

## 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:**

Enterprise Clinical Imaging Archive

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/23/24

PMO - Integrated Clinical Systems (CAE)

### 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 Enterprise Clinical Imaging Archive (ECIA) is a commercially developed system of virtual and physical devices designed for the effective ingestion, transmission, display, and management of medical images. ECIA provides for medical images in digital output that can be retrieved or viewed by any facility within the Military Health System (MHS) for analysis and diagnosis of patients, as well as for training purposes. The system is the primary long term storage location for all medical images utilized in diagnostic interpretation which allows facilities to retrieve all images on a patient regardless of the originating facility.

The ECIA is a single purpose medical imaging management system consisting of a combination of hardware and software dedicated to the longterm storage, retrieval, administration, distribution and presentation of medical images, thus achieving full interoperability across multiple disparate systems by consolidating long-term image management.

Personally Identifiable Information (PII) collected includes member contact and military information, demographic information, Social Security Number (SSN), and Protected Health Information (PHI). The categories of individuals on whom PII is collected include Military members of the Armed Forces, DoD civilian employees, military family members, DoD Beneficiaries, volunteers, and Foreign Nationals.

**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)

The PII collected is for identification, verification, authentication, data matching, mission-related use, and used to identify medical images pertinent to a particular imaging study ensuring results are entered into the correct patient record.

**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 it is obtained from existing DoD Information Systems.

**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 collection of their PII, as it is obtained from existing DoD Information Systems.

**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

The individual does not directly participate in the PII collection process for this system. The PII in this system is obtained from existing DoD Information Systems.

**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. | Authorized health care providers and identified super users within the DHA medical treatment facilities (MTF).   |
| <input checked="" type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force)   | Specify. | Authorized health care providers within Army, Navy, Marines, and Air Force MTFs.   |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)  | Specify. | Authorized health care providers within US Coast Guard, Department of Veterans Administration, US Public Health Service, and Center for Disease Control.   |
| <input checked="" type="checkbox"/> State and Local Agencies  | Specify. | Patient's State and Local Commercial Medical Treatment Facilities.   |
| <input checked="" type="checkbox"/> 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. | Dell and Hyland servicing the device may have access to data. Contractor radiologists providing radiology support needing direct access to patient studies. Laws and regulations governing this type of access includes: Standard Military Health System (MHS); Health Insurance Portability and Accountability Act (HIPAA); Business Associate Agreement; DoD/HIPAA guidelines; and DHA Information Assurance (IA) guidelines. FAR 52.224-3 Privacy Training; FAR 52.239-1 Privacy or Security Safeguards clauses are included in the contract. |
| <input type="checkbox"/> 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)

- |  |   |
|--|---|
| <input 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           |   |

CHCS, MHS Genesis, DEERS

**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 checked="" type="checkbox"/> Official Form (Enter Form Number(s) in the box below) |
| <input 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 checked="" type="checkbox"/> Website/E-Form  |
| <input type="checkbox"/> Other (If Other, enter the information in the box below) |   |

**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://dpclid.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. GRS 2.7, item 070 (DAA-GRS-2017-0010-0012)

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

FILE NUMBER: 103-14  
DISPOSITION: Temporary. Cut off and Destroy upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

**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.

10 USC 3013, Secretary of the Army; 10 USC 1071-1085, Medical and Dental Care; 50 USC Supplement IV, Appendix 454, as amended, Persons liable for training and service; 42 USC Chapter 117, Sections 11131-11152, Reporting of Information; 10 USC 1097a and 1097b TRICARE Prime and TRICARE Program; 10 USC 1079, Contracts for Medical Care for Spouses and Children; 10 USC 1079a, CHAMPUS; 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; EO 9397 (SSN); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD Directive 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS)

**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).