

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:

Theater Medical Information Program Joint Composite Health Care System Cache (TC2)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

07/15/24

Joint Operational Medical System (JOMIS)

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.

Theater Medical Information Program (TMIP) Composite Health Care System (CHCS) Caché (TC2) software provides inpatient health care documentation and computer-based order for healthcare providers including ancillary service orders and result-reporting in the deployed environment. TC2 delivers an effective, inter-operable health care system that mirrors a subset of capabilities from the legacy Composite Health Care System (CHCS) to support the deployed medical business practice. TC2 is based on the Defense Health Agency (DHA) CHCS system which supports military health facilities in Garrison.

Personally identifiable information (PII) and protected health information (PHI) collected includes: employee and beneficiary contact information, military information, demographic information, Social Security Number (SSN), and Protected Health Information (PHI).

Categories of individuals about whom the Personally Identifiable Information (PII) and Protected Health Information (PHI) is collected for the system/electronic collection include active duty military (all services + Coast Guard and Reserve), veterans, dependents, retirees and/or their dependents, contractors, foreign nationals, former spouses, reservist, National Guard personnel, and prisoners of war.

The system is located at deployed Role 3 Military Treatment Facilities close to combat zones where the system is used to support force health protection, casualty care and detainee care. The TC2 application is used on Hospital Ships to support force health protection, casualty care and provide humanitarian assistance. TC2 is installed, and managed by the component military service personnel responsible for the Role 3 facility and supported, and owned by the Joint Operational Medical System (JOMIS) Program 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)

PII/PHI is collected to determine eligibility and administer health care delivery services. Data is used for patient care management; administer health care delivery services, support the functions of patient contact, correct identification of patients, patient tracking, etc. User data is collected to support administration and clinical practice authorization and access.

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.

Submission of information is voluntary, individuals may object or request restrictions on the use of PII/PHI by submitting DD 2871.

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.

Consent to the specific uses of PII is obtained as necessary per DoD 5400.11-R, DoD Privacy Program, C4.1.3. and disclosures as set forth in DoD Manual (DoDM) 6025.18, Implementation of the HIPAA Privacy Rule in DoD Health Care Programs. Individuals are informed of these uses and are given the opportunity to consent or restrict the use of their PHI. For uses other than treatment, payment and healthcare operations, individuals authorize the use of their PHI by submitting DD 2870.

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

Patients sign a Privacy Act Statement (DD 2005) that is kept in the Outpatient Record.

This statement serves to inform you of the purpose for collecting personal information required by TC2 and how it will be used.

AUTHORITY: 10 USC Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); and EO 9397 (SSN), as amended.

PURPOSE: To collect information from you to determine your eligibility, document and provide health care within the theater environment.

ROUTINE USES: Information in your records may be disclosed to private physicians and Federal agencies, including the Departments of Veterans Affairs, Health and Human Services, and Homeland Security in connection with your medical care; other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and non-government third parties to recover the cost of healthcare provided to you by the Military Health System.

Any protected health information (PHI) in your records may be used and disclosed generally as permitted by the HIPAA Privacy Rule (45 CFR Parts 160 and 164), as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, healthcare operations, and the containment of certain communicable diseases.

For a full listing of the applicable Routine Uses, refer to the applicable SORN: EDHA 07, Military Health Information System (78 FR 69076) located at: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570672/edha-07/>

DISCLOSURE: Voluntary. If you choose not to provide your information, no penalty may be imposed, however, absence of the requested information may result in administrative delays.

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. | Defense Health Agency |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | Army, Navy, Air Force, Marines Corps
US Coast Guard (USCG)
Department of Health and Human Services (HHS) and its components.
Federal offices and agencies involved in the documentation and review of defense occupational and environmental exposure data, including the National Security Agency, and Defense Logistics Agency. |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | Congressional Budget Office
Department of Veterans Affairs (VA)
National Research Council, National Academy of Sciences, National Institutes of Health, Joint Pathology Center (JPC), and similar institutions for authorized health research in the interest of the Federal Government and the public. |
| <input checked="" type="checkbox"/> State and Local Agencies | Specify. | To local and state government and agencies for compliance with local laws and regulations governing control of communicable diseases, preventive medicine and safety, child abuse, and other public health and welfare programs. |

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.

A supporting Data Use Agreement (DUA) in place when access to PII/PHI is required. Vendor handling PII do so in a closed environment to research a trouble ticket, once complete with the analysis the data is destroyed. Contract number W81XWH-15-0421 (Development Contract) Section 6.4.5 Business Associates states: "The Contractor meets the definition of Business Associate, and DHA meets the definition of a covered entity under the HIPAA Rules and DoD HIPAA Issuances. Therefore, a Business Associate Agreement (BAA) between the Contractor and DHA is required to comply with the HIPAA Rules and DoD HIPAA Issuances. This paragraph 8 serves as the required BAA. As a Business Associate, the Contractor shall comply with the HIPAA Rules and the DoD HIPAA Issuances applicable to a business associate performing under this Contract. FAR privacy clauses 52.212-1, FAR 52.212-3, FAR 52.213-4, and FAR 52.212-5 are included in the contract."

Other (e.g., commercial providers, colleges).

Specify.

TC2 collects PII during humanitarian operations, from casualties of war, from coalition forces and detainee care. The PII is shared with the host nation and may or may not be shared per established policies for information sharing in each category.

PII is collected per DoD Directives 5124.02 and 5136.01 and Sections 401, 404, 407, and 2561 of Title 10, United States Code. DoD Instruction 6200.07 – Delivery of Direct Health Care To Non-Detainee Host Nation (HN) Civilians establishes policy, assigns responsibilities, and provides procedures for DoD personnel engaged in or supporting the delivery of direct health care to HN civilians during military exercises or operations, when authorized and in accordance with DoD Instructions (DoDIs) 2205.02, 3000.05, and 6000.16, or as part of authorized overseas humanitarian, disaster and civic aid activities, in accordance with DoD Directive 5100.46. Foreign military members are entitled to MTF care pursuant to a reciprocal health care or other applicable international agreement (e.g., North Atlantic Treaty Organization [NATO], Partnership for Peace Status of Forces Agreement [PFP SOFA]).

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 checked="" type="checkbox"/> Existing DoD Information Systems | <input type="checkbox"/> Commercial Systems |
| <input type="checkbox"/> Other Federal Information Systems | |

Demographic data is collected by health care providers/administrators direct entry into the system and by system interface with AHLTA-T.

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 checked="" type="checkbox"/> Paper |
| <input checked="" 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) | |

Data is collected from the patient, a system user scanning the DMDC CAC or collected by AHLTA-T and transmitted to TC2.

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.

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.

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.