PRIVACY IMPACT ASSESSMENT (PIA)

For the

Defense Occupational & Environmental Health Readiness System - Hearing Conservation (DOEHRS-HC)
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**
- ☐ **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: 1227
- ☐ **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 077-97-01-15-02-0079-00

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. § 1074f (Medical tracking system for members deployed overseas); 29 C.F.R. § 1910.1020 (Access to employee exposure and medical records); 29 C.F.R. § 1910.95 (Occupational noise exposure); 45 C.F.R. 160, 164 A and E (Health Information Portability and Accountability Act); DoD Directive 4715.1E, Environment, Safety, and Occupational Health (ESOH); DoD Directive 6490.02E Sec 4.4 (health surveillance systems); DoD Directive 6490.02E, Sec. 5.4, 3.5.2 and 5.6.3 (responsibilities to assemble and archive surveillance data and reports); DoD Instruction 6490.03, E4.A2.7 (Documentation of OEH Monitoring Data); DoD Instruction 6055.1, Sec. 4.1 (DoD Safety and Occupational Health (SOH) Program); DoD Instruction 6055.12 (DoD Hearing Conservation Program (HCP), March 5, 2004); and E. O. 9397 as amended Nov. 2008 (Federal agency use of SSNs).

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.

DOEHRS-HC captures, processes, and transfers data pertaining to the occupational exposure of military personnel to noise. The system consists of over 800 individual, stand-alone sites at military treatment facilities (MTF), which are operated under a centralized management capability of the DOEHRS Project Office (PO).

DOEHRS-HC captures test results from audiometric tests and audiometer software, analyzes the test results, and determines whether a significant hearing loss exists, or if changes in an individual's hearing have occurred. DOEHRS-HC is designed to collect, maintain, compare, and report Hearing Conservation Program (HCP) data within the DoD. The system is also used for medical surveillance, diagnostic evaluation, and management of auditory pathology, referral of hearing loss illness, and auditory readiness outcomes. It supports Occupational Medicine (OM) programs within the Military Health System (MHS) of the Department of Defense (DoD) Health Affairs (HA), Defense Health Services Systems (DHSS). The DOEHRS-Data Repository (DR) module is the corporate data repository of DOEHRS-HC data. DOEHRS-DR is used by DoD occupational and environmental health professionals. It is distributed across Army, Navy, Air Force, and National Guard facilities to query, analyze, abstract, and report information about individual exposures to hazards in the workplace.

The system interface with the data repository at the Technical Integration Office (TIO), Aberdeen, MD is via the Internet. The data repository at the TIO is accessible via the Internet to authorized users at multiple DoD sites that conduct hearing tests. The DOEHRS-HC site is at https://doehrswww.apgea.army.mil/doehrsdr/. This web site is publicly accessible on the Internet, but only authorized users may login to the web site.

Personally identifiable information (PII) collected by DOEHRS-HC includes name, social security number, date of birth, gender, and employment location.

System point of contact:
DOEHRS Technical Manager
Defense Health Services Systems
5111 Leesburg Pike, Suite 810
Falls Church, VA 22041-3200

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

It is possible that a user may inadvertently or intentionally disclose PII to an unauthorized user. Users are required to take training for Privacy Act and HIPAA requirements. Role-based security is in place to allow only appropriate users to access data. Risks regarding the collection, use and sharing of PII in the system have been minimized through system design and implementation of various administrative, technical, and physical security controls.

In addition, SORN amendments are in progress and will be submitted to the Defense Privacy Office for transmittal to the Federal Register within 120 days.

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.

Submission of information, including personal medical information, is completely voluntary, and the individual may choose to object. If however the individual agrees, any information collected will not be used to identify or be linked to the individual in any way. Any uses and disclosures will be for the express and limited purpose of record-keeping processes necessary for identifying potential exposures and mitigation of noise hazards in the workplace; and, available only to those individuals with a bona-fide need to know in the performance of their duties (and consistent with proper training).

(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.

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

Once there is a decision to participate, the uses provided are for record keeping and mitigation; and, as per the the answer in letter "i" above, the uses/disclosures are narrow and specific and observe HIPAA considerations and concepts (e.g., "minimum necessary," and "need-to-know"); and, of course, individuals can choose not to participate (voluntary).

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 (PAS) is given to individuals from whom the PII is collected by a DOEHRS-HC technician. Blanket PAS, DD Form 2005 is used for DD Forms 2215 and 2216. The PAS is currently being revised.