



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Medical Evaluation Board Information Technology Initiative (MEB ITI)
TRICARE Management Activity (TMA)

### **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.

10 U.S.C. 1071-1085, Medical and Dental Care; 42 U.S.C. Chapter 117, Sections 11131-11152, Reporting of Information; 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; DoDD 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; 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.

Medical Evaluation Board Information Technology Initiative (MEB ITI) supports all three Services. It provides them with a documentation and tracking tool for managing possible disabled soldier cases. The system will collect personal information, from the active-duty member, such as: name, gender, race, home address, unit assigned, telephone numbers, SSN, date of birth, and medical history.

The MEB ITI application will provide a web-enabled user interface to support the data collection, monitoring, and reporting activities of the MEB ITI. The MEB ITI User Interface (UI) will provide a uniform procedure and an integrated platform through which various factors involved in the care of a service member may work corroboratively to provide for the evaluation of a service member's medical condition and ability to continue his or her military service. The four elements that constitute the MEB ITI are: 1) tracking the medical evaluation and appellate review; 2) tracking the physical disability evaluation and appellate review; 3) tracking the counseling throughout both the medical and physical evaluation phases; and 4) tracking the final disposition. The MEB ITI UI will directly support the activities and documents leading up to the Medical Evaluation Board (MEB) review, and will indirectly support the physical disability evaluation portion of the process via tracking notes. The MEB ITI UI will provide, at a minimum, the following capabilities:

- Provide users the ability to create a MEB ITI case file for a patient, import demographic data for the patient from correlating data through authoritative feeds, such as DEERS through the Clinical Data Repository (CDR), and enter additional demographic data.
- Provide users the ability to create a MEB ITI case file for a patient, import demographic data for the patient from correlating data through authoritative feeds, such as Defense Enrollment Eligibility Reporting System (DEERS) through the Clinical Data Repository (CDR), and enter additional demographic data.
- Provide users the ability to fill-out the VA 21-0819 and Narrative Summary forms electronically. Where appropriate, these forms will be pre-populated with pertinent demographic data. For example, the VA 21-0819 will be pre-populated with the service member's demographic data as well as the unfitting conditions contained in the referral to MEB ITI. Both forms will allow users to add additional information.
- Provide users the ability to track scheduled medical examinations completed in Composite Health Care System (CHCS) and Compensation and Pension Record Interchange (CAPRI).
- Enable users to enter MEB ITI Tracking Notes in each patient MEB ITI Case File which capture the name of the note's author, the event or activity being tracked, the date for the scheduled completion of activity, and the date of the activity's actual completion.
- Provide a MEB ITI Case Dashboard on which a user can view activities assigned, activities due, and activities and events completed from the dates assigned on MEB ITI tracking notes.
- Display a roster of patient MEB ITI Case files in the MEB ITI application, with the ability to filter results by various criteria and save sets of specific filter criteria as "views" within the MEB ITI UI.
- Enable users to retrieve an individual MEB ITI record by selecting the individual patient MEB ITI record within the roster.
- Provide users with the ability to send and view notifications pertaining to MEB ITI cases.
- Allow for MEB ITI cases to be assigned and/or unassigned to a Physical Evaluation Board Liaison Officer (PEBLO).
- Allow for viewing the following information related to a patient:
  - Appointments
  - Encounters
  - Referrals
  - Problem list
  - Allergies
  - Completed Ancillary Reports (Radiology, Laboratory, and Pharmacy)

Program Name = Defense Health Information Management System

POC Title = Project Lead/COR

Telephone Number = 703-681-7150

Business Address = 5113 Leesburg Pike Suite 701, Falls Church, Virginia 22041

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

Misuse of data (including Identity theft, blackmail and public embarrassment), unauthorized disclosure of data, and unauthorized modification or destruction of MEB ITI sensitive data are risks associated with the Personally Identifiable Information (PII) and Protected Health Information (PHI) collected by this system. These risks are addressed by the use of smart cards for validation and authentication required to access the system, assigned roles to determine access to data, Advanced Encryption Standards (AES), encryption of data at rest and in transit, and finally role-based security, which ensures that access to the information in the system is limited by job requirement and authorization to view the data.

Records are maintained in a secure, limited access, or monitored area. Physical entry by unauthorized persons is restricted by the use of locks, guards, or administrative procedures. Access to personal information is limited to those who require the records to perform their official duties. MEB ITI users will be authenticated using CAC cards and their access to data limited by their assigned roles within the MEB ITI application. All personnel whose official duties require access to the information are trained in the proper safeguarding and use of the information.

**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.

**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.

Individual's PII/PHI is required to provide care and treatment needed by the individual. Additionally the information provided by the system is required for the Physical Evaluation Board Liaison Officer (PEBLO) to successfully accomplish their mission. Initial consent occurs prior to the collection of information however an individual's objection to the collection of PII/PHI would severely hinder the evaluation process.

\_\_\_\_\_

(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.

When an individual is entered into the MEB ITI system they are asked to acknowledge their participation in the MEB ITI process which includes the sharing of information with authorized MEB ITI system users. Again, an individual's objection to the collection of PII/PHI would severely hinder the evaluation process.

PII/PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, DoD Health Information Privacy Regulation.

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

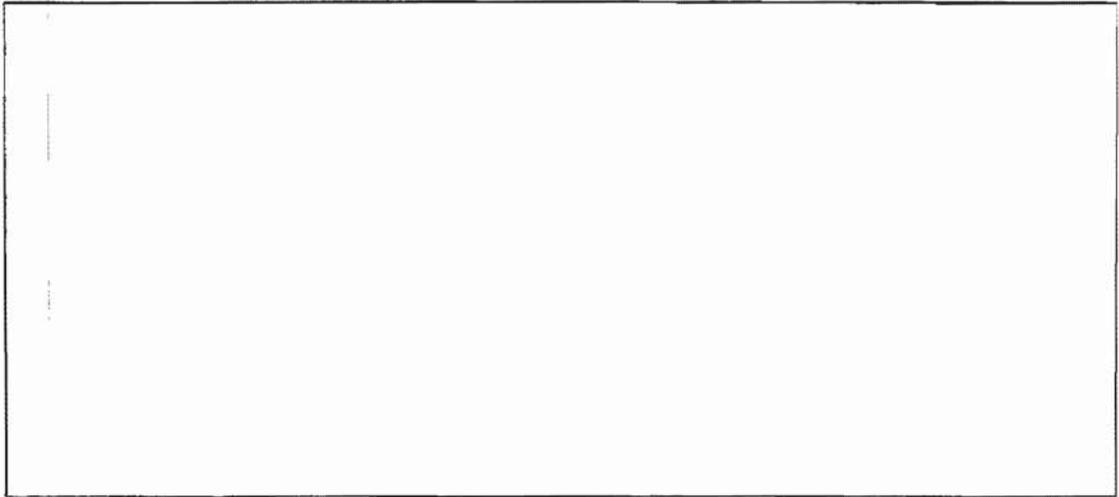
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**k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.**

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

Describe each applicable format.

A Privacy Act Statement is presented to individuals prior to beginning the MEB ITI process and prior to their PII/PHI being collected.



**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.**