



PRIVACY IMPACT ASSESSMENT (PIA)

For the

AHLTA-Theater

TRICARE Management Activity

SECTION 1: IS A PIA REQUIRED?

a. Will this Department of Defense (DoD) information system or electronic collection of information (referred to as an "electronic collection" for the purpose of this form) collect, maintain, use, and/or disseminate PII about members of the public, Federal personnel, contractors or foreign nationals employed at U.S. military facilities internationally? Choose one option from the choices below. (Choose (3) for foreign nationals).

- (1) Yes, from members of the general public.
- (2) Yes, from Federal personnel* and/or Federal contractors.
- (3) Yes, from both members of the general public and Federal personnel and/or Federal contractors.
- (4) No

* "Federal personnel" are referred to in the DoD IT Portfolio Repository (DITPR) as "Federal employees."

b. If "No," ensure that DITPR or the authoritative database that updates DITPR is annotated for the reason(s) why a PIA is not required. If the DoD information system or electronic collection is not in DITPR, ensure that the reason(s) are recorded in appropriate documentation.

c. If "Yes," then a PIA is required. Proceed to Section 2.

SECTION 2: PIA SUMMARY INFORMATION

a. Why is this PIA being created or updated? Choose one:

- New DoD Information System New Electronic Collection
- Existing DoD Information System Existing Electronic Collection
- Significantly Modified DoD Information System

b. Is this DoD information system registered in the DITPR or the DoD Secret Internet Protocol Router Network (SIPRNET) IT Registry?

- Yes, DITPR Enter DITPR System Identification Number 164 (TMIP-J)
- Yes, SIPRNET Enter SIPRNET Identification Number
- No

c. Does this DoD information system have an IT investment Unique Project Identifier (UPI), required by section 53 of Office of Management and Budget (OMB) Circular A-11?

- Yes No

If "Yes," enter UPI

UII: 007-000001913 (TMIP-J)

If unsure, consult the Component IT Budget Point of Contact to obtain the UPI.

d. 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 should be consistent.

- Yes No

If "Yes," enter Privacy Act SORN Identifier

DHA 07

DoD Component-assigned designator, not the Federal Register number.
Consult the Component Privacy Office for additional information or
access DoD Privacy Act SORNs at: <http://www.defenselink.mil/privacy/notices/>

or

Date of submission for approval to Defense Privacy Office

Consult the Component Privacy Office for this date.

e. Does this DoD information system or electronic collection have an 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

Enter OMB Control Number

Enter Expiration Date

No

f. Authority to collect information. A Federal law, Executive Order of the President (EO), or DoD requirement must authorize the collection and maintenance of a system of records.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be the same.

(2) 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) Whenever possible, cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If a specific statute or EO does not exist, determine if an indirect statutory authority can be cited. An indirect 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) 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 should be identified.

10 U.S.C. Chapter 55, Medical and Dental Care; 32 C.F.R. 199.17 TRICARE Program; 45 C.F.R. Parts 160 and 164, Health Insurance Portability and Accountability Act Privacy and Security Rules; DoD 6025.18-R, DoD Health Information Privacy Regulation; DoDI 6015.23, Delivery of Healthcare at Military Treatment Facilities; DoDD 6040.37, Confidentiality of Medical Quality Assurance; and, E.O. 9397 (as amended, SSN).

g. Summary of DoD information system or electronic collection. Answers to these questions should be consistent with security guidelines for release of information to the public.

(1) Describe the purpose of this DoD information system or electronic collection and briefly describe the types of personal information about individuals collected in the system.

AHLTA-Theater (AHLTA-T) is a clinical documentation and management application that has been developed and is sustained by the Defense Health Information Management System (DHIMS) for the military theater environment. This application provides instant access to a continuous and coherent chronology of the health care history of each patient and enables the rapid access and transfer of relevant patient information for regional and remote treatment of injuries and illnesses. AHLTA-T maintains a comprehensive, lifelong, computer-based patient record for every beneficiary entitled to DoD military healthcare in theater of operations.

AHLTA-Mobile (AHLTA-M) is a point-of-care handheld medical assistant application, to assist medical personnel—deployed, on military bases, or at military medical centers—with diagnosis and treatment of patients. Medical personnel also use the solution to record patient clinical encounters and transmit those records to a central data repository.

The Theater Medical Information Program Framework (TF) serves as a mediator between various message (or event) publishers and subscribers (i.e., applications). This mediation by TF enables effective integration of heterogeneous applications, whether databases, real-time data sources, resources, applications, medical devices, or mobile devices. The TF provides asynchronous queues for a variety of sources (e.g., network, middleware, and system) and resources (e.g., objects, database, and applications). TF allows data to be shared between disparate applications in an open architecture within the TMIP-J Theater of Operations, Continental United States (CONUS), and outside CONUS (OCONUS) sites.

This system does not host a Web site. Furthermore, the system is not accessible by the public.

