

## 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:**

Workload Management System for Nursing-Internet (WMSN<sub>i</sub>)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/08/2022

### 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 purpose of the WMSN<sub>i</sub> system is to determine the nursing manpower requirements based upon patient care needs. The patient acuity data is collected to analyze nurse personnel requirements to meet the clinical needs of Active Service members, their families, retirees and other DoD personnel and dependents. WMSN<sub>i</sub> determines how many staff members are needed on a particular nursing unit to provide care during a 24-hour period. The resulting nursing manpower requirements are then documented in a table of distribution and allowances for use at the US Army Medical Command and its Medical Treatment Facilities (MTFs). Along with US Army MEDCOM and its MTFs, WMSN<sub>i</sub> is also being utilized at Walter Reed National Military Medical Center (WRNMMC), which is under the control of the Defense Health Agency (DHA).

WMSN<sub>i</sub> collects the following PII: name, gender, birth date, spouse information, child information (Labor & Delivery patients), other ID number, and medical information/ Protected Health Information (PHI).

WMSN<sub>i</sub> is owned and managed by the Clinical Support Program Management Office (PMO) under the executive management of Defense Health Agency (DHA), DAD IO, Solution Delivery Division (SDD). The information is used by Office of Personnel Management (OPM) for decision making regarding the number of nursing positions in inpatient military treatment facilities.

**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)

The PII is collected for identification and verification purposes, to match individuals with their related records and reports. The intended use of the PII collected is for mission-related and administrative purposes in the nursing manpower determination process.

**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.

WMSN<sub>i</sub> is not the initial point of collection of PII, therefore, individuals cannot object to the collection of their PII.

**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.

WMSN<sub>i</sub> is not the initial point of PII collection; therefore, individuals cannot consent to specific uses of their PII.

**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 WMNSi does not collect PII directly from individuals. Therefore, no Privacy Act Statement or Privacy Advisory is required.

**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.                      Walter Reed National Military Medical Center (WRNMMC) to determine nurse end strength.
  - Other DoD Components (i.e. Army, Navy, Air Force)                      Specify.                      Office of The Surgeon General (U.S Army), U.S. Army Medical Command (MEDCOM) Headquarters.
  - Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)                      Specify.                      Office of Personnel Management (OPM)
  - 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.                      According to contract HT0015-19-C-0002, Performance Work Statement, para. 1.4.13, BIF Technologies, the contractor that provides the Application Manager for this system, is contractually obligated to adhere to safeguarding PII. Para 1.10 reads as follows, "In accordance with DOD 6025.18-R "Department of Defense Health Information Privacy Regulation," January 24, 2003, the Contractor meets the definition of Business Associate. Therefore, a Business Associate Agreement is required to comply with both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security regulations. This clause serves as that agreement whereby the Contractor agrees to abide by all applicable HIPAA Privacy and Security requirements regarding health information as defined in this clause, and in DOD 6025.18-R and DOD 8580.02-R."
- 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)

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

The Composite Health Care System is the source of the PII collected.

**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)

**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.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.

**I. 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.            **Unscheduled**

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

(3) Retention Instructions.

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

**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.

5 U.S.C. § 301, Departmental Regulations; 10 U.S.C. § 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. Chapter 55, Medical and Dental Care; Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 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 Military Treatment Facilities (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.

**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 in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections." The Workload Management System for Nursing-Internet (WMSN-i) captures inpatient and outpatient workload and provide staff scheduling in a centralized location. This does not constitute a collect information pursuant the Paperwork Reduction Act of 1995.