

## 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:**

Healthcare Artifact and Image Management Solution (HAIMS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

04/05/24

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.)

- |   |  |
|---|--|
| <input type="checkbox"/> From members of the general public                                       | <input type="checkbox"/> From Federal employees                          |
| <input checked="" type="checkbox"/> from both members of the general public and Federal employees | <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 HAIMS System (also referred to as the Enterprise Information Management (EIM) Platform) is a platform as a service that offers a comprehensive ECM/BPM solution for Military Treatment Facilities, enabling clinical and business administrative workflows such as patient record content management, paper records tracking, disability evaluation support, service treatment record processing, special needs management, and centralized electronic repository capabilities with several enterprise interface partners.

Workflow Applications:

Under the HAIMS system, the solution incorporates various workflow applications to provide its content-sharing and management capabilities to essential functional communities supported by the Defense Health Agency:

1. Health Artifact & Image Management Solution (HAIMS) Workflow Application:

- Supports Military Treatment Facility (MTF) functional requirements
- Displays health artifacts, images, and patient record demographics for clinical use and records management
- Enables efficient patient record searches

2. Paper Records Tracking (PRT):

- Supports record transfers between military hospitals and clinics
- Facilitates borrowing of records by clinician staff
- Manages retirement of records based on National Archives and Records Administration (NARA) disposition requirements

3. Joint Disability Evaluation System (JDES) Application:

- Provides case management, tracking, reporting, and electronic information sharing capabilities
- Enhances visibility of Disability Evaluation System (DES) procedures for processors, command teams, and uniformed service members

4. Service Treatment Record (STR) Processing Operations Reporting Tracking Solution (SPORTS):

- Enables the assembly, tracking, and monitoring of STR aggregation
- Concurrently automates collection activities to improve STR collection times

5. Federal Information Lifecycle Electronic Repository (FILER):

- Centralized online repository for all non-patient records affiliated with the DHA
- Facilitates processing and oversight of non-patient records in accordance with NARA and DoD automated records keeping standards

6. HAIMS Records Management:

- Supports Health Affairs/DHA components in proper maintenance, use, and disposition of paper and electronic records
- Adheres to federal laws, regulations, and DOD guidance on protecting sensitive information

7. SNPMIS (Special Needs Program Management Information System) Application:

- Manages early intervention services for eligible infants, toddlers, and school-aged children in Department of Defense Education Activity schools
- Critical for readiness decisions during service member relocations and deployments, impacting the health of family members with special needs

The categories of individuals that the HAIMS system provides functional support to are Military / Civilian employees and approved contractors that support clinical, administrative, research, and healthcare workflows and business process units.

The PII / PHI elements collected in the HAIMS system support the records management and identification of DODID's, Names, Addresses, Phone Numbers, SSN's, email addresses, Medical Record information, treatment plans, and any other approved health related data in compliance with HIPAA (See Sect. 2 / SSNJ Memo)

HAIMS is managed by the Care & Benefits Integrated Systems (CBIS) Program Management Office (PMO)/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)

The HAIMS Platform collects PII/PHI for mission-related and administrative use. The intended use of collected PII/PHI is to display health artifacts, images, and patient record demographics for clinical use and records management. PII/PHI is also used to complete patient searches, which allows the user to look up patient records.

**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.

Individuals do not have the opportunity to object to the collection of their PII as the HAIMS Platform does not serve as the initial point of collection.

**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.

Individuals do not have the opportunity to consent to the specific uses of their PII as the HAIMS Platform does not serve as the initial point of collection.

**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

**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 type="checkbox"/> Within the DoD Component  | Specify. | <input type="text"/>   |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)              | Specify. | The Departments of the Army, Navy, and Air Force.  |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | The Department of Health and Human Services (HHS), Department of Homeland Security (DHS), Department of Veterans Affairs (VA), |
| <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.

Contract contains Business Associate Agreement (BAA) which states: "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, as amended." Furthermore, the BAA states: "The Contractor agrees to use administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic protected health information that it creates, receives, maintains, or transmits in the execution of this Contract." In addition, the The Contractor shall also comply and become familiar with the following FAR Clauses as part of their training: 52.224-1 Privacy Act Notification and 52-224-2 Privacy Act.

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: Armed Forces Health Longitudinal Technology Application (AHLTA); Armed Forces Medical Examiner Tracking Solution (AFMETS); Health Readiness Records (HRR); Enterprise Clinical Image Archive (ECIA); Navy Publishing (Anacomp); Smartabase; Strategic Planning Enterprise Architecture & Requirements Human Performance (SPEARHP); United States Marine Core Marine Intercept Program (USMC MIP); International SOS (ISOS); Business Intelligence Common Services (BCS); and the Defense Enrollment Eligibility Reporting System (DEERS), Data Access Service;

Other Federal Information Systems (VA Information Systems): Data Exchange Service; and Veterans Benefits Management System.

**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)

Information Sharing - System to System:

- DoD Information Systems: Data Access Service (to VA), AHLTA; AFMETS; HRR; ECIA; Navy Publishing; Smartabase; SPEARHP; USMC MIP; ISOS; BCS; and DEERS.

- VA Information Systems: Data Exchange Service, and Veterans Benefits Management System.

**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.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.

**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. (STR) NI-330-10-003, item 1, (NSTR) NI-330-01-002, item 2, (OHTR)

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

(3) Retention Instructions.

FILE NUMBER: 927-01, STR  
Disposition: Temporary. Cut off after the date of separation of the member from the Armed Services.  
Destroy 100 years after cutoff

FILE NUMBER: 927-02, NSTR  
DISPOSITION: Temporary. Cut off after the end of the calendar year of the last date of treatment. Retire to the National Personnel Records Center (NPRC) 5 years after cutoff. Destroy 50 years after cutoff.

FILE NUMBER: 202-26.2, OHTR  
Disposition: Temporary. Cut off upon separation of employee or when the Official Personnel File (OPF) is destroyed, whichever is later.  
Destroy 30 years after cutoff. NOTE: When an employee transfers to another Federal agency, the long-term Occupational Individual Medical Case Files must be transferred to the gaining agency at the same time as the employee's OPF in accordance with 5 CFR 293, Subpart E - §293.510(a).

FILE NUMBER: 927-04, Inpatient records  
DISPOSITION: Temporary. Cut off after the end of the calendar year of the completion of the records or upon closure of treatment center MTF or rotation to another military department, whichever is first. Retire to the National Personnel Records Center (NPRC), return to parent unit medical record department, or hold in theater holding area no later than 1 year after cutoff. Destroy 50 years after cutoff.

**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, Department Regulation; 10 U.S.C., Chapter 55; Pub.L. 104-91, Health Insurance Portability and Accountability Act of 1996; DoD Manual 6025.18, DoD Health Information Privacy Regulation; 10 U.S.C. Chapter 55, Medical and Dental Care; 32 CFR 199.17, TRICARE Program; 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.

The HAIMS Platform does not require an OMB Control Number as the platform does not serve as the initial point of information collection.