



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Designated Provider Health Care Delivery System (DPHCDS)
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TRICARE Management Activity (TMA)
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### **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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

**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
- 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

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

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.

Public Law 104-201 § 722 - 726; 10 U.S.C. 1102, Confidentiality of Medical Quality Assurance Records: Qualified Immunity for Participants; E.O. 9397 (SSN), as amended.

**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.

The purpose of the Designated Provider Health Care Delivery System (DPHCDS) is to provide TRICARE Management Activity (TMA) and the Designated Providers (DPs) with useful beneficiary enrollment and capitation information related to the Uniformed Service Family Health Plan (USFHP). The primary mission of DPHCDS is to provide timely and accurate beneficiary information for eligible and enrolled personnel to the six DPs, TMA, Defense Enrollment Eligibility Reporting System (DEERS), and the TMA Medical Data Repository (MDR). DPHCDS is able to accomplish its mission through the collection and careful analysis of DP beneficiary data on a monthly basis. Additionally, DPHCDS provides secure web portal access to authorized users at TMA and the 6 DP locations. This web portal provides users with need-to-know access to the site's collected and aggregate beneficiary data.

The system has nine main functional areas described below:

- **Monthly Uploads:** This area of the web portal provides the DPs the ability to upload monthly files (pharmacy, medical encounter, provider, other health insurance/primary care manager, and fee files) to the Ingenix Data Warehouse.
- **Monthly Reports:** This area of the web portal allows users (TMA-USFHP Program Office staff and DP USFHP Operations staff) to view and download monthly reports from Ingenix. Report access is controlled by an access level assigned at the time of user's registration. Reports available to view include Monthly Submission Results, Enrollment Reports, Financial Reports, and the Monthly Eligibility File. All reports posted on the portal are created by Ingenix utilizing data stored within the Ingenix Data Warehouse.
- **Daily DEERS Updates:** This area of the web portal allows users access to daily notification reports as well as the ability to search for Policy Notifications (PNTs) from DEERS for their specific facility.
- **Weekly Patient ID (PID) Updates:** This area of the web portal allows users access to PID reports; it also allows them to search for specific PIDs from DEERS for research purposes.
- **Conditional Enrollment:** This area of the web portal allows users to conditionally enroll newborns/adoptee's into the data warehouse for capitated payment purposes. The newborn/adoptee's mother must be enrolled at the specific DP facility performing the transaction for successful conditional enrollment of the newborn/adoptee.
- **Data Warehouse Query Tool:** This area of the web portal allows users insight into their submitted data stored within the Ingenix Data Warehouse including medical and pharmacy encounters, providers, enrollments, and capitation. Access to the modules is controlled by an access level assigned at the time of the user's registration.
- **File Transfer Interface:** This area of the web portal allows users to transmit files to each other securely. This feature is used in lieu of email for documents which may contain sensitive information.
- **Beneficiary Web Enrollment:** This area of the web portal allows users to view enrollment and demographic information which has been updated through the Defense Manpower Data Center (DMDC) Beneficiary Web Enrollment (BWE) application. This area of the DP Portal allows insight into the BWE-related Policy Notifications (PNTs) received from DMDC for each of the DPs as well as any financial information associated with the enrollment (including methods of payment for enrollment fees). Financial data is not retained by the Ingenix Data Warehouse past the 6 day "pending" enrollment window (or once approved by the DP contractor—whichever comes first).
- **Extended Care Health Option (ECHO) Enrollment:** This area of the web portal provides DP level data for ECHO enrollments. ECHO enrollments are reported (when they occur) through daily reporting.

The functional areas of the web portal listed above directly interact with the Ingenix Data Warehouse of

DPHCDS. Data in the form of patient enrollment and demographic changes are provided to each TRICARE contractor on a weekly basis using Weekly Patient IDs (PIDs) and on a daily basis using Policy Notifications (PNTs) from DEERS, the “gold source” of enrollment and eligibility data for the Department of Defense (DoD).

Daily Policy Notification (PNT) reports are remotely printed at five of the six DP locations to their secure DoD Information Assurance Certification and Accreditation Process (DIACAP) locations. Access to and security of printed reports at the six DPs is the responsibility of the DP staff. On a monthly basis, the six DPs send locally gathered medical, provider, fee, and pharmacy data to Apptis, the DP East Data Contract Site. Additionally, DPs send personally identifiable information (PII) via DPHCDS monthly file uploads and DPHCDS maintains bi-directional interfaces with DMDC DEERS. Data sent to Apptis is used by Ingenix in conjunction with DEERS data to run various reports. These reports are then provided to the DPs and TMA via the Apptis DPHCDS web portal.

The following are lists of PII and protected health information (PHI) collected about individuals:

**Enrollment Records:** Electronic files containing beneficiary ID, name, Social Security Number (SSN), date of birth, gender, sponsor status (active duty or retired), relationship to sponsor, sponsor pay grade, sponsor name and SSN, state/country, zip code, and program enrollment information (i.e., date of enrollment, expiration of enrollment, program enrolled in, etc.).

**Management Clinical Data Records:** Electronic files containing Uniformed Services Family Health Plan of the Department of Defense Military Health Services of Managed Care System, System identifier, beneficiary ID, name, SSN, other demographics (i.e., county, state, zip code, coverage area for Uniformed Services Family Health Plan, healthcare services, healthcare provider, and financial information (e.g., Diagnosis-Related Groups and uniformed service beneficiaries cost share).

