



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Neuro-Cognitive Assessment Tool

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.

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.

Current record source is an Army program called "Army Neurological Assessment Metric (ANAM)," covered by Army system of records notice A0040-66b-DASG. This notice will be replaced by new TMA system notice currently in development to cover the NCAT activity.

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 Prime and TRICARE Program); 45 C.F.R. Parts 160 and 164, Health Insurance Portability and Accountability Act Privacy and Security Rules; DoDD 3216.2, Protection of Human Subjects in Research; 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.

Neurocognitive Assessment Tool (NCAT) supports all three Services. It provides them with a neurocognitive assessment to gather patient cognitive performance information that can be used in evaluating treatment of Traumatic Brain Injury (TBI) and further Psychological Health (PH) care. 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.

Program Name = Defense Health Information Management System
POC Title = Project Lead/COR, DeLois Klemm
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.

Identity theft, blackmail and public embarrassment are some of the risk associated with the Personally Identifiable Information (PII) and Protected Health Information (PHI) collected by this system. These risks are addressed by the use of strong passwords or smart cards used to access the system, 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.

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.

Initial consent occurs prior to the set up of NCAT testing. Individuals are alerted by test proctors of the demographics data collection. A second consent opportunity is provided by clicking the "Save" button on the NCAT demographics collection screen presented to the tested individuals. However, to successfully proceed into the NCAT test process, individuals must provide consent and the First Name, Last Name, SSN, Date of Birth and Gender information must be recorded by clicking "Save."

(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.

The information collected is used for the specific purposes of evaluating treatment of TBI and providing feedback on further psychological health care. PII/PHI is only used and disclosed as permitted by DoD 6025.18-R. Individuals are alerted to the voluntary nature of providing their PHI. To successfully proceed into the NCAT test process, individuals must sign a form that complies with section C5.2 and C5.3 of DoD 6025.18-R. Choosing to sign or not sign this form gives individuals the opportunity to give or withhold consent to providing their PHI.

(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.

A Privacy Act Statement is presented to individuals prior to beginning the NCAT testing 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.