

## 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:**

ICAD Powerlook Pro (IPP)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

09/25/24

Fort Belvoir Community Hospital

### 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.**

ICAD Powerlook Pro (iPP) application is based on the Microsoft Windows Server platform (64-bit architecture), Operating on Windows 10. iPP is a host-based system with four major functionalities to include the Powerlook, ProFound AI, SecondLook and Density Assessment.

PowerLook serves as the host platform for iCAD's Breast Health algorithm solution. The system consists of hardware and software and manages all DICOM connectivity for receiving images for processing from acquisition systems and sending results and display and storage systems such as mammography workstations, PACS, and DICOM archives.

ProFound AI detects malignant soft-tissue densities and calcifications in digital breast tomosynthesis (DBT) images. ProFound AI has the same performance with the DBT systems cleared for use with ProFound AI; furthermore, it provides support for additional DBT systems. The ProFound AI Software allows a radiologist to quickly identify suspicious soft tissue densities (masses, architectural distortions and asymmetries) and calcifications by marking the detected areas in the tomosynthesis images.

The SecondLook computer-aided detection system for 2D mammography is intended to identify and mark regions of interest on standard 2D mammographic views to bring them to the attention of the radiologist after the initial reading has been completed. Thus, the system assists the radiologist in minimizing observational oversights by identifying areas on the original mammogram that may warrant a second review.

The PowerLook Density Assessment Software analyzes digital breast tomosynthesis 2D synthetic images to calculate the dense tissue area of each breast. The iPP has no requirement for a monitor, keyboard, or mouse.

ICAD Powerlook Pro (iPP) collects, processes, and distributes Personally Identifiable Information (PII), including Protected Health Information (PHI), demographic and personal descriptors, Identification (ID) numbers, health information, personal contact information, and employment contact information. These categories of PII are collected from DoD, VA, and USCG beneficiaries and their dependents for the delivery of health care services, the determination and processing of patient benefit information, as well as for Defense Health Agency (DHA) authorized clinical trials, medical research, and oncology registries.

**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/PHI information is collected for the purposes of patient identification, tracking, and delivery of timely and effective patient care.

**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.

The opportunity for individuals to object to the collection of PII is provided to patients at FBCH reception areas. The MHS Notice of Privacy Practices explains the MHS practices and responsibilities regarding PHI use/disclosure, requirements, authorizations, and the patient's rights to inspect/amend records, and to request restrictions to or an accounting of disclosures.

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.

Individual are provided the opportunity to consent to specific uses or sharing of PII by submitting DD Form 2870 and request restrictions on the use of the PHI by submitting DD Form 2871.

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

AUTHORITY: 10 USC 8111, Sharing of Department of VA and DoD Healthcare Resources; 10 USC 1104, Sharing of Healthcare Resources with the Department of Veterans Affairs; 38 USC 8111, Sharing of Department Veterans Affairs and Department of Defense Health Care Resources; National Defense Authorization Act (NDAA) 2017, Defense Health Programs; 10 USC 136, Under Secretary of Defense for Personnel and Readiness; 10 USC Chapter 55, Medical and Dental Care; 42 USC Chapter 32, Third Party Liability for Hospital and Medical Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoD Instruction 6025.18, Privacy of Individually Identifiable Health Information in DoD Health Care Programs; DoD Regulation 6025.18-R, DoD Health Information Privacy Regulation; DoD Instruction 6040.45, DoD Health Record Life Cycle Management; DoD Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs).

PURPOSE: To collect information required to provide and document your medical care; determine your eligibility for benefits and entitlements; adjudicate claims; determine third party responsibility for the cost of Military Health System (MHS) provided healthcare and recover that cost; evaluate your fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard; evaluate the MHS and its programs; and perform administrative tasks related to MHS operations and personnel readiness.

ROUTINE USES: Information in your records may be disclosed to: Private physicians and Federal agencies, including the Department of Veterans Affairs, Health and Human Services, and Homeland Security (with regard to members of the Coast Guard), in connection with your medical care; Government agencies to determine your eligibility for benefits and entitlements; Government and non-government third parties to recover the cost of MHS provided care; Public health authorities to document and review occupational and environmental exposure data; and Government and non-government organizations to perform DoD approved research. Information in your records may be used for other lawful reasons which may include teaching, compiling statistical data, and evaluating the care rendered. Use and disclosure of your records outside of DoD may also occur in accordance with 5 USC 552a(b) of the Privacy Act of 1974, as amended.

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 by DoD 6025.18-R. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, and healthcare operations.

DISCLOSURE: Voluntary. Failure to provide the requested information, comprehensive health care services may not be possible, you may experience administrative delays, and you may be rejected for service or an assignment. However, care will not be denied.

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.
- 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.

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 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           |   |

MHS Genesis

**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 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) |  |

**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.dod.mil/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.

The system does not collect and maintain records about an individual where the records is retrieved by the individual's name, number or unique identifier IAW the Privacy Act of 1974, as amended. (Chapter 55 of Title 10 USC, §1071 - 1106.)

**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: 103-14  
DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate).

**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; 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 not from members of the public.