

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:

Anatomic Pathology Laboratory Information System (APLIS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

02/24/23

Defense Healthcare Management System Modernization (DHMSM) Project Management Office (PMO)

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.

Anatomic Pathology Laboratory Information System (APLIS) is the program name for the Anatomic Pathology (AP) functionality managed by the DoD Healthcare Management System Modernization (DHMSM). CoPath Plus is the AP application utilized by APLIS. APLIS is an advanced pathology information management system for storing/reporting anatomic pathology information that accommodates the clinical disciplines of surgical pathology, cytology, histology, and autopsy. Additionally, electronic health records and diagnoses are tracked as a part of the APLIS program. APLIS has bi-directional communication with CHCS, MHS Genesis, and Defense Healthcare Management Systems (DHMS). For APLIS, interfaces are where the source ePHI is received and subsequently returned following input provided by the AP labs using utilizing CoPath Plus.

The Personally Identifiable Information (PII) APLIS receives from system-to-system connections are: Social Security Number (SSN), contact information, personal descriptors, DOD ID number, Medical Record Number (MRN), military information, demographic information, Protected Health Information (PHI), and medical information. The information collected may pertain to dependents, retirees and/or their dependents, active duty, contractor, foreign nationals, former spouses, reservists, and national guard personnel.

The Anatomic Pathology Laboratory Information System (APLIS) is owned and operated by Defense Healthcare Management System Modernization (DHMSM) Project Management Office (PMO).

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 intended use of the PII is to maintain and reference accurate patient information and diagnoses, electronic health record information that is tracked for mission-related use, identification, verification, and data matching.

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.

APLIS is not the initial point of collection for PII. APLIS collects all PII downstream from system-to-system connections, therefore individuals are not able to 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.

APLIS is not the initial point of collection for PII. The opportunity to consent is only available at the information collection source system.

As such individuals do not have the opportunity to provide consent to the 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

APLIS will not collect any personally identifiable information (PII) from individuals to be stored in a system of records and retrieved by a personal identifier. Therefore, the Privacy Act does not apply to this system, no Privacy Act Statement or Advisory is necessary.

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. | <input type="text" value="DHA Military Treatment Facilities (MTF)s"/> |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | <input type="text"/> |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | <input type="text"/> |
| <input type="checkbox"/> State and Local Agencies | Specify. | <input type="text"/> |



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.

Cerner Corporation will support the application that stores the PHI and PII that is used across the active DoD Anatomic Pathology Community across 7 MAAG Domains and interfaces with the legacy CHCS EHR and modernized EHR - MHS GENESIS. Cerner associates providing support will not use APLIS data beyond the scope of the awarded applicable APLIS PWS contract(s). Cerner Corporation has a Data Sharing Agreement (DSA# 19-2268) for the APLIS Sustainment contract.

Below is the language that Cerner Corporation associates will comply to protect this sensitive information:
 "The Contractor shall comply with DOD Directive 8500.1, "Information Assurance (IA)," DOD Instruction 8500.2, "Information Assurance (IA) Implementation," DOD Directive 5400.11, "DOD Privacy Program," DOD 6025.18-R, "DOD Health Information Privacy Regulation," and DOD 5200.2-R, "Personnel Security Program Requirements." The Contractor responsibilities for ensuring personnel security include, but are not limited to, meeting the following requirements:

- Follow the Privacy Office guidelines for submittal of Automated Data Processor/Information Technology (ADP/IT) security clearances and ensure all Contractor personnel are designated as ADP/IT-I, ADP/IT-II, or ADP/IT-III where their duties meet the criteria of the position sensitivity designations. Contact the Privacy Office for guidance on the appropriate ADP/IT levels for personnel on the contract.
- Initiate, maintain, and document personnel security investigations appropriate to the individual's responsibilities and required access to MHS Sensitive Information (SI).
- Immediately report to the Privacy Office and deny access to any automated information system (AIS), network, or MHS SI information if a Contractor employee filling a sensitive position receives an unfavorable adjudication, if information that would result in an unfavorable adjudication becomes available to do so by the appropriate Government representative for security reasons.
- Ensure that all contractor personnel receive IA training before being granted access to DOD AISs/networks, and/or MHS SI information.

The Contractor shall ensure that all individuals requiring access to sensitive information are processed for access authorization in accordance with DOD personnel security policies. The Contractor shall ensure that all authorized users maintain the appropriate ADP/IT category classification for a position of public trust specific to their role. The Contractor shall ensure that only individuals who have a valid need-to-know that is demonstrated by assigned official Government duties and who satisfy all personnel security criteria (e.g., IT position sensitivity background investigation requirements outlined in DOD 5200.2-R) are granted access to information with special protection measures or restricted distribution as established by SDD.



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

Defense Healthcare Management Systems (DHMS)
Military Health System Genesis (MHS Genesis)
Composite Health Care System (CHCS)

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 type="checkbox"/> In-Person Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input type="checkbox"/> Telephone Interview |
| <input checked="" type="checkbox"/> Information Sharing - System to System | <input type="checkbox"/> Website/E-Form |
| <input type="checkbox"/> 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

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.

APLIS will not collect any personally identifiable information (PII) from individuals to be stored in a system of records and retrieved by a personal identifier. Therefore, no SORN is necessary. However, APLIS will collect PII directly from other DoD information systems, and the system owners should monitor the SORN compliance posture of those source systems.

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.

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.

10 U.S.C. Chapter 55, Medical and Dental Care; 32 C.F.R. 199.17 TRICARE Program; DoDI 6015.23, Delivery of Healthcare at Military Treatment Facilities; DoDI 6025.13, Medical Quality Assurance (MQA) and Clinical Quality Management in the Military Health System (MHS); 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.

Per DoD Manual 8910.01, Volume 2 this information system is not considered a public information collection because it includes facts or opinions, obtained initially or in follow-up requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on, or prophylaxis to prevent, a clinical disorder; direct treatment of that disorder; or the interpretation of biological analyses of body fluids, tissues, or other specimens; or the identification or classification of such specimens. This includes medical records established as a result of this type of action.