

## 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:**

Defense Occupational and Environmental Health Readiness System - Industrial Hygiene (DOEHRS-IH)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

08/22/23

Program Executive Office (PEO) Medical Systems (J-6)

### 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 Defense Occupational and Environmental Health Readiness System - Industrial Hygiene (DOEHRS-IH) is a data collecting, reporting and analytical system that allows the Department of Defense (DoD) to manage occupational and environmental health (OEH) risk data and actively track biological, chemical, and physical health hazards. DOEHRS-IH also captures workplace practices and protection equipment usage in support of military operations worldwide. DOEHRS-IH supports OEH, public health, and medical inspections, as well as health risk management. DOEHRS-IH data is provided to aide in medical treatment, occupational and environmental illness evaluations, disability determinations, and claims adjudication. DOEHRS-IH is fully deployed to the Army, Navy, and Air Force and provides OEH professionals with the ability to collect and analyze threat exposures as a result of actual or perceived natural disasters, hazardous material releases, chemical/biological/nuclear accidents which may affect DoD-affiliated personnel. In the future, DOEHRS-IH may also cover members of the general public (e.g., civilians unaffiliated with the DoD or other Federal Agency) in an area of perceived or actual occupational, environmental, or public health incident upon the direction of the Under Secretary of Defense for Personnel and Readiness (USD[P&R]). Non-DoD-affiliated members of the general public must consent to be included in DOEHRS-IH. Of special note, DOEHRS-IH is also the foundational system for the Individual Longitudinal Exposure Record (ILER), which is a DoD-led initiative developed in collaboration with the Veterans Affairs (VA) to create a complete record of DoD military and civilian employee OEH exposures over the course of their careers.

DOEHRS-IH interfaces with the Defense Manpower Data Center (DMDC). DMDC maintains the archive of personnel, manpower, training, and financial data for the DoD. The communication between DOEHRS-IH and DMDC is bidirectional over a virtual private network (VPN) connection, which is initiated by DOEHRS-IH. DOEHRS-IH retrieves personnel information from DMDC using a site-to-site VPN provided by DMDC's Authentication Data Repository Access Data Warehouse (ADR-ADW) system. ADR-ADW is located at DMDC's computer site. DOEHRS-IH ILER will be collecting a one time data set from DMDC/Contingency Tracking System (CTS) to include non-classified deployment information (2001 to 2018) for DoD personnel.

DOEHRS-IH covers individuals who fit into the following categories: Members of the Armed Forces; DoD-affiliated personnel, including civilian, uniformed personnel, contractor, and foreign national employees. Spouses, dependents, and beneficiaries of members of the Armed Forces and DoD-affiliated personnel are also included if said individual is in the area of a potential or actual occupational, environmental, or public health event. In the future, DOEHRS-IH may cover members of the general public (e.g., civilians unaffiliated with the DoD or other Federal Agency) upon the direction of the USD(P&R) living or working in areas requiring longitudinal data related to occupational, environmental, and/or public health events.

Personally identifiable information (PII) collected by DOEHRS-IH includes, but is not limited to, personal descriptors, medical records, event based information, demographic information, and contact information.

DOEHRS-IH is managed by the Clinical Support Program Management Office (CSPMO)/Solution Delivery Division (SDD)/Program Executive Office (PEO) Medical Systems (J-6)/Defense Health Agency (DHA).

**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 by DOEHRs-IH to establish a database of longitudinal exposure and risk information for record keeping and reporting in the support of OEH, public health, and medical inspections as well as health risk management, and to complete the collection and analysis of threat exposures for designated areas as a result of actual or perceived natural disasters, hazardous material releases, or chemical/biological/nuclear accidents. The intended use of this PII is to support medical treatment, occupational and environmental illness evaluations, disability determinations, and claims adjudication, and to provide requested information to ILER.

**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.

Submission of requested information is voluntary. Individuals are informed of the specific uses of the PII being collected and may object to the collection of their PII, either verbally or in writing, based on the procedures in place at the local facility where the data is collected and maintained. However, individuals who choose not to provide the requested information may face administrative delay(s) and/or relinquishment of currently assigned duties.

**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.

Submission of requested information is voluntary. Individuals are informed of the specific uses of the PII being collected and may consent to specific uses of their PII, either verbally or in writing, based on the procedures in place at the local facility where the data is collected and maintained. However, individuals who choose not to provide the requested information may face administrative delay(s) and/or relinquishment of currently assigned duties.

**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:** 10 U.S.C. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; and E.O. 9397 (SSN), as amended.

**PURPOSE:** Defense Occupational and Environment Health Readiness System – Industrial Hygiene (“DOEHRS-IH”) collects your data regarding exposure to occupational health hazards for record keeping, health surveillance, treatment, and other purposes. It allows DoD to manage occupational and environmental health risk data and track various health hazards.

