

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:

Enterprise Noah

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

07/13/2026

Hearing Center of Excellence, Information Management Branch

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.

System Identification and Mission Support

The Enterprise Noah v4.x system is a clinical application manufactured by the Hearing Instrument Manufacturers Software Association (HIMSA) and utilized by the audiology community to perform hearing aid fittings, analyze audiograms, and conduct speech or loudness assessments. The system manages patient records in a centralized database, integrating HIMSA-certified modules that provide more sophisticated fitting, measurement, and management tools. These modules are Defense Health Agency (DHA) Cyber-approved and posted on the Approved Products List (APL). The Enterprise Noah environment is hosted at a DHA Compute and Storage Management Service (CSMS) datacenter to ensure data persistence and availability across Department of War (DoW) Military Treatment Facilities (MTFs).

PII/PHI Collection, Sources, and Operational Necessity

Enterprise Noah processes both Personally Identifiable Information (PII) and Protected Health Information (PHI) for uniformed services medical beneficiaries and Federal employees. The PII collected includes standard demographics and the Electronic Data Interchange Personal Identifier (EDIPI), the unique primary identifier for DoW personnel and beneficiaries. To support clinical configuration and analysis, the PHI collected, patient audiograms, are securely imported into Enterprise Noah via an internal interface with the Enterprise Clinical Audiology Application (ECAA), commercially known as AudBase.

To facilitate essential medical logistics, the system captures the Remote Order Entry System (ROES) Identification (ID), which consists of the last four digits of the patient's Social Security Number (SSN). This identifier is a mandatory requirement for the Department of Veterans Affairs (VA) ROES application. The ROES ID allows providers to place online orders for hearing aid products and services through the Denver Acquisition & Logistics Center (DALC), ensuring that healthcare items are accurately ordered, tracked, and shipped to the appropriate clinical site.

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 the verification and identification of patient data within the Enterprise Noah system. The intended use of the PII spans administrative functions, direct patient care, and clinical support. Additionally, with the collection of the ROES ID (the last four digits of the patient's SSN), the PII is used for critical mission-related and administrative medical logistics. This specific identifier is required to authenticate, order, track, and ship hearing aids and associated components through ROES and the DALC.

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 when they agree to an appointment or treatment/procedure. This

objection process is completed verbally with clinic staff and documented via required signatures on standard patient admission and privacy forms. If an individual chooses to object to the collection of specific PII, clinical staff will explain that the absence of necessary information (such as the ROES ID for VA logistics) may result in the inability to order prescribed medical devices or fully execute the intended treatment plan.

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.

Consent for the specific use of PII is obtained verbally and documented through required signatures on standard patient admission and privacy forms at the start of a clinical encounter. Individuals may provide consent for general healthcare services while withholding consent for specific data uses. For example, if a patient withholds consent for the collection of the ROES ID (last four digits of the SSN), the provider will remain able to conduct clinical assessments but will be unable to utilize ROES to order or track the patient's prescribed hearing aid devices.

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: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Ch. 55, Medical and Dental Care; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. 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 MTFs; DoD Manual 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs; and E.O. 9397 (SSN), as amended.

PURPOSE: Enterprise Noah v4.x is a system used by the audiology community to perform basic hearing aid fitting, analysis of audiograms, and speech or loudness tests. It has the capability to create journal entries in each patient record. Enterprise Noah is comprised of integrated tools, referred to herein as modules, developed and maintained by multiple suppliers within the HIMSA community. Patient data is stored in a central database and can be read by any of the approved and tested modules within the accredited Enterprise Noah system. Additionally, the system captures the ROES ID (last four digits of the patient's SSN) to facilitate the ordering, tracking, and shipping of prescribed hearing aids and related services through ROES.

ROUTINE USES: Information in your records may be disclosed to private physicians and Federal agencies, including the VA, Health and Human Services, and Homeland Security in connection with your medical care; other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and non-government third parties to recover the cost of healthcare provided to you by the Military Health System.

Any PHI in your records may be used and disclosed generally as permitted by the HIPAA Rules, as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

APPLICABLE SORN: EDHA 07, Military Health Information System (June 15, 2020; 85 FR 36190)
<https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNs/DHA/EDHA-07.pdf>

DISCLOSURE: Voluntary. If you choose not to provide the requested information, no penalty may be imposed; however, absence of the requested information may result in administrative delays, denial of specific healthcare services, or the inability to order and ship prescribed hearing aids and medical components.

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 MTFs

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

Specify.

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

Specify. VA

☐ 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.
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☐ Other (e.g., commercial providers, colleges).	Specify.
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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 | |

1. Defense Enrollment Eligibility Reporting System (DEERS) - (Source for initial EDIPI)

2. ECAA - (Source for audiograms and patient demographics)

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) | |

ECAA to Enterprise Noah Data Flow:

Enterprise Noah v4.x maintains a secure, one-way data interface to receive clinical data from ECAA, the system of record for audiometric testing. The interface utilizes a Hypertext Transfer Protocol Secure/Simple Object Access Protocol (HTTPS/SOAP) connection, and all data is encrypted in transit using Transport Layer Security (TLS) 1.2.

Upon completion of a hearing test in ECAA, a message containing the patient's demographic data (Name, Date of Birth, Address, and sex), EDIPI, and the completed audiogram is transmitted to Enterprise Noah. This transfer occurs entirely within the secure DHA Medical Community of Interest (Med-COI) network boundary. Enterprise Noah uses the inbound EDIPI to match the audiogram to the correct patient record, ensuring data integrity and eliminating manual entry. No data is transmitted back to ECAA from Enterprise Noah.

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 EDHA 07

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.

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:

- Unscheduled

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:

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

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.

Authority Type Citations

Statutory Authorities 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C.

Ch. 55, Medical and Dental Care; 10 U.S.C. 1079, 1086, 1095; 42 U.S.C.

290dd, 290dd-2; 42 U.S.C.

Ch. 117, Sections 11131-11152; Public Law 104-191 (HIPAA).

Executive Orders E.O. 9397 (SSN), as amended.

Regulatory & DoD Policy 45 CFR 164, Security and Privacy; DoDI 6015.23, Foreign Military Personnel Care; DoD Manual 6025.18,

Implementation of the HIPAA Privacy Rule in DoD Health Care Programs.

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 Paperwork Reduction Act (PRA) does not apply due to the collection's internal respondent population. Additionally, this internal collection is exempt under Paragraph 1.b. of Enclosure 3 in DoD Manual 8910.01, which governs exemptions for clinical and direct patient care information collections within military treatment facilities.