

## 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:**

DynaCAD Breast and Prostate Application

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

05/17/24

Alexander T. Augusta Military Medical Center (ATAMMC)

### 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 DynaCAD Breast and Prostate Application (DynaCAD) is a Client/Server software application residing within Customer-owned, Customer-managed Servers. DynaCAD receives Digital Imaging and Communication in Medicine (DICOM) files to/from customer scanners and/or Picture Archiving and Communication System (PACS) system(s) into DynaCAD software; clinical end users (radiologists) access/view those files from customer Clients/desktops. DynaCAD is not intended to be used as a storage device; all patient files should be saved back on PACS system and deleted from DynaCAD. Customer site administrator of DynaCAD, typically PACS Administrator, manages end user access.

The Personally Identifiable Information (PII) that accompanies the DICOM images to identify patients may include demographic information, personal contact information, employment information, disability information, financial information, child information, emergency contact information, medical information, and Protected Health Information (PHI). PII is retrieved via a HL7 query from the MHS Genesis through which medical devices and systems on the network have access. DynaCAD does not utilize any mobile applications.

The PII is from members of the general public an Federal employees, such as, Armed Forces members, family members, retirees, and patients eligible for care.

The information stored in this system consists of personally identifiable information (PII) protected by the Privacy Act and personal health information (PHI) protected by the Health Insurance Portability and Accountability Act (HIPAA). The DoD Health Information Privacy Regulation (DoD 6025.18) issued pursuant to the HIPAA of 1996, applies to most health information. DoD 6025.18 may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this System of Records Notice (SORN).

The DynaCAD Information System is Defense Health Agency (DHA) owned and operated.

**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 the purposes of patient identification. The intended use of PII is to distinguish, track, and deliver timely and effective patient care. In addition, intended uses of PII include treatment, payment, and healthcare operations.

**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 have the opportunity to object at the face-to-face point of care. Individuals are presented Department of Defense (DD) Form

2005, Privacy Act Statement – Health Care Records for review and signature. This form is placed in the patient’s medical record. If individuals do not sign the form or object to the collection of their PII, comprehensive medical care can be delayed but not 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.

Individuals have the opportunity to consent to specific uses of their PII face-to-face at the point of care. Individuals are presented Department of Defense (DD) Form 2005, Privacy Act Statement – Health Care Records for review and signature. This form is placed in the patient’s medical record. If individuals do not sign the form or object to the collection of their PII, comprehensive medical care can be delayed but not denied.

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

This statement serves to inform you of the purpose of collecting personal information required by DynaCAD system and how it will be used.

AUTHORITY: Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 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. 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 6025.18-R, DoD Health Information Privacy Regulation

PURPOSE: Clinical personnel (radiologists) can access and view digital images using DynaCad at their workstation. DynaCAD uses personally identifiable information and protected health information, such as demographic, medical record, and diagnostic/therapeutic data elements on patients.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3). For additional information on SORN, EDHA 07, <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNS/DHA/EDHA-07.pdf>

DISCLOSURE: Voluntary: however, failure to provide the requested information will result in denial of access or application submission.

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.
- Other DoD Components (i.e. Army, Navy, Air Force) Specify.
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) Specify.
- 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.
- 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

MHS Genesis

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 checked="" 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.

**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.

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

(3) Retention Instructions.

FILE NUMBER: 103-14

DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate)

**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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 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  
Does this DoD Information System or Electronic Collection Facility (MTEF) approved by DoD Health Information Privacy 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.

According to section 8 of the "DOD Information Collections Manual: Procedures for DoD Public Information Collections", the PIA collected by DynaCAD is not considered public information collections and does not require an active and approved (OMB) Control Number.