AHLTA-T and AHLTA-M collects the following types of personal information about individuals:

Name

Social Security Number (SSN)

Defense Enrollment Eligibility Reporting System (DEERS) Patient ID

Gender

Citizenship

Race/Ethnicity

Birth Date

Home Telephone Number

Religious Preference

Spouse Information

Marital Status

Medical Information

Emergency Contact

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

The data contained in AHLTA-T and AHLTA-M is solely collected from and about Military Health System (MHS) beneficiaries for the purpose of providing health care. In emergency situations, DoD facilities may see members of the general public. The system can accept the existence of a John Doe patient if an individual does not wish to provide PII.

The system point of contact is:

COL Aaron Silver

DHIMS Program Manager

(703) 681-7143

(2) Briefly describe the privacy risks associated with the PII collected and how these risks are addressed to safeguard privacy.

AHLTA-Theater is susceptible to the same privacy risks inherent in any system collecting, using, and sharing PII/PHI. If this system is not properly protected then the PII/PHI contained therein could be accessed by unauthorized individuals through various methods such as data interception, unauthorized access, internal threats, and external threats.

AHLTA-Theater data is encrypted in transit by the TMIP Framework (TF) when transmitted outside the network enclave to protect against data interception. Data transmitted within the enclave is encrypted via Oracle STIG Procedures with Data At Rest. Unauthorized access is mitigated by limiting the access to PII/PHI to trusted individuals only; these individuals have clearance and a "need to know" in order to access data. User and system authentication is addressed by verifying need to know and clearance.

Therefore, all applicable security and privacy processes and regulations (e.g., DoD Information Assurance Certification and Accreditation Process [DIACAP], Health Insurance Portability and Accountability Act [HIPAA], etc.) required of a DoD system in operation have been defined and implemented, reducing risks to the maximum extent possible and to the point that any remaining risk has been accepted by the AHLTA-T Designated Approving Authority (DAA).

h. With whom will the PII be shared through data exchange, both within your DoD Component and outside your Component (e.g., other DoD Components, Federal Agencies)? Indicate all that apply.

Within the DoD Component.

Specify.

Composite Health Care System (CHCS), Clinical Data Repository/Health Data Repository (CHDR), Theater Medical Data Store (TMDS) and Pharmacy Data Transaction Service (PDTs), Clinical Data Mart (CDM), Navy Medicine on Line (NMO), Air Force Complete Immunization Tracking Application (AFCITA), Medical Protection System (MEDPROS), Corporate Dental Application (CDA), Dental Common Access System (DENCAS), Optical Fabrication Automated Management System (OFAMS)

TF transmits data to CDR, Theater Medical Data Store (TMDS), and NMO.

Other DoD Components.

Specify.

Defense Enrollment Eligibility Reporting System (DEERS) is the source system for patient demographics, enrollment, and eligibility data.

Other Federal Agencies.

Specify.

To the Department of Veteran Affairs for the purpose of enabling DoD data retrieval from the Federal/Bi-Directional Health Information Exchange (FHIE/ BHIE) frame-work.

State and Local Agencies.

Specify.

Contractor (Enter name and describe the language in the contract that safeguards PII.)

Specify.

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

Specify.

i. Do individuals have the opportunity to object to the collection of their PII?

Yes

No

(1) If "Yes," describe method by which individuals can object to the collection of PII.

For AHLTA-T and AHLTA-M, submission of information is voluntary. If an individual chooses not to provide their information, no penalty may be imposed, but absence of the requested information may result in administrative delays.

TF is not a data entry application. TF transmits data that is collected using other medical applications.

(2) If "No," state the reason why individuals cannot object.

j. 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.

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.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

The DHIMS Program Office is currently working with the TMA Privacy and Civil Liberties Office to implement the use of the approved the Privacy Act Statement (PAS) set forth below in connection with paper and electronic forms through which an individual directly provides personally identifiable information for this system. At such time as revisions to DD Form 2005 now in process are approved and the revised DD Form is deployed for use in theater, the PAS set forth below will be replaced, in theater, with the new DD Form 2005.

AUTHORITY: 10 U.S.C. Chapter 55, Medical and Dental Care; 32 C.F.R. 199.17 TRICARE Program; and, E.O. 9397 (as amended, SSN).

PURPOSE: To provide automated and integrated functionality to the hospital staff and to facilitate the delivery of health care and military treatment facilities administration. Collected personally identifiable information is solely from MHS beneficiaries, and is used to determine eligibility, administer health care delivery services, and for patient care management.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a (b) of the Privacy Act of 1974, the DoD "Blanket Routine Uses" under 5 U.S.C. 552a (b) (3) apply to this collection. The applicable System of Record Notice further describes disclosures outside DoD, such as disclosures to the Department of Veterans Affairs for the purpose of providing medical care to former Service members, and disclosures to local and state governments and agencies for compliance with laws governing communicable disease control, child abuse and other public health matters. Disclosures do not include individually identifiable health information unless permitted by the HIPAA Privacy Rule and other applicable law.

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.

NOTE:

Sections 1 and 2 above are to be posted to the Component's Web site. Posting of these Sections indicates that the PIA has been reviewed to ensure that appropriate safeguards are in place to protect privacy.

A Component may restrict the publication of Sections 1 and/or 2 if they contain information that would reveal sensitive information or raise security concerns.