



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Healthcare Artifact and Imaging Management Solution (HAIMS)

Defense Health Information Management Systems (DHIMS)

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.

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

MHS Beneficiaries

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.

5 U.S.C. 301, (Department Regulation); 10 U.S.C. §§1071-1085 (Medical and Dental Care); 10 U.S.C. §1086 (Contracts for Health Benefits and Certain Members, Former Members, and Their Dependents); 10 U.S.C. §1095 (Collection from Third Party Payers Act); 10 U.S.C. §1097a and §1097b (TRICARE Prime and TRICARE Standard/Extra Program); 42 U.S.C. §§11131-11152 (Reporting of Information); 45 C.F.R. Parts 160, 162, and 164 (Health Insurance Portability and Accountability Act (HIPAA) Rules); DoDI 6015.23 (Delivery of Healthcare at Military Treatment Facilities (MTFs); and, E.O. 9397 (as amended, for SSN collection).

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.

Healthcare Artifacts and Images Management Solution (HAIMS) is a strategic project, owned and operated by Defense Health Information Management System (DHIMS), that will provide significant “new” informational capabilities to the Military Health System (MHS). The categories of the Individuals covered by the system include: dependents, retirees and/or their dependents, active duty, former spouses, reservist, and the National Guard personnel. HAIMS is a commercial off-the-shelf/government off-the-shelf (COTS/GOTS) based federated architecture that provides access to Artifacts and Images (A&I) where needed, leverages standards for interoperability with existing and future systems, and is based on extensive real world understanding and experience supporting the MHS mission. HAIMS will provide awareness and access to artifacts and images (e.g. photographs, x-rays, video, etc.) from the Electronic Health Record (EHR). These artifacts and images may come from other sources such as the Department of Veteran Affairs (VA) and the Department of Defense (DoD) Picture Archiving Communication Systems (PACS), or may be stored within the HAIMS repository. HAIMS benefits spans the continuum of care, DoD theater of operations to sustaining base to the VA.

HAIMS addresses patient information that is composed of many disconnected islands of information and are numerous repositories of A&I. HAIMS addresses needs that:

- Lack global standards which prevent interoperability across organizations, heterogeneous systems and technologies force information into narrow isolated silos.
- Lack access to prior imaging studies that may require new imaging studies be ordered, resulting in an inconvenience to patients – subjecting them to additional unnecessary and potentially dangerous radiation exposure.
- Lack electronic access to healthcare documentation from paper medical records which has an adverse impact on individual medical readiness, quality of care, efficiency of operations in the MHS, and slows access to service-connect healthcare and benefits determination for veterans seeking support from the VA.

HAIMS decreases repeat studies which increase cost to health care systems and can result in delays in treatment to the War Fighter, other service members, veterans and their dependents. HAIMS also addresses problems that involve the current practice of embedding images into larger encounters which limits system performance in EHR.

HAIMS resolves these problems by:

1. Providing global awareness and access by clinicians to all patient A&I.
2. Providing awareness and access by clinicians to all radiological A&I Global access.
3. Providing support for medical specialists who uses images and for low-density specialists who provide remote support services to clinician who provide direct patient care.
4. Enabling VA and DoD clinicians to view their shared patient’s images acquired by either agency.
5. Associating A&I to the “correct” beneficiary or (patient) medical record.
6. Registering all A&I into one location.
7. Creating an electronic document management system for A&I.
8. Providing a Web based solution for accessing A&I.
9. Creating enterprise A&I storage repositories.
10. Allowing A&I to be available throughout the continuum of care from Theater to sustaining base to VA.

The list below is the information we currently plan to capture for patients and providers. This metadata is drawn from the essential requirements of Clinical Document Architecture (CDA), Cross Community Access (XCA), Digital Imaging and Communication in Medicine (DICOM) and MHS specific requirements.

- . Unique Patient Identifier
- . Electronic Data Interchange Patient Number (EDIPN-DEERS ID)
- . External Person Identification
- . Name

- Gender
- Date of Birth
- Ethnicity
- Race
- Patient Category
- Insurance Status
- Address
- Telecom
- Primary Care Manager ID
- Relationship to Sponsor
- Sponsor Unique Patient Identifier
- Sponsor EDIPN (DEERS ID)
- Status
- Rank/Grade
- Department/Service
- Organization
- Role
- Specialty

System Contact Information: Project Manager, Health IT, Defense Health Information Management System (DHIMS), 703-681-6922

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

Three potential privacy risks are being mitigated in the design of HAIMS:

- Unauthorized Access
- Inaccurate information
- Unauthorized disclosure

In response to the risk of unauthorized access, to personally identifiable information (PII)/protected health information (PHI) within HAIMS, the system will contain warning banners in accordance with DoD regulations. Physical, technical, and administrative safeguards are in place to ensure only authorized personnel that demonstrate "need to know" can access information contained within HAIMS.

In response to the risk of inaccurate information in HAIMS, the system correlates information from authoritative sources only. HAIMS manages persistent objects released for patient care. Where inaccuracies are identified, A&I are replaced and the corrected A&I is then available. In response to the risk presented by unauthorized disclosure of PII/PHI, DoD and the MHS requires that users receive information assurance and HIPAA training annually.

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.

Other DoD Components.

Specify.

Other Federal Agencies.

Specify.

State and Local Agencies.

Specify.

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

Specify.

Current contractor is Evolvent Technologies. Contract contains Business Associate Agreement (BAA) which states: "In accordance with DoD 6025.18-R "Department of Defense Health Information Privacy Regulation," January 24, 2003, the Contractor meets the definition of Business Associate. Therefore, a Business Associate Agreement is required to comply with both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security regulations. This clause serves as that agreement whereby the Contractor agrees to abide by all applicable HIPAA Privacy and Security requirements regarding health information as defined in this clause, and in DoD 6025.18-R and DoD 8580.02-R, as amended." Furthermore, the BAA states: "The Contractor agrees to use administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic protected health information that it creates, receives, maintains, or transmits in the execution of this Contract."

MTF personnel with the appropriate level of certification will be granted access as a result of a National Agency Check with Written Inquires (NACI) or DoD- determined equivalent investigation and personnel on a need to know basis.

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.

Submission of information is voluntary. If an individual wanted to object to their PII/PHI being collected, they would do that at the point of data collection by signing the form DD 2871, "Request to Restrict Medical or Dental Information". HAIMS will be pulling already existing data and PII/PHI as provided by other systems. HAIMS is not a point of service system and isn't originating any documents. HAIMS will allow a provider to import new PII/PHI from A&I that were created outside of HAIMS.

(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.

A process is in place for individuals to access, question, and correct their information in the system through the Privacy Act System of Records Notice (SORN) published in the Federal Register. The SORN provides individuals with the information on how to review/access their PII/PHI.

HAIMS is not a point of service system and it isn't originating any documents. HAIMS will allow a provider to import new PII/PHI from A&I that were created outside of HAIMS. HAIMS will also be pulling already existing data and PII/PHI as provided by other systems. If an individual wanted to object to their PII/PHI being used, they would do so at the point of data collection by signing form DD 2870, "Authorization for Disclosure of Medical or Dental Information".

(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.

- Privacy Act Statement**
- Privacy Advisory**
- Other**
- None**

Describe each applicable format.

N/A- HAIMS will not be collecting PII/PHI from individuals, only pulling it from other sources and systems.