

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:

Theater Medical Information Program-Joint Composite Health Care System Caché (TC2)

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 type="checkbox"/> From Federal employees and/or Federal contractors |
| <input checked="" 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.

Theater Medical Information Program-Joint Composite Health Care System Caché (TC2) provides military health care providers an environment to access and document inpatient healthcare, ancillary services order-entry, and results retrieval in the military's deployed environment. TC2 delivers an effective, interoperable health care system that mirrors a subset of capabilities from the legacy Composite Health Care System (CHCS) to support the deployed medical business practice.

Data elements include beneficiary information collected and used to support the delivery of health care to TRICARE beneficiaries. In addition, user data is collected to support authentication, authority, and access to TC2.

Personally identifiable information (PII) and protected health information (PHI) is collected to determine eligibility and administer health care delivery services. User data, which contains some PII and PHI, is collected to support administration and clinical practice authorization and access. Clinical patient data is documented and stored in the patient files in TC2. Data is used for patient care management.

The types of personal information about individuals collected in this system include the following: personal descriptors, ethnicity, contact information, identification numbers, life, education, employment, financial, social security number, and health information.

The individuals whose information is stored in this system include active duty military (all services + Coast Guard and Reserve), veterans, dependents, retirees and/or their dependents, contractors, foreign nationals, former spouses, reservist, National Guard personnel, and prisoners of war.

The system is located at deployed Role 3 Military Treatment Facilities close to combat zones where the system is used to support force health protection, casualty care and detainee care. The TC2 application is used on Hospital Ships to support force health protection, casualty care and provide humanitarian assistance. TC2 is accessed at these locations by users affiliated with the Department of Defense Health Agency. TC2 is installed, and managed by the component military service personnel responsible for the Role 3 facility and supported, and owned by the Joint Operational Medical System (JOMIS) Program Management Office (PMO).

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/PHI is collected to administer health care delivery services. PII/PHI is also collected to support the functions of patient contact, the correct identification of patients, patient tracking, etc. User data is collected to support administration and clinical practice authorization and access.

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.

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 Manual (DoDM) 6025.18, Implementation of the HIPAA Privacy Rule in DoD Health Care Programs. 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 DoDM 6025.18.

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.

PII collection is mandatory for US military personnel. However, for other patients choosing to not provide PII, care will not be denied.

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

Patients are requested to sign a Privacy Act Statement (DD Form 2005) that is kept in the Outpatient Record.

This statement serves to inform you of the purpose for collecting personal information required by TC2 and how it will be used.

AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to determine your eligibility, as well as document and administer delivery of health care within the theater environment.

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 non-government 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) is the system of records notice (SORN) for TC2. The SORN can be found at:

<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.

Other DoD Components

Specify.

Army, Navy, Air Force

AHLTA-T is the source system for patient demographics. TC2 Lab Interop (Lab Interop, Lab Sharing with Landstuhl Regional Medical Center), Digital Imaging Network - Picture Archiving and Co (DINPACS (MedWeb)).

To the U. S. Coast Guard (USCG) for USCG beneficiaries treated at DoD MTFs.

Data Exchange occurs between TC2 and individual Service readiness applications, contractor systems providing clinical results, personnel systems, workload management systems, Defense Manpower Data Center (DMDC), other developers and help desk support.

To permit the disclosure of records to the Department of Health and Human Services (HHS) and its components for the purpose of conducting research and analytical projects, and to facilitate collaborative research activities between DoD and HHS.

To federal offices and agencies involved in the documentation and review of defense occupational and environmental exposure data, including the National Security Agency, the Army Corps of Engineers, National Guard, and the Defense Logistics Agency.

To the Congressional Budget Office for projecting costs and workloads associated with DoD medical benefits.

Other Federal Agencies

Specify.

To the Department of Veterans Affairs (DVA) for the purpose of providing medical care to former service members and retirees, to determine the eligibility for or entitlement to benefits, to coordinate cost sharing activities, and to facilitate collaborative research activities between the DoD and DVA.

