

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:

Ektropy

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

05/20/24

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.)

- 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.

Ektropy (EKT), an Enterprise Resource Planning (ERP) tool, that addresses budgeting and resource concerns and program dependencies in order to improve business practices and enable the Defense Health Agency (DHA) to plan beyond the current Fiscal Year Defense Plan (FYDP). EKT is a combination of a Government Off The Shelf (GOTS) and Commercial Off The Shelf (COTS) products running on a Platform as a Service (PaaS). EKT does not use a mobile application. EKT provides DHA a centrally located, standardized process that provides informed analysis of resources, budgets and cost to eliminate redundancies and improves organizational contract deliverables.

The types of PII collected includes necessary employment information, and work or business contact information necessary to authenticate the EKT user.

Ektropy software is managed by the DHA Solution Delivery Division (SDD) Clinical Support 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)

EKT maintains PII for authentication and administrative use. EKT utilizes PII for access management and to provide informed analysis of budgeting and execution planning activities, program and project management processes, and program execution and management.

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.

EKT is not the initial point of collection of the PII; therefore, individuals do not have the opportunity 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.

EKT is not the initial point of collection of the PII; therefore, individuals do not have the opportunity to consent to 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

EKT is not the initial point of collection of PII; therefore, no Privacy Act Statement or Advisory is required for EKT.

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. PEO DHMS; PEO Medical Systems/CIO (J-6); J-3; J-5; J-7
- 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.)

NetImpact Strategies, Inc. provides Operations and Management support to EKT and therefore has full administrative access to the system.

The following contractual language ensures NetImpact Strategies, Inc. safeguards PII: "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 Manual (DoDM) 6025.18, "Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs" dated March 13, 2019, and DoD 5200.2-R, "Personnel Security Program Requirements."

NetImpact Strategies, Inc. contractor responsibilities for ensuring personnel security include, but are not limited to, meeting the following requirements: (1) Follow the DHA 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; (2) Contact the DHA Privacy - Office for guidance on the appropriate ADP/IT levels for personnel on the contract; (3) Initiate, maintain, and document personnel security investigations appropriate to the individual's responsibilities and required access to Military Health System (MHS) Sensitive Information (SI); (4) Immediately report to the DHA 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, or if directed to do so by the appropriate Government representative for security reasons; and (5) Ensure that all Contractor personnel receive information assurance (IA) training before being granted access to DoD AISs/networks, and/or MHS SI information.

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

Individuals - Manual Entry from Supervisor(s)/Contracting Officer Representative(s)(CORs)
Existing DoD Information Systems - iAS (Identity Authentication System)

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 checked="" type="checkbox"/> Other (If Other, enter the information in the box below) | |

Information Sharing - System to System: iAS
Other - Manual Entry from Supervisor(s)/CORs

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.

Ektrropy 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.

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.

FILE NUMBER: 206-03
DISPOSITION: Temporary. Cut off annually. Destroy 3 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.

10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; E.O. 12656, Assignment of Emergency Preparedness Responsibilities; DoDD 5136.01, Assistant Secretary of Defense for Health Affairs (ASD(HA)); DoDI 1322.24, Medical Readiness Training; DoD 6010.13-M, Medical Expense and Performance Reporting System for Fixed Military Medical and Dental Treatment Facilities Manual. The above cited authorities and DoD implementing guidance are the basis for the MHS enterprise, and the EKT tool supports the

management of the personnel, funding, and contracts necessary for the success of the enterprise.

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 approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections" because EKT does not directly collect information from the public.