300.24, "Recovery Coordination Program (RCP)"; National Defense Authorization Act (NDAA) for 2008, Sections 1611, 1614, and 1648; NDAA for 2013, Section 738; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 38 U.S.C. 523, Coordination and Promotion of Other Programs Affecting Veterans and their Dependents; DoDI 1332.35, "Transition Assistance Program for Military Personnel"; The Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009; 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.

As participation in the Recovery Coordination Program (RCP) is voluntary, ICPCCS is not subject to the Paperwork Reduction Act (PRA) per DoDM 8910.01, Volume 2, Enclosure 3, Section 8(a1).