PRIVACY IMPACT ASSESSMENT (PIA)

For the

International SOS (Intl.SOS) Enrollment Image Management System (EIMS)
Defense Health Agency (DHA) / Managed Care Support Contractor (MCSC)

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
- ☐ **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 EDTMA 04

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. Chapter 55, Medical and Dental Care; 38 U.S.C. Chapter 17, Hospital, Nursing Home, Domiciliary, and Medical Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); and 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.

Enrollment Image Management System (EIMS) is used to support the enrollment functions for the TRICARE Overseas Program (TOP). The primary purpose of this system is to:

1. Have a central repository for all enrollment and disenrollment forms available to TRICARE Prime, TRICARE Prime Remote, and other overseas beneficiaries.

2. Provide staff processing the forms the ability to assign work to other TRICARE Service Centers (TSCs) for workload balancing.

Any service member or beneficiary who enrolls or disenrolls in TOP will have a form captured in this system. Enrollments and disenrollments are processed at a TSC using the following forms:

• DD Form 2876, “TRICARE Prime Enrollment Application And Primary Care Manager (PCM) Change Form”
• DD Form 2877, “TRICARE Prime Disenrollment Application”
• DD Form 2896-1, “Reserve Component Health Coverage Request"
• DD Form 2947, “TRICARE Young Adult Application”

These forms are made available to beneficiaries in various ways, including the TRICARE beneficiaries forms web portal (http://tricare.mil/mybenefit/Forms.do#TPR) and by contacting a customer service representative who would send the form(s) over encrypted e-mail. DD Form 2896-1 must be completed via the Defense Manpower Data Center (DMDC) Reserve Component Purchased TRICARE Application (RCPTA). Once on this web application, an eligible individual fills out the application online, prints, and signs the completed DD Form. The form may then be submitted to International SOS (Intl.SOS) staff via fax or mail.

The staff at TSCs may receive forms from beneficiaries by mail, fax, over encrypted e-mail, and in person. TSC staff then scan the completed forms into EIMS. Once the forms are scanned, certain data elements are manually input into the system for form retrieval purposes only. Forms are then reviewed and manually entered into the Defense Eligibility Enrollment Reporting System (DEERS) Online Enrollment System (DOES) web application.

The benefit of EIMS is that it provides global system users with a central form repository and the capability to assign work to local TSCs. EIMS greatly reduces form processing times and improves administrative efficiency.

Personally identifiable information (PII) and protected health information (PHI) collected in this system include:

Personal descriptors, ID numbers, health information, financial information and life information.

Intl.SOS is the primary owner and operator of EIMS. The system will also be used by Intl.SOS’ subcontractor, Leidos (formerly MEDPROTECT).

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

This system strictly operates within a National Institutes of Standards and Technology (NIST) compliant environment and does not interact with or share terminals / computers with systems inside or outside of the controlled environment. The system is monitored as part of the NIST security protocols.

**********Comment from the SIAO**********
As part of the contract, the Contracting Officer has signed off on the NIST security controls.
Therefore, the SIAO signature is not needed.

********** END OF COMMENT **********

If a risk is identified, the Global Quality Support Team will review it with the Operations Management Team to determine a course of action. If there is a pattern of consistent issues with personnel managing and protecting PII / PHI, the staff member's position will be evaluated by management, Human Resources (HR) and the Privacy Officer.

Intl.SOS, in collaboration with Leidos, put in place the following checkpoints to mitigate privacy risks:

• Only authorized staff who meet appropriate clearance (variable by country) are allowed to utilize EIMS.

• Intl.SOS and Leidos users only access the system for the purpose of processing enrollments or researching enrollment information.

• Information is only entered and stored in this system, not used for other purposes.

• User activity is tracked in the system daily with audit logs.

• All personnel are required to attend annual HIPAA and privacy trainings.

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. TRICARE Service Centers (TSCs)

☒ **Other DoD Components.**

Specify. DEERS Online Enrollment System (DOES)

☐ **Other Federal Agencies.**

Specify.

☐ **State and Local Agencies.**

Specify.

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

Specify. Leidos, Inc.

The subcontract with Leidos contains language which requires the contractor to comply with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule and the HIPAA Security Rule. In addition, the contractor is required to comply with the Privacy Act of 1974, as amended.

☐ **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.

Individuals may object to completing any of the DD forms collected by EIMS; however, their enrollment or disenrollment form will not be processed without this information.

(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.

Individuals consent to the specific uses of their PII by reading the Privacy Act Statement, which is available on the first page of all the DD forms which collect information for EIMS. There is no other intended use of the PII collected other than for processing enrollments.

PHI is collected for permitted uses and disclosures as set forth in DoD 6025.18-R, “DoD Health Information Privacy Regulation.” Individuals are informed of these uses and are given the opportunity to restrict the use of their PHI based on the procedures in place at the local facility where the data is collected and maintained, in accordance with DOD 6025.18-R.

(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: PII is collected in EIMS for enrollment and disenrollment purposes using DD Form 2876 (TRICARE Prime Enrollment Application and Primary Care Manager (PCM) Change Form), DD Form 2877

applicable format.	(TRICARE Prime Disenrollment Request), DD Form 2896-1 (Reserve Component Health Coverage Request), and DD Form 2947 (TRICARE Young Adult Application). These forms are made available by DHA and Intl.SOS in either paper or electronic (PDF) format. PII from these DD Forms is entered into EIMS and these are the only forms used by Intl.SOS to capture enrollment and disenrollment information in EIMS. The DD Forms, which are used by all DHA Managed Care Support Contractors (MCSCs), have their own Privacy Act Statements (PAS) in them. EIMS is a system of records that collects personally identifiable information (PII) from individuals via completed forms. Each form entered into EIMS has a Privacy Act Statement (PAS) that is not inconsistent with the SORN. Therefore, no further PAS is required.

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.