

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:

MHS GENESIS - Garrison

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

4/1/2024

Defense Healthcare Management System Modernization (DHMSM) Program Management Office

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 Military Health System (MHS) GENESIS Garrison (MHSG2) system is the core component of the MHS used at the Military Treatment Facilities (MTF) to enhance performance by facilitating network connectivity, ensure continuity of operations and facilitate medical device connectivity. MHSG2 is the authoritative source of clinical data to support improved population health, patient safety, and quality of care to maximize medical readiness for the Department of Defense (DoD).

MHSG2 is an Oracle Cerner Enterprise is an Electronic Health Record (EHR) information system that collects, processes, and distributes EHR longitudinally across the MHS, Department of Veterans Affairs (VA), United States Coast Guard (USCG), TRICARE network of service providers, and other Federal agencies for approximately 9.6 million DoD active duty personnel and their dependents.

MHSG2 collects, processes, and distributes Personally Identifiable Information (PII), including Protected Health Information (PHI): personal descriptors, Identification (ID) numbers, health information, personal contact information, and employment contact information. These categories of PII are collected from DoD, VA, and USCG beneficiaries and their dependents for the timely and high quality delivery of health care services, the determination and processing of patient benefit information for DoD, VA, USCG, and other beneficiaries, as well as for Defense Health Agency (DHA) authorized clinical trials, medical research, and disease registries.

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 patient identification, verification, and authentication in the course of scheduling and administering medical treatment, and for data matching when interfacing and sharing data with external medical and healthcare provider systems, and for proper claims processing by insurance companies. A limited subset of PII is provided to external commercial healthcare and insurance providers to support the provisioning of healthcare services.

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.

Individual are provided the opportunity to object by not signing the forms DD Forms 2870 and 2871, or by filing a compliant with the local MTF Privacy Office, or in writing with the Privacy and Civil Liberties Office (PCLO). If an individual chooses not to provide their information, comprehensive health care services may not be possible, the individual may experience administrative delays, may be rejected for service or assignment, however, medical care will not be denied.

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.

At the MTF, individuals consent to the specific uses of their PII by submitting DD Form 2870 and request restrictions on the use of the PHI by submitting DD Form 2871.

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 USC 8111, Sharing of Department of VA and DoD Healthcare Resources; 10 USC 1104, Sharing of Healthcare Resources with the Department of Veterans Affairs; 38 USC 8111, Sharing of Department Veterans Affairs and Department of Defense Health Care Resources; National Defense Authorization Act (NDAA) 2017, Defense Health Programs; 10 USC 136, Under Secretary of Defense for Personnel and Readiness; 10 USC Chapter 55, Medical and Dental Care; 42 USC Chapter 32, Third Party Liability for Hospital and Medical Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoD Instruction 6025.18, Privacy of Individually Identifiable Health Information in DoD Health Care Programs; DoD Regulation 6025.18-R, DoD Health Information Privacy Regulation; DoD Instruction 6040.45, DoD Health Record Life Cycle Management; DoD Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information required to provide and document your medical care; determine your eligibility for benefits and entitlements; adjudicate claims; determine third party responsibility for the cost of Military Health System (MHS) provided healthcare and recover that cost; evaluate your fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard; evaluate the MHS and its programs; and perform administrative tasks related to MHS operations and personnel readiness.

ROUTINE USES: Information in your records may be disclosed to: Private physicians and Federal agencies, including the Department of Veterans Affairs, Health and Human Services, and Homeland Security (with regard to members of the Coast Guard), in connection with your medical care; Government agencies to determine your eligibility for benefits and entitlements; Government and non-government third parties to recover the cost of MHS provided care; Public health authorities to document and review occupational and environmental exposure data; and Government and non-government organizations to perform DoD approved research. Information in your records may be used for other lawful reasons which may include teaching, compiling statistical data, and evaluating the care rendered. Use and disclosure of your records outside of DoD may also occur in accordance with 5 USC 552a(b) of the Privacy Act of 1974, as amended.

