

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:

Dental Common Access System (DENCAS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

07/25/24

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.)

- 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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

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 Dental Common Access System (DENCAS) is an automated dental administrative management system that is composed of both a Web-based and client-based application (DENCAS Remote). The function of DENCAS is to support the approximately 50 afloat units with a dental staff and ship-deployed U.S. Marine Corps (USMC) units to store, process, and retrieve data to maintain dental readiness of the command. DENCAS assists the shipboard dental departments and deployed USMC units in monitoring the dental needs of personnel and tracks provider workload. DENCAS provides a centralized repository for patient dental readiness and Dental Management Data (DMD) provider workload. DENCAS Remote is used by the ships and ship-deployed USMC units when Internet connectivity is an issue.

At the corporate level, the Director of Navy Dentistry can view patient and productivity data either Navy-wide or drill down to various Navy Dental Commands. Dental liaisons at bases (use Corporate Dental System (CDS) and not DENCAS) and in the fleet (Ships use DENCAS Remote underway but revert to CDS when pier side) are able to view their unit's dental readiness and obtain a list of individuals who need to be sent for dental treatment or for exams.

Two types of data are kept – patient treatment data and provider data (number of procedures, patients, etc.) which is historical for metrics. The provider data can show number of treatments at all levels but is not patient specific.

The only patient specific data stored is on present health status and dental needs. There is no historical treatment data retained.

The types of personal information about individuals collected in the system include name, social security number (SSN), DoD Electronic Data Interchange Personal Identifier (EDIPI)/other ID number, date of birth, protected health information such as dental treatment information, contact information, position/rank, and addresses. SSN still required at this time to support Navy Readiness systems that receive dental readiness data. Personnel information is maintained on active-duty personnel.

DENCAS management by DHA/J-6 Health Information Technology/Solutions Delivery Division was transferred to the Joint Operational Medicine Information System (JOMIS) Program Office for Program Executive Officer Defense Healthcare Management System (PEO DHMS) in FY22.

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 patient verification and identification and retrieving the servicemember's Dental Readiness Classification (DRC). The DRC will determine if the service member is deployable or not. The intended use of the PII is to ensure the servicemember's dental readiness is conducive to deployment.

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 cannot object to the collection of PII because DENCAS depends on PII to retrieve their dental record to provide treatment.

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 cannot consent to the collection of PII because DENCAS depends on PII to retrieve their dental record to provide treatment.

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 system is not the initial collection point for the PII. The PII is obtained from an existing DoD information system or electronic collection, 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. DENCAS shares data with Corporate Dental System (individual dental readiness)

Other DoD Components (i.e. Army, Navy, Air Force)

Specify. Army and Air Force; This information can be shared with all Navy and Marine Corps dentists to determine dental readiness of all Navy and Marine Corps dental patients

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.

The vendor, CACI Inc, provides programming, development, and Help Desk support for the DENCAS product. In almost all cases where the vendor handles trouble tickets and modifications to a system that contains PII they will have access to PII through the system.

The contract support agreements include the standard Military Health System (MHS) HIPAA Business Associate Agreement, thereby requiring compliance with DoD information security and privacy policies for PII and PHI. The contract also requires compliance with all applicable privacy and security laws and regulations, including data breach reporting and response requirements, in accordance with DFAR Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, DoD Privacy Program, and DoD 5400.11-R, Department of Defense Privacy Program. The contractor must also comply with the Freedom of Information Act (Defense Federal Acquisition Regulation (DFAR) Subpart 224.2). Data Sharing Agreement (DSA) #19-2096.

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

PII is collected by the staff from the individual service member during the exam/treatment and logged into DENCAS. Data is also collected

from existing DoD information systems including Navy Standard Integrated Personnel System (NSIPS), Marine Corps Total Force System (MCTFS) for demographic data such as name, SSN, EDIPI. DENCAS shares data with Corporate Dental System (individual dental readiness).

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- | | |
|---|---|
| <input checked="" type="checkbox"/> E-mail | <input checked="" 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) | |

Forms used: Navy Medicine (NAVMED) Form #6600/. PII is collected from existing DoD information systems including Navy Standard Integrated Personnel System (NSIPS), Marine Corps Total Force System (MCTFS) for demographic data such as Name, SSN, and EDIPI. DENCAS gets data from Corporate Dental System (individual dental readiness).

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.

FILE NUMBER: 927-01
DISPOSITION: Temporary. Cut off after the date of separation of the member from the Armed Services. Destroy 100 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.

Authorities: 10 U.S.C., Chapter 55, Medical and Dental Care

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 disorders and although it does collect PHI/PII directly from individual servicemembers it does not collect from the general public and is not considered a public information collection IAW DoDM 8910.01, V2, Encl 3, paragraph 8b(5).