

## 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:**

Defense Occupational and Environmental Health Readiness System – Hearing Conservation (DOEHRS-HC)

**2. DOD COMPONENT NAME:**

Defense Health Agency

**3. PIA APPROVAL DATE:**

### SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

**a. The PII is:** (Check one. Note: foreign nationals are included in general public.)

- |   |   |
|---|---|
| <input type="checkbox"/> From members of the general public   | <input checked="" type="checkbox"/> From Federal employees and/or Federal contractors |
| <input type="checkbox"/> From both members of the general public and Federal employees and/or Federal contractors | <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 Defense Occupational and Environmental Health Readiness System – Hearing Conservation (DOEHRS-HC) is an information system designed to support personal auditory readiness and help prevent hearing loss through early detection. DOEHRS-HC collects, maintains, compares, and reports deployment and hearing conservation program data for Department of Defense (DoD) personnel. DOEHRS-HC is accessed at multiple sites including Military Treatment Facilities (MTFs), theater, and at sea.

DOEHRS-HC collects Personally Identifiable Information (PII) and Protected Health Information (PHI) regarding personal descriptors, medical information, security information, social security number, and duty status information for military personnel and supporting civilian staff (i.e., Active Duty, Reserve, Guard, and civilian staff).

DOEHRS-HC is owned and managed by Defense Health Agency, DADIO (J6), Solution Delivery Division, Clinical Support Program Management Office.

**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 to verify the identification of the patient when they come in for hearing tests.

**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.

Submission of information is voluntary. If an individual chooses not to provide PII/PHI information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

**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 specific uses of their PII/PHI. Audiometric surveillance requires the collection of PII to uniquely identify and track an individual's hearing longitudinally. Consent to the specific uses of PII is obtained as necessary, in accordance with DoD 5400.11-R, DoD Privacy Program, C4.1.3. PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, DoD Health Information Privacy Regulation. Individuals are informed of these uses and are given the opportunity to restrict the use of their PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DoD 6025.18-R, C10.1. For uses other than treatment, payment and healthcare operations, individuals can authorize the use of their PHI by submitting DD Form 2870. For uses other than treatment, payment and healthcare operations, individuals can 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

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

**AUTHORITY:** 10 U.S.C. 1074f, Medical tracking system for members deployed overseas; DoD Directive 6490.02E, Comprehensive Health Surveillance; DoD Instruction 6490.03, Deployment Health; DoD Instruction 6055.12, Hearing Conservation Program (HCP) and E.O. 9397 (SSN), as amended.

**PURPOSE:** To collect hearing related information from you in order to evaluate your ability to hear, determine whether that ability is decreasing, and prevent hearing loss across DoD.

**ROUTINE USES:** Information in your records may be disclosed to private physicians and Federal agencies, including the Departments of Veterans Affairs, Health and Human Services, and Homeland Security in connection with your medical care; other federal, state, and local government agencies to determine your eligibility for benefits and entitlements and for compliance with laws governing public health matters; and government and nongovernment third parties to recover the cost of healthcare provided to you by the Military Health System. For a full listing of the Routine Uses, please refer to the applicable SORN.

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. Permitted uses and disclosures of PHI include, but are not limited to, treatment, payment, healthcare operations, and the containment of certain communicable diseases.

For a full listing of the applicable Routine Uses, refer to the applicable SORN.

**APPLICABLE SORN:** EDHA 07, Military Health Information System (78 FR 69076)<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570672/edha-07/>

**DISCLOSURE:** Voluntary. If you choose not to provide your information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

**h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component?** (Check all that apply)

Within the DoD Component

Specify.

Hearing test results, including PII, is shared with the DoD Hearing Center of Excellence (HCE) to assist the HCE's focus on prevention, diagnosis, mitigation, treatment & rehabilitation of hearing loss & auditory injury.

Other DoD Components

Specify.

DOEHRS-HC retrieves PII from the Defense Manpower Data Center (DMDC) for inquiries into the Defense Enrollment Eligibility Reporting System (DEERS) for patient identification.

The hearing test data is required by the Army Public Health Center (APHC), the Navy ;' & Marine Corp Public Health Center (NMCPHC), and the Air Force Public Center to document the individual hearing ability, assist with local & Service-wide hearing conservation & hearing readiness program management, and monitor hearing readiness & hearing conservation follow-up test requirements.

Other Federal Agencies

Specify.

The hearing test results is shared with the United States Department of Veterans Administration (VA) is to support expeditious processing of benefits applications & disability claims for hearing loss & tinnitus. The data is also used to enhance health care delivery & improve continuity of care for beneficiaries with hearing loss &/or auditory injury.

State and Local Agencies

Specify.

Contractor:  
Concept Plus, LLC.

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.

DOEHRS-HC Tier III contractors are required to sign the DHA CONTRACTOR NON-DISCLOSURE AGREEMENT (NDA). As used in this Agreement, sensitive information is an overarching term that also includes, but is not limited to, sensitive but unclassified information/data, Protected Health Information, For Official Use Only information/data, and Privacy Information.

DOEHRS-HC contractors are also required to sign a Data User Agreement (DUA).

The DOEHR-HC Tier III contract language includes the following:  
DHA PGI 224.1-90 - PERSONALLY IDENTIFIABLE INFORMATION (PII), PROTECTED HEALTH INFORMATION (PHI), AND FEDERAL INFORMATION REQUIREMENTS (REVISED MAY 6, 2015)  
The contractor shall comply with the document entitled, 'Personally Identifiable Information (PII), Protected Health Information (PHI) and Federal Information Requirements,' that can be found at <http://health.mil/Policies/2015/04/09/DHA-Standard-Contract-Language> which is incorporated by reference in its entirety."

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

Defense Enrollment Eligibility Reporting System (DEERS) owned by the Defense Manpower Data Center (DMDC)

**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)

Face-to-Face Contact

Paper

Fax

Telephone Interview

Information Sharing - System to System

Website/E-Form

Other (If Other, enter the information in the box below)

DOEHRS-HC is accessible by authorized, registered users from the Internet at [https://doehrswww.apgea.army.mil/doehrsdr/pub/Confirm\\_input.action](https://doehrswww.apgea.army.mil/doehrsdr/pub/Confirm_input.action). DOEHRS-HC interfaces with the Defense Enrollment Eligibility Reporting System (DEERS). DOEHRS-HC also utilizes forms DD 2215 and DD 2216.

**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.

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

(3) Retention Instructions.

Retention and Destruction: Temporary. Cut off annually and destroy 30 year(s) after the separation/retirement of the service member or termination/retirement civilian personnel (DAA-0330-2013-0004-0001).

**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 U.S.C. 1074f, Medical tracking system for members deployed overseas; DoD Directive 6490.02E, Comprehensive Health Surveillance; DoD Instruction 6490.03, Deployment Health; DoD Instruction 6055.12, Hearing Conservation Program (HCP) and E.O. 9397 (SSN), as amended.

**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.

DOEHRS-HC does not collect information from members of the public.