

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 Blood Management System (EBMS) - Donor

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: foreign nationals are included in general public.)

- | | |
|--|--|
| <input type="checkbox"/> From members of the general public | <input type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <input type="checkbox"/> Not Collected (if checked proceed to Section 4) |

b. The PII is in a: (Check one)

- | | |
|--|---|
| <input type="checkbox"/> New DoD Information System | <input type="checkbox"/> New Electronic Collection |
| <input checked="" type="checkbox"/> Existing DoD Information System | <input type="checkbox"/> Existing Electronic Collection |
| <input type="checkbox"/> 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 purpose of the Enterprise Blood Management System (EBMS)-Donor, formerly known as Blood Donor Management System (BDMS), is to manage the blood donation aspect of the Armed Services Blood Program (ASBP), including blood donor registration, screening, blood products, and associated record keeping for military blood donors, dependents of military donors, and other civilian donors in the Continental United States (CONUS), Outside Continental United States (OCONUS), and in Theater. EBMS-Donor is a Commercial off the Shelf (COTS) product manufactured by Mediware Information Systems, Inc. and is FDA Class II regulated. EBMS-Donor replaced the Defense Blood Standard System (DBSS).

EBMS-Donor is accessible by authorized users (i.e., government civilians, military and contractors) from 20 DHA Military Treatment Facilities (MTFs) (Army, Navy, and Air Force). The system hosts a web application that is restricted to authorized users, but is not accessible by the public. Data Base Administrators (DBAs) are individuals who have access to the database that contains the PII/PHI of blood donors. The Data Management Team handle the initial data load of current PII/PHI from the legacy DBSS.

The types of personal information collected in EBMS-Donor includes home/cell phone, personal email, gender, Date of Birth, names, Social Security Number, ID numbers, ethnicity, health, race and employment information. The groups represented in the system for which PII/PHI is collected are Service members, Department of Defense (DoD) beneficiaries, Department of Veteran Affairs (VA) patients, civilian patients, and foreign nationals.

EBMS-Donor is owned and managed by the Electronic Health Record (EHR) Core Program Management Office (PMO) under the executive management of Defense Health Agency (DHA), Health Information Technology (HIT/J6), Solution Delivery Division (SDD).

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 used to identify and verify donor demographics in determining donor suitability and used to associate donors to blood collections for the purposes of testing and look-back implications. A look-back is a search of records to identify and notify all recipients of potential or known infectious blood units so that they may be counseled and receive further testing or evaluation.

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.

If an individual objects to the collection of their PII/PHI at the time of blood donation, he or she will not be able to donate blood if PII/PHI is not provided.

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.

According to Operational procedures for the Armed Services Blood Program Elements (TM 8-227-11). The ASBP-572, formerly the DD Form 572 (Blood Donation Record), must be completed. It explains the use of the individual's PII and includes a Privacy Act Statement and Statement of Consent. This is printed out and the donor signs giving consent. If consent is not provided, blood donation cannot be collected.

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 statement serves to inform you of the purpose for collecting personal information required by EBMS-D and how it will be used.

AUTHORITY: 10 U.S.C. 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to verify donor suitability. Additionally, information will be used to associate donors with blood collections for the purposes of testing, as well as for the ability to notify donors and recipients of potential or known compromised or infected blood units.

ROUTINE USES: 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)). Collected information may also be shared with entities including the Departments of Health and Human Services, Veterans Affairs, and other Federal, State, local, or foreign government agencies, or authorized private business entities.

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 for this system, refer to the applicable SORN.

APPLICABLE SORN: EDHA 25 DoD, Enterprise Blood Management System, is the applicable SORN for this system.
<http://dpcl.dod.mil/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570765/edha-25-dod/>

DISCLOSURE: Voluntary. If you choose not to provide your information, no penalty may be imposed, but absence of the requested information will result in the inability to accept donation.

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component? (Check all that apply)

Within the DoD Component

Specify.

Defense Health Agency (DHA) MTF Occupational Health Departments (in order to disclose to military personnel test results) and MTF Public Health Departments

Other DoD Components

Specify.

Army, Navy, and Air Force MTF Occupational Health Departments (in order to disclose to military personnel test results) and MTF Public Health Departments

Other Federal Agencies

Specify.

State and Local Agencies

Specify.

-Planned Systems International (PSI), Inc.
-Mediware Information Systems, Inc.

The following language is contained in all contracts and sub-contracts awarded by the government: "The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with DFAR Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," October 29, 2014, and DoD 5400.11-R, "DoD Privacy Program," May 14, 2007. The contractor shall also comply with federal laws relating to freedom of information and records management.

Specify.

Under DoD 6025.18-R, "DoD Health Information Privacy Program," January 24, 2003, reasonable steps must be taken to implement appropriate procedural, administrative, technical and physical safeguards to prevent the unauthorized use and/or disclosure of any personally identifiable information (PII) or PHI. Likewise, all uses, disclosures, and destruction of PII and PHI data are generally subject to DoD 5400.11-R, "DoD Privacy Program," May 14, 2007 and DoDI 8580.02, "DoD Security of Individually Identifiable Health Information in DoD Health Care Programs" August 12, 2015."

The vendors have entered into a Business Associate Agreement with DHA and have a current Data Sharing Agreement (DSA).

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.)



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 type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

PII for EBMS-Donor is collected face-to-face from individuals providing blood at the time of the blood donation.

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

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

Face-to-Face Contact – Upon completion of Uniform Donor History Questionnaire (UDHQ), a blood donor staff member reviews information. Depending on the potential donor’s answers to questionnaire, a follow-up interview may be required to determine eligibility for donation.

Web Site – Individuals generally input data directly into the off-line EBMS-Donor web application via an off-line laptop client. The form fields in the web application are the same as ASBP-572

Paper Format – The paper form is only used when the EBMS-Donor web application is temporarily not in service.

EBMS-Donor URLs:

https://lifetrak.mhsi.health.mil/Itagentapp/donor_login

https://lifetrak.mhsi.health.mil/Itagentapp/lab_login

Access to URLs are not available to the general public.

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.

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.

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

(3) Retention Instructions.

Retention and Disposition: Final disposition - Temporary; Cut off annually; Destroy 10 years after cut off

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.

10 U.S.C., Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 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.

Currently pending renewal