**ROUTINE USES:** These records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows: to Federal Agencies, including the Departments of Veterans Affairs (“VA”) and Labor and Social Security Administration related to disability and other pending claims as well as to the VA, other Federal Agencies, and private physicians related to an individual’s medical care; to the Department of Health and Human Services, the Occupational Health and Safety Administration, and other federal agencies for compliance purposes; to organizations conducting Institutional Review Board reviewed health-related research. The DOD Blanket Routine Uses at the beginning of the Office of the Secretary of Defense compilation of records notices apply to this system. For a full listing of the Routine Uses, please refer to the applicable SORN.

Any protected health information (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 19, Defense Occupational & Environmental Health Readiness System – Industrial Hygiene (DOEHRS-IH) (November 18, 2013, 78 FR 69076). <https://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570682/edha-19/>

**DISCLOSURE:** Voluntary. If you choose not to provide the requested information, there may be an administrative delay and relinquishment

of your assigned duties; however, no penalty may be imposed.

**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.

Industrial Hygiene, Environmental Health, Radiation Health and Public Health Professionals, Medical Treatment Facility (MTF) Industrial Site Commanders, Lead Agents, and Installation Agencies

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

Specify.

The Departments of the Army, Navy, and Air Force, The Defense Manpower Data Center (DMDC)

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

Specify.

The Department of Labor; The Department of Veterans Affairs; Occupational Safety and Health Administration

State and Local Agencies

Specify.

Contractors:

- American Systems Corporation with subcontractors Business Enabled Acquisition & Technology (BEAT, LLC), Planned Systems International (PSI), Techworks, LLC, and Aderas, Inc. provides sustainment and development support for DOEHRS-IH on the CSPMO Surveillance and Readiness (S&R) Portfolio Support and Enhancements  
- Concept Plus provides sustainment and development support for ILER

DOEHRS-IH Contractors have access to PII in the performance of specific contract tasks. Additionally, some DOEHRS-IH users are contractors; however, they are supervised by their Unit Services Administrator.

Contractors maintain DOEHRS-IH data by accessing database servers hosted by the Defense Information Systems Agency (DISA).

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.

DOEHRS-IH contractors are required to sign the DHA CONTRACTOR NON-DISCLOSURE AGREEMENT (NDA), Revised February 12, 2014. As used in this Agreement, sensitive information is an overarching term that also includes, but is not limited to, sensitive but unclassified information/data, Protected Health Information, For Official Use Only information/data, and Privacy Information.

DOEHRS-IH contractors are also required to sign a Data User Agreement (DUA).

The DOEHRS-IH Contract incorporates DHA Procedures, Guidance, and Information (PGI) 224.1-90 - DHA's processes for compliance with the requirements set forth in Federal Acquisition Regulation (FAR) Part 24, and includes a statement that reads: "The Contractor shall comply with DoDI 6025.18 "HIPAA Privacy Rule Compliance in DoD Health Care Programs", dated March 13, 2019."

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

Existing DoD Information Systems: Defense Manpower Data Center's (DMDC) Authentication Data Repository Access Data Warehouse

(ADR-ADW) system; DMDC's Contingency Tracking System (CTS) (one time data set)

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

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

DOEHRS-IH is accessible by authorized, registered users from the Internet at <https://doehrs-ih.csd.disa.mil>. DOEHRS-IH interfaces obtain PII from DMDC Defense Enrollment Eligibility Reporting System (DEERS).

DOEHRS-ILER is accessible by authorized/registered users at <https://ILER-Test.csd.disa.mil>. The one-time data set from DMDC/CTS will be via encrypted electronic data transfer.

**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 19

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.      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.

10 U.S.C. 133, Under Secretary of Defense for Acquisition, Technology, and Logistics; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C Chapter 55, Medical and Dental Care; 29 U.S.C 651, Congressional Statement of Findings and

Declaration of Purpose and Policy; DoDD 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoDI 6055.1, DoD Safety and Occupational Health (SOH) Program; DoDI 6055.05, Occupational and Environmental Health (OEH); DoDI 6055.17, DoD Installation Emergency Management (IEM) Program; DoDI 6200.03, Public Health Emergency Management Within the Department of Defense; 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.

DOEHRS-IH does not require OMB approval since it does not routinely collect information from members of the general public. DOEHRs-IH collects information from Members of the Armed Forces and DoD-affiliated personnel who live or work in areas requiring longitudinal data related to occupational, environmental, or public health. Public collection, such as from spouses and dependents of members of the Armed Forces and DoD-affiliated personnel, could be included if such spouse or dependent is in the area of a perceived or actual occupational, environmental, or public health event. These situations are uncommon and not subject to the Paperwork Reduction Act.