**Medicare Claims Records:** Electronic files containing claim identifiers, beneficiary ID, county, state, zip code, healthcare services, healthcare provider, and cost of healthcare and procedure retained for two years for analysis of cost trends.

Staff members/web portal users are located at the below DP sites as well as the TMA Program Offices in Falls Church, VA and Aurora, CO and DPHCDS contractor staff (developers, analysts, administrators, etc.) in Chantilly, VA and Eden Prairie, MN. Designated Provider Management Office Sites include: Martin's Point Health Care, 331 Veranda Street, Portland, ME 04103-5040; Brighton Marine Health Center, 77 Warren Street, Boston, MA 02135-9862; St. Vincent Catholic Medical Centers of New York, 450 West 33rd Street, New York, NY 10001-2603; Johns Hopkins Medical Services Corporation, 6704 Curtis Court, Glen Burnie, MD 21060-6406; CHRISTUS Health, 2600 North Loop West, Houston, TX 77092-8914; Pacific Medical Clinics, 1200 12th Avenue South, Seattle, WA 98144-2790.

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

DPHCDS has an active Authority to Operate (ATO) at the current DefenseWeb subcontractor location (DP West) and is in the process of obtaining an ATO at the new Apptis (DP East) location. DPHCDS maintains compliance with all applicable Information Assurance Vulnerability Messages (IAVMs) as well as with all DoD/Defense Information Systems Agency (DISA) guidelines for a MAC III Sensitive system. DPHCDS provides protection of PII with fully encrypted databases, a secure Virtual Private Network (VPN) tunnel which requires two-factor authentication for login, Intrusion Detection Systems (IDS), role-based user access, detailed security policies and procedures, as well as adherence to TMA personnel, physical, and system security guidelines. All team members are required to undergo annual Information Assurance (IA), Health Insurance Portability and Accountability Act of 1996 (HIPAA), and Privacy Act training through the Military Health System (MHS) Learn training portal. All risks from an end-user perspective are mitigated through policies and procedures at each of the DP locations as well as their own respective ATOs and security accreditations.

**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. Defense Health Services & Systems (DHSS), Military Health System Data Repository (MDR)

**Other DoD Components.**

Specify. Defense Manpower Data Center (DMDC) Defense Enrollment Eligibility Reporting System (DEERS)

**Other Federal Agencies.**

Specify.

**State and Local Agencies.**

Specify.

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

Specify. Designated Provider Data Contract Sites:  
  
Apttis, Inc., 4800 Westfields Boulevard, Chantilly, VA 20151.  
  
Subcontractors: Ingenix, 12125 Technology Drive, Eden Prairie, MN 55344-7302.  
  
Designated Provider Management Office Sites: Martin's Point Health Care, 331 Veranda Street, Portland, ME 04104-5040; Brighton Marine Health Center, 77 Warren Street, Boston, MA 02135-9862; St. Vincent Catholic Medical Centers of New York, 450 West 33rd Street, New York, NY 10001-2603; Johns Hopkins Medical Services Corporation, 6704 Curtis Court, Glen Burnie, MD 21060-6406; CHRISTUS Health, 2707 North Loop West, Houston, TX 77008; Pacific Medical Clinics, 1200 12th Avenue South, Seattle, WA 98144-2790.  
  
To administer the Uniformed Services Family Health Plan of the Department of Defense Military Health Services of Managed Care System the contractor shall comply with the HIPAA (P.L. 104-191) requirements, specifically the administrative simplification provisions of the law and the associated rules and regulations published by the Secretary of Health and Human Services (HHS) and the published TMA implementation directions. This includes the Standards for Electronic Transactions, the Standards for Privacy of Personal Health Information and the Security Standards. It is expected that the contractor comply with all HIPAA-related rules and regulations as they are published and as TMA requirements are defined (including identifiers for providers, employers, health plans, and individuals, and standards for claims attachment transactions).

**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.

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

DPHCDS is not the initial point of collection of PII from individuals; therefore individuals do not have the opportunity to object to the collection of their PII. The DP sites as well as DEERS Service Office (DSO) locations collect PII at the point of care, at which individuals are given the opportunity to object. On a monthly basis, the six DPs send locally gathered medical claims, provider data, Other Health Insurance (OHI), enrollment fee data, and pharmacy claims for their respective beneficiaries to DPHCDS. This data transfer is conducted by an authorized user through a secure VPN tunnel managed by DPHCDS administrators and within the DIACAP boundary of both DPHCDS and the DP sites. The data received in the transfer is then processed in conjunction with DEERS data to run various reports.

**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.

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

DPHCDS is not the initial point of collection of PII from individuals; therefore individuals do not have the opportunity to consent to the specific uses of their PII. The DP sites as well as DSO locations collect PII at the point of care, at which individuals are given the opportunity to consent. On a monthly basis, the six DPs send locally gathered medical claims, provider data, Other Health Insurance (OHI), enrollment fee data, and pharmacy claims for their respective beneficiaries to DPHCDS. This data transfer is conducted by an authorized user through a secure VPN tunnel managed by DPHCDS administrators and within the DIACAP boundary of both DPHCDS and the DP sites. The data received in the transfer is then processed in conjunction with DEERS data to run various reports.

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

- Privacy Act Statement                       Privacy Advisory  
 Other     None

Describe each applicable format.

DPHCDS is not the initial point of collection of PII from individuals; therefore no privacy act statement or privacy advisory is needed. The DP sites as well as DSO locations collect PII at the point of care.



**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.**