

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:

Extract Lab Management System (ELMS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

06/24/24

US Army Centralized Allergen Extract Laboratory

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 Extract Lab Management System (ELMS) is a web-based application used for the on-line electronic ordering, processing and formulation of allergen extract patient prescriptions and diagnostic testing antigens used for both the diagnosis and treatment of allergy patients. ELMS provides Medical staff worldwide the ability to track the status of their orders and document allergen extract skin testing results and allergy shot information.

ELMS provides this allergen extract prescription ordering and processing service to more than 460 Department of Defense (Army, Navy and Air Force) and Department of Veteran's Affairs medical treatment facilities worldwide for over 30,000 patients annually. The categories of individuals with records in ELMS are active duty military and their family members, military veterans and retirees.

Personal Identifying Information (PII) collected in ELMS include patient status and demographic information as well as related Allergy-Immunization medical information.

ELMS is owned and operated by the Unites States Army Centralized Allergen Extract Laboratory (USACAEL).

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 PII is collected for identification purposes to match patients with their respective allergy records and reports. The intended use of the PII is for mission-related purposes to support the management and administration of allergen extract prescriptions.

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 to the collection of their PII at the point of care.

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 the specific uses of their PII at the point of care.

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

PRIVACY ACT STATEMENT - HEALTH CARE RECORDS

1. **AUTHORITY:** 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); DoDI 6055.05, Occupational and Environmental Health (OEH); and E.O. 9397 (SSN), as amended.

2. **PRINCIPAL PURPOSES:** Information may be collected from you to provide and document your medical care; determine your eligibility for benefits and entitlements; adjudicate claims; determine whether a third party is responsible for the cost of Military Health System (MHS) provided healthcare and recover that cost; DD Form 2005, Privacy Act Statement – Health Care Records 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.

3. **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 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, DoD Blanket Routine Uses available at: <http://dpcl.d.defense.gov/privacy/SORNsIndex/BlanketRoutineUses.aspx>. Protected health information (PHI) in your records may be used and disclosed 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.

4. **DISCLOSURE:** Voluntary. If you choose not to provide the requested information, comprehensive health care services may not be possible, you may experience administrative delays, and/or be rejected for service or an assignment, however, care will not be denied.

Applicable SORN is <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)

- | | | |
|---|----------|--|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. | DHA Military Treatment Facilities (MTFs) |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | Army, Navy and Air Force MTF |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | Veteran Administration Medical Center (VAMC) |
| <input type="checkbox"/> State and Local Agencies | Specify. | |
| <input checked="" type="checkbox"/> 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. | Madigan Dean McCormack (MDM) Technologies. IT contract with no patient care activities involved. contract requires the contractor to safeguard PII and adhere to the FAR Privacy Clauses: 52.224-1, Privacy Notification; 52.224-2, Privacy Act; and FAR 39.105, Privacy. The Contractor/Health Care Provider (HCP) shall ensure the confidentiality of patient records, as embodied in federal statutes including the Privacy Act of 1974 and the Drug and Alcohol Act, Public Law 92-129 and HIPAA". Also stated, "The Contractor/HCP shall abide by the Medical Treatment Facility (MTF) rules, regulations and by laws, including Medical Staff By laws, as well as applicable regulations governing such things as medical records. |
| <input type="checkbox"/> 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 type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

There are no other existing DoD information systems that are connected to ELMS.

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 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) | |

The medical staff at the allergy/immunization treatment clinics enter the patient's information in ELMS.

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.

As applicable:
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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 USC, Chapter Ch. 55, Medical and Dental Care; 10 USC 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 USC 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 USC 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 USC 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 USC 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 USC 290dd, Substance Abuse Among Government and Other Employees; 42 USC 290dd-2, Confidentiality Of Records; 42 USC 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 Manual 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs 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.

The information collected in this system is for the diagnosis and treatment of medical conditions and is not considered a public information collection per DoDM 8910.01, V2, Encl 3, paragraph 8b(5).