

## 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:**

Automated Neuropsychological Assessment Metrics Standalone Field System (ANAM SFS)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/05/24

### 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                       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.**

The Automated Neuropsychological Assessment Metrics Standalone Field System (ANAM SFS) is a Type-III Stand-Alone (air-gapped) network used to conduct and process the ANAM assessments. The ANAM tool provides a computer-based test of cognitive functioning to assess the cognitive performance of Department of Defense (DoD) Service Members (SMs) and Civilians (CIVs).

The ANAM tool is a commercially-developed software system used to conduct cognitive assessments and manage concussive events over time. The cognitive performance modules measure speed, simple decision-making, and various memory components. The baseline ANAM scores allows providers to compare repeat ANAM test scores in healthy, suspected or confirmed Traumatic Brain Injury (TBI) cases, showing either cognitive stability, improvement, or decline. When personnel experience a Potentially Concussive Event (PCE), the ANAM assessment allows providers to assess cognitive status and track their recovery. The ANAM SFS is located at different military installations and more than 3.3 million ANAM assessments have been conducted and processed since the program was initiated in June 2007. This PIA addresses the management of ANAM data on the ANAM SFS, as well as ANAM data provided to other DoD organizations through approved data sharing / use agreements.

The categories of individuals with Personal Identifiable Information (PII) in this ANAM SFS are SMs and DoD CIVs from all Military Services. In addition, PII is shared with authorized Department of Veterans Affairs (VA) medical providers after the SM is discharged.

PII collected includes contact information, military records, demographic information, education information, and medical information, including Protected Health Information (PHI). The PHI collected is generated through self-report surveys, and cognitive performance scores that are all included within the ANAM SFS.

The ANAM SFS is owned and managed by the Neurocognitive Assessment Branch (NCAB) within the Soldier Performance Division (SPD), U.S. Army Office of the Surgeon General (OTSG).

**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 verification, identification, and authentication purposes to match individuals with their records and ensure the accuracy of the records when they are integrated with related records for the same individual. The intended use of the collected PII is for mission-related purposes to support diagnostics, health care services, and research activities.

**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.

(Note: Please do not change. This is the current process in place for the Military Service Members)

Individuals receive a briefing which provides information about injuries to the brain prior to assessment, the ANAM tool and the protection of their assessment results in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA) of 1996. They also must review the Privacy Act Statement described in Section 1g below. Although the disclosure of PII is voluntary, failure to provide the requested information violates provisions in DoDI 6490.13, Comprehensive Policy on Neurocognitive Assessments by the Military Services, which mandates completion of a cognitive assessment throughout the deployment cycle.

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.

(Note: Please do not change. This is the current process in place for the Military Service Members)

Individuals receive a briefing which provides information about injuries to the brain prior to assessment, the ANAM tool, protection of their assessment results in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA) of 1996. They also must review the Privacy Act Statement described in Section 1g below which outlines the specific uses of their PII. Although the consent to the specific uses of their PII is voluntary, failure to consent to the specific uses of PII, violates provisions in DoDI 6490.13, Comprehensive Policy on Neurocognitive Assessments by the Military Services, which mandates completion of a neurocognitive assessment throughout the deployment cycle.

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

ANAM PAS:

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

AUTHORITY: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 7013, Secretary of the Army; DoDI 1322.24, Medical Readiness Training; DoDI 6490.13, Comprehensive Policy on Neurocognitive Assessments by the Military Services and E.O. 9397 (SSN), as amended.

PURPOSE: Information is collected from individuals to verify the identity of eligible users of the ANAM and to track the completion of Federal and Department mandated assessment and training.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as follows: to the VA to adjudicate claims and provide medical care; to the National Research Council and similar institutions for authorized health research; to local and State government and agencies to comply with local laws and regulations governing certain public health and welfare programs; to certain third party payers as per 10 U.S.C. 1095, as amended, and relevant DoD guidance; to certain former DoD health care providers in response to a malpractice claim or litigation; and the DoD "Blanket Routine Uses" set forth at the beginning of the Office Of Secretary of Defense compilation of systems of records notices also apply to this system. Any PHI may be used and disclosed generally as permitted by the HIPAA Rules, as implemented within DoD. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

APPLICABLE SORN: The Privacy Act Systems of Records Notice (SORN) covering the collection of data within the ANAM Data Repository is DHA SORN EDHA 07, Military Health Information System (June 15, 2020; 85 FR 36190). System Location: Defense Health Agency (DHA), Electronic Health Records (EHR) Core Program Office, 7700 Arlington Boulevard, Falls Church, VA 22042-510. System Manager(s): Program Manager, EHR Core Program Office, 1700 N Moore Street, Suite 2300, Arlington, VA 22209. dha.ncr.peo-ipo.mbx.peo-dhms-communications@mail.mil.

DISCLOSURE: Voluntary. If you choose not to provide the requested information, there may be an administrative delay; however, care will not be denied and no penalties will be imposed.

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.	U.S. Army Organizations
<input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)	Specify.	DoD Medical Treatment Facilities U.S. Air Force, Navy, Marine Corps, and Space Force organizations
<input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)	Specify.	Department of Veterans Affairs Healthcare System
<input type="checkbox"/> 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.)

Cordova Central, LLC.

The contractor may use or disclose PHI on behalf, or to provide services to, the Government for treatment, payment, or healthcare and readiness operations purposes, in accordance with the specific use and disclosure provisions below, if such use or disclosure of PHI would not violate the HIPAA Privacy Rule, DoD 6025.18-R or DoD 8580.02-R if done by the Government.

- The contractor may disclose PHI for the proper management and administration of the Contract, provided that disclosure will remain confidential and used, or further disclosed only as required by law, for the purpose for which it was disclosed to the person, and the person notifies the Contractor of any instances of which it is aware in which the confidentiality of the information has been breached.

- The contractor agrees to use administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic PHI that it creates, receives, maintains, or transmits in the execution of this Contract.

- This contract contains the required FAR privacy clauses.

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
- Existing DoD Information Systems
- Other Federal Information Systems
- Databases
- Commercial Systems

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

- E-mail
- In-Person Contact
- Fax
- Information Sharing - System to System
- Other (If Other, enter the information in the box below)
- Official Form (Enter Form Number(s) in the box below)
- Paper
- Telephone Interview
- Website/E-Form

**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 EDHA 07

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.

**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.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected 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; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. 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); 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.

The information in this system is not collected from members of the public; therefore, OMB approval for this collection is not required.