

## 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:**

NON.MIL\_Georgia Organization Network

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/04/24

Medical Research and Development Command (MRDC)

### 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 type="checkbox"/> Existing DoD Information System               | <input checked="" 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.**

NON.MIL\_Georgia Organization Network (GON) is a secure, stand alone non-dot mil network that consists of hardware, software, and telecommunications systems providing network security and network data transport services for DHA systems. GON provides an unclassified communication network infrastructure and network system environment to support the WRAIR E-ME research mission of antibiotic resistant organisms and antibiotic development in the Republic of Georgia. It serves as a repository for Personally Identifiable Information (PII) for various scientific studies conducted at the Lugar Center, Tbilisi, Georgia. Data communications to or from any DHA application are subject to data security monitoring and inspection including, but not limited to, PII data. GON includes user interfaces such as workstations and laptops, hosting medical systems and applications. Commercial-Off-The-Shelf (COTS) applications including Microsoft Word Excel, PowerPoint, and Outlook are utilized to provide administrative support.

Personally Identifiable Information (PII) may be collected, maintained, processed, or disseminated by systems and applications within the GON. PII includes full name (surname and first name), contact information, military information, demographic information, and Protected Health Information (PHI).

Personally Identifiable Information (PII) is collected from the following: Georgian nationals, U.S. military (active, reserve, retired), EU patients/study subjects.

**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 identification purposes to match personnel with their sample results, and in some cases may be linked to bed or ward number. The intended use of the PII collected is for administrative and mission-related purposes to support personnel management operations. PII Life cycle: PII is manually entered or contained in documents electronically transferred to the Shared File System; periodically updated; and removed when no longer required for conducting business.

**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.

This system is not the initial point of collection, PII is obtained from existing medical records.

**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.

This system is not the initial point of collection, PII is obtained from existing medical records.

**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

Operators of the GON do not collect PII directly from individuals; however, system components, applications, and electronic collections within the enclave might collect PII; system is not the initial point of collection for the PII.

**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.

PII may be shared with personnel who have authorized access to systems within the GON.

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.

PII may be shared with personnel who have authorized access to systems within the GON.

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

The PII is obtained from surveillance sites databases.

**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)

PII is contained in documents delivered via paper copy and/or electronically transferred to the Shared File System or manually entered by a staff member.

**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://dpcltd.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.

NON.MIL\_Georgia Organization Network is not a System of Record per DoD Regulation 5400.11-r

**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.

The LAN/Enclave itself does not have a NARA approved, pending, or GRS authority and retention instructions applied as a whole. Refer to NARA approved, pending, or GRS authority and retention instruction specific to the systems, applications, electronic collections, file servers, and share drives contained within the LAN/Enclave.

**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 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 42 USC Ch 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; DoD Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD 6025.18-R, DoD Health Information Privacy Regulation.

**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 not considered a public information collection per DoDM 8910.01, Volume 2, Enclosure 3, paragraph 8b(5)