To the National Research Council, National Academy of Sciences, National Institutes of Health, Joint Pathology Center (JPC), and similar institutions for authorized health research in the interest of the Federal Government and the public. When not essential for longitudinal studies, patient identification data shall be deleted from records used for research studies. Facilities/activities releasing such records shall maintain a list of all such research organizations and an accounting disclosure of records released thereto.

State and Local Agencies

Specify.

To local and state government and agencies for compliance with local laws and regulations governing control of communicable diseases, preventive medicine and safety, child abuse, and other public health and welfare programs.



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.

When access to PII/PHI is required there is a supporting Data Use Agreement (DUA) in place

Vendor handling PII do so in a closed environment to research a trouble ticket. Once done with the analysis the data is destroyed.

Contract number W81XWH-15-0421 (Development Contract) Section 6.4.5 Business Associates states: "The Contractor meets the definition of Business Associate, and DHA meets the definition of a covered entity under the HIPAA Rules and the DoD HIPAA Issuances. Therefore, a Business Associate Agreement (BAA) between the Contractor and DHA is required to comply with the HIPAA Rules and the DoD HIPAA Issuances. This paragraph serves as the required BAA. As a Business Associate, the Contractor shall comply with the HIPAA Rules and the DoD HIPAA Issuances applicable to a business associate performing under this Contract.

FAR privacy clauses 52.212-1, FAR 52.212-3, FAR 52.213-4, and FAR 52.212-5 are included in the contract."

TC2 collects PII during humanitarian operations, from casualties of war, from coalition forces and in support of detainee care. The PII is shared with the host nation and may or not be shared in accordance with established policies for information sharing in each category.



Other (e.g., commercial providers, colleges).

Specify.

PII is collected in accordance with the authorities in DoD Directives 5124.02 and 5136.01 and Sections 401, 404, 407, and 2561 of Title 10, United States Code. DoD Instruction 6200.07 – Delivery of Direct Health Care To Non-Detainee Host Nation (HN) Civilians establishes policy, assigns responsibilities, and provides procedures for DoD personnel engaged in or supporting the delivery of direct health care to HN civilians during military exercises or operations, when authorized and in accordance with DoD Instructions (DoDIs) 2205.02, 3000.05, and 6000.16, or as part of authorized overseas humanitarian, disaster and civic aid activities, in accordance with DoD Directive 5100.46. Foreign military members are entitled to MTF care pursuant to a reciprocal health care or other applicable international agreement (e.g., North Atlantic Treaty Organization [NATO], Partnership for Peace Status of Forces Agreement [PFP SOFA]).

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

Demographic data is collected for use by direct entry into the system by a health care provider/administrator and the system interface with AHLTA-T.

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"/> Face-to-Face Contact | <input checked="" type="checkbox"/> Paper |
| <input checked="" 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) | |

The data is collected from the patient or through scanning the DMDC CAC card by a user of the system. The data may also be collected by AHLTA-T and transmitted to TC2.

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.

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.

Temporary. Cut off upon last episode of patient care or last entry to the patient record is annotated. Delete/Destroy when 75 years old." TC2 is an inter-operable health care system that mirrors a subset of capabilities from the legacy Composite Health Care System (CHCS) to support the deployed medical business practice. Therefore disposition of the records in the system is maintained according to the retention and disposition instructions of the AHLTA / CHCS.

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. Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); DoDI 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs); 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.

DoD Manual 8919.01, Volume 2 DoD Information Collections Manual: Procedures for DoD Public Information Collections Section 8(b)5 states the following are exempt items and not considered public information collections:

"Facts or opinions, obtained initially or in follow-up requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on, or prophylaxis to prevent, a clinical disorder; direct treatment of that disorder; or the interpretation of biological analyses of body fluids, tissues, or other specimens; or the identification or classification of such specimens. This includes medical records established as a result of this type of action."