

## 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:**

Joint Pathology Information Management System 5.x

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

07/15/24

### 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 Joint Pathology Information Management System (JPIMS) is a Government Developed Off the Shelf (GOTS) web-based healthcare application that is utilized by The Joint Pathology Center (JPC) to process, manage, and electronically track pathology cases which are sent to the JPC from military health facilities and contributing veteran administrations.

The JPC receives secondary consultative requests from Military Treatment Facilities and the VA. Military Treatment Facilities and the VA must fill out a "Consultative Request Form" that details all the patients data that was received from the receiving parties CHCS and/or AHLTA. These secondary consultative requests are sent over via mail and received by the JPC. The request will include the "Consultative Request Form" that has been filled out by the clinician along with specimens from the patient. The JPC takes the patient information from the "Consultative Request Form" and manually enters it into JPIMS.

JPIMS is used to manage, store, and process all cases and materials received. These tasks are done through electronic material bar-coding, case accessioning for department and inter-department handling, processing lab orders, generating consultation reports and finalizing cases. Cases are received and placed in JPIMS.

JPC currently collects specimens from active-duty members, their dependents, and military retirees. Personally Identifiable Information (PII): name, Date of Birth, Social Security Number, demographic information, and Protected Health Information (PHI) such as surgical information. Each case is cataloged in JPIMS with a corresponding ascension number that is associated with that patient's information.

JPIMS is managed by the JPC Information Technology Department and is used by the clinical, repository, accessioning, and pathology departments in JPC and Walter Reed. The JPC JPIMS repository hosts information from specimens dating back over a hundred years and contains cases with PII from the general public, federal employees, foreign nationals, and both active and inactive military personnel.

**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 verification, identification, and processing of patients, their case relevant surgical information, and their lab orders. The intended use of the PII is for administrative and mission related use to verify the identity of a case, match the data from one patient number to all relevant surgical information to assist in case accessioning.

**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 JPIMS is not the initial point of collection for 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.

Individuals do not have the opportunity to consent to the specific uses of their PII as the system is not the initial point of collection for 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

JPIMS does not collect PII directly from individuals. Therefore, no Privacy Act Statement or Privacy Advisory is required.

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

Composite Health Care System (CHCS), Armed Forces Health Longitudinal Technology Application (AHLTA), and Military Health System (MHS) Genesis

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)

Fax: Paper form "JPC Pathology Consultation Request Form" number J-CS-FM-6465.03

**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.dod.mil/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.

Because the Joint Pathology Information Management System (JPIMS) will not collect any personally identifiable information (PII) directly from individuals to be stored in a system of records and retrieved by a personal identifier, no SORN is necessary. However, JPIMS will collect PII directly from other Military Treatment Facilities (MTF); thus, the system owners should monitor the SORN compliance posture of those other MTFs.

**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.

Unscheduled - Permanent. Treat system and/or records maintained in the system as permanent until a NARA approved schedule and disposition authority has been applied.

**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; DoDM 6025.18, Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs; 10 U.S.C. 1071-1085, Medical and Dental Care; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; 10 U.S.C. 1097a and 1097b, TRICARE Prime and TRICARE Program; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children; 10 U.S.C. 1079a, 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; DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD 6010.8-R, CHAMPUS; 10 U.S.C. 1095, Collection from Third Party Payers Act; and E.O. 9397 (SSN).

**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.

Per DoD Manual 8910.01 Vol2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections", OMB approval is not required as Joint Pathology Information Management System 5.x is not the initial point of PII collection.