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:

Pharmacy Outpatient Automation Solution – iA (POAS-I)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

10/07/2026

Healthcare Operations, Pharmacy Operations Division

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.

POAS-I v3/v4 Workflow System is used to facilitate the dispensing of outpatient prescriptions to patients. It is used in the filling, checking/ verifying, and pick-up steps of prescription dispensing. POAS-I processes data received from MHS GENESIS and correlates the information from each of the source databases using a standard set of patient, provider, and other identifiers. POAS-I provides a standard clinical interface that allows viewing of a wide range of clinical information pertaining to a single patient or group of patients for the safe and efficient dispensing of prescriptions.

The Personally Identifiable Information (PII) collected includes: patient name, personal cell phone number, home mailing address, birth date, home telephone number, mobile telephone number, DoD ID, and the medication being subscribed. Images of prescriptions are also stored in lieu of hard copies. Categories of individuals includes: active-duty military (all services + Reserve), Coast Guard, National Guard, veterans, dependents, retirees and/or their dependents, contractors, foreign nationals.

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 processing, identification, tracking, authentication and verification of patient prescription medicines.

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.

POAS-I receives PII directly from MHS GENESIS; therefore, the opportunity to object is only available at the source system.

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.

POAS-I receives PII from MHS GENESIS; therefore, the opportunity to consent is only available at the source system.

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

You are accessing a U.S. Government (USG) Information System (IS) that is provided for USG-authorized official business only.
By using or accessing this IS, you understand and consent to the following:
1. You have no reasonable expectation of privacy regarding any communications or data transiting or stored on this system.
2. At any time, the USG or authorized personnel may monitor, intercept, record, and search any communication or data transiting or stored on this system.
3. Any communications or data transiting or stored on this system may be disclosed or used for any lawful government purpose.
Unauthorized or improper use of this system is prohibited and may result in disciplinary action, as well as civil and criminal penalties.

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 physicians, pharmacists, nurses, and billing/financial parties
☒ Other DoD Components *(i.e. Army, Navy, Air Force)*	Specify.	Air Force, Army, Navy, Marine physicians, pharmacists, and nurses; and may be shared with billing and financial groups within those Services.
☒ Other Federal Agencies *(i.e. Veteran's Affairs, Energy, State)*	Specify.	Department of Homeland Security, US Coast Guard physicians, pharmacists and nurses, and may be shared with billing and financial groups within the Department of Homeland Security, US Coast Guard
☐ 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.	iA support staff access POAS-I servers for maintenance, patching, and repair. Contractual language to safeguard PII and/or PHI includes: "Contractor shall comply with DoD Directive (DoDD) 5400.11; DoDD 8500.1; DoD Instruction 8500.2; DoD Manual 6025.18, and DoD 5200.2-R."
☒ Other *(e.g., commercial providers, colleges).*	Specify.	Civilian Health Care Providers

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

- ☐ Individuals
- ☒ Existing DoD Information Systems
- ☐ Other Federal Information Systems
- ☐ Databases
- ☐ Commercial Systems

MHS GENESIS

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

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

Paper prescriptions are scanned and stored in the system. The system is backed-up at regular intervals to prevent data loss.

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/

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.

Information is not being maintained within a System of Records where it is retrieved by the use of a unique identifier.

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

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: 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.
RM NOTE: Exported patient record information is maintained in the appropriate electronic health record system i.e. MHS Genesis.

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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 USC, Chapter 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; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD 6025.18-R, DoD Health Information Privacy Regulation

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.

OMB approval is not required as the information collected 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).