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 by DoD 6025.18-R. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

DISCLOSURE: Voluntary. Failure to provide the requested information, comprehensive health care services may not be possible, you may experience administrative delays, and you may be rejected for service or an assignment. However, care will not be denied.

APPLICABLE SORN: EDHA 07, Military Health Information System (June 15, 2020, 85 FR 36190)
<https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNS/DHA/EDHA-07.pdf>

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.

DHMSM PMO, Joint Operational Medicine Information System (JOMIS), and Enterprise Intelligence and Data Solutions (EIDS)

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

Specify.

Army, Navy, and Air Force MTFs

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

Specify.

VA, Department of Health and Human Services (HHS), Social Social Administration (SSA), and USCG within the US Department of Homeland Security (HS)

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.

Leidos Partnership for Defense Health (LPDH). The contract Performance Work Statement (PWS) paragraph 5.1.10.12 and sub-paragraphs serve as required Business Associate Agreement (BAA). The following language is contained in the contract per Defense Federal Acquisition Regulation (DFAR) Supplement, Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," May 8, 2007, and DoD 5400.11-R, "DoD Privacy Program," May 14, 2007. Personally Identifiable Information (PII) and Protected Health Information (PHI) - 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, per DFAR Supplement, Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," May 8, 2007, 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.

PII is shared with systems hosted on Amazon Web Services (AWS), however, AWS does not have access to the encrypted data stored on its cloud services. AWS is an accredited cloud service provider per FedRAMP and DoD Cloud SRG guidance, and is subject to DFARS Case 2013-D018 directly under DoD guidance via their DISA provisional authorization.

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

Existing DoD Systems: DHMSM EHR; legacy EHR systems Armed Forces Health Longitudinal Technology Application (AHLTA); Composite Health Care System (CHCS), Defensive Medical Information Exchange (DMIX) and Theater Medical Data Store (TMDS)
Other Federal Information Systems: VA EHR system, Veterans Health Information Systems and Technology Architecture (Vista); Medicare and Medicaid benefits information systems within HHS; Social Security Administration (SSA) Death Master File (DMF) system
Commercial Systems: Patient statements and insurance claim data include RevSpring, SSI Group, Experian, and Alpha II.

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 checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input checked="" type="checkbox"/> In-Person Contact | <input type="checkbox"/> Paper |
| <input type="checkbox"/> Fax | <input checked="" type="checkbox"/> 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) | |

Patient information is also collected via MHS GENESIS Patient Portal web site < <https://patientportal.mhsgenesis.health.mil> >
Forms used: DD2870 Request for Release of Information; DD2569 Third Party Collections OHI; OF522 Informed Consent; Notice of Privacy Practices

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.

MHS GENESIS - Garrison will follow the same retention policy as MHS GENESIS. MHS Genesis records are under moratorium, and all disposal activities must be postponed until lifted.

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 USC 8111, Sharing of Department of VA and DoD Healthcare Resources; 10 USC 1104, Sharing of Healthcare Resources with the Department of Veterans Affairs; 38 USC 8111, Sharing of Department Veterans Affairs and Department of Defense Health Care Resources; National Defense Authorization Act (NDAA) 2017, Defense Health Programs; 10 USC 136, Under Secretary of Defense for Personnel and Readiness; 10 USC Chapter 55, Medical and Dental Care; 42 USC Chapter 32, Third Party Liability for Hospital and Medical Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoD Instruction 6025.18, Privacy of Individually Identifiable Health Information in DoD Health Care Programs; DoD 6025.18-R, DoD Health Information Privacy Regulation; DoD Instruction 6040.45, DoD Health Record Life Cycle Management; DoD Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); 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 Collection Title: MHS GENESIS Patient Registration Module & Patient Portal; Control # 0720-0064; Expiration Date: 10.31.22