

PRIVACY IMPACT ASSESSMENT (PIA)

PRESCRIBING AUTHORITY: DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:

MagView Mammography Information System (MMIS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

12/01/23

Fort Belvoir Community Hospital (FBCH)

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

From members of the general public

From Federal employees

from both members of the general public and Federal employees

Not Collected (if checked proceed to Section 4)

b. The PII is in a: (Check one.)

New DoD Information System

New Electronic Collection

Existing DoD Information System

Existing Electronic Collection

Significantly Modified DoD Information System

c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.

MagView Mammography Information System (MMIS) is a commercial-off-the-shelf (COTS) product. The Magview information software is an automated workflow efficiency tool used for mammography practice. The software aims to improve patient intake, patient follow up and tracking, technologist workflow, patient exam, radiologist reporting, outcomes in accuracy and tracking. The program allows all patient information to be housed and available in one system, allowing the staff user to have access to all details during any stage of the workflow. The Mammography Information Management System allows users to automate reporting, tracking, notification, recall, and quality assurance (QA) functions for breast imaging patients.

Additionally, this solution creates QA reports consistent with the Mammography Quality Standards Act (MQSA). MMIS does not utilize any mobile applications. Clinical and Administrative information is transmitted to the MMIS Application Server via HL7 from the AGFA Connectivity Manager.

Personally Identifiable information (PII) and protected health information (PHI) are accessible only by clinicians who have the capability to generate hard copy reports and images containing private data as well as transmit and receive private data via a wired network connection. Patient PII is received through the HL7 message received from the composite health care system (CHCS) and is encrypted in the database. All access to the system is managed, overseen, and monitored by the system administrator (Radiology PACS Team). Identifier types collected by MMIS include the individual's demographic and medical information.

The PII is from general public, such as, Armed Forces members, family members, retirees, and patients eligible for care.

MagView Mammography Information System is DHA owned and operated.

d. Why is the PII collected and/or what is the intended use of the PII? (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

PII is collected for the purposes of patient identification. The intended use of PII is to distinguish, track, and deliver timely and effective patient care. In addition, intended uses of PII include treatment, payment, and healthcare operations.

e. Do individuals have the opportunity to object to the collection of their PII? Yes No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

Individuals have the opportunity to object to the collection of their PII during their visit. The patient's signature on DD Form 2005 Privacy Act Statement functions as a receipt and acknowledgment that he/she has been informed of the hospital's privacy policies and patient rights under federal privacy and HIPAA laws. If a patient chooses not to provide the requested information comprehensive health care services

may not be possible, the patient may experience administrative delays, and may be rejected for service or an assignment. However, care will not be denied. Patient PII is received on the Magview server through an HL7 message received from the Composite Health Care System (CHCS).

f. 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.

The DHA publication "MHS Notice of Privacy Practices," which is disseminated to patients at FBCH reception areas, states that individuals may exercise their rights to inspect, copy, restrict, and amend their PII/PHI in MHS records. The notice itemizes the types of uses and disclosures that are permissible with and without the patient's authorization. If the patient wishes to consent to specific uses or sharing of PII, the individual may submit a written request to the DHA Privacy and Civil Liberties Office, or the FBCH HIPAA Privacy Officer. The DHA and FBCH addresses are provided, as well as the FBCH HIPAA Privacy Officer's phone number. If an individual chooses not to consent to the specific use of their PII, comprehensive health care services may not be possible, the patient may experience administrative delays, and may be rejected for service or an assignment. PII is received on the Magview server through an HL7 message received from the Composite Health Care System.

g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided. (Check as appropriate and provide the actual wording.)

Privacy Act Statement Privacy Advisory Not Applicable

This statement serves to inform you of the purpose of collecting personal information required by the MMIS system and how it will be used.

AUTHORITY: Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 10 U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. 42 U.S.C. Ch. 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoD 6025.18-R, DoD Health Information Privacy Regulation

PURPOSE: Clinical personnel (radiologists) can access and view digital images using DynaCad at their workstation. DynaCAD uses personally identifiable information and protected health information, such as demographic, medical record, and diagnostic/therapeutic data elements on patients.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3). For additional information on SORN, EDHA 07, <https://dpcl.d.defense.gov/Portals/49/Documents/Privacy/SORNS/DHA/EDHA-07.pdf>.

DISCLOSURE: Voluntary: however, failure to provide the requested information will result in denial of access or application submission.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component? (Check all that apply)

- | | |
|--|---|
| <input checked="" type="checkbox"/> Within the DoD Component | Specify. DHA Military Treatment Facilities (MTF)s |
| <input type="checkbox"/> Other DoD Components (i.e. Army, Navy, Air Force) | Specify. |
| <input type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. |
| <input type="checkbox"/> State and Local Agencies | Specify. |
| <input type="checkbox"/> Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.) | Specify. |
| <input type="checkbox"/> Other (e.g., commercial providers, colleges). | Specify. |

i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)

- Individuals Databases

Existing DoD Information Systems Commercial Systems

Other Federal Information Systems

Composite Health Care System (CHCS)

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

E-mail Official Form (Enter Form Number(s) in the box below)

In-Person Contact Paper

Fax Telephone Interview

Information Sharing - System to System Website/E-Form

Other (If Other, enter the information in the box below)

k. 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 must be consistent.

Yes No

If "Yes," enter SORN System Identifier EDHA-07

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/Privacy/SORNs/>
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?

(1) NARA Job Number or General Records Schedule Authority. GRS 5.1, Item 020 (DAA-GRS-2016-0016-0002)

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

FILE NUMBER: 1601-17

DISPOSITION: Temporary. Delete no more than 7 years from the date last modified. (See DoD DTM 22-001 on default disposition policies and OSD Records Manager guidance which file number to associate).

m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.

(1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.

(2) If a SORN does not apply, 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) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.

(b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, 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 must be identified.

Public Law 104-191, Health Insurance Portability and Accountability Act of 1996; 10 U.S.C., Chapter Ch. 55, Medical and Dental Care; 10

U.S.C. 1097a, TRICARE Prime: Automatic Enrollments; Payment Options; 10 U.S.C. 1097b, TRICARE Prime and TRICARE Program: Financial Management; 10 U.S.C. 1079, Contracts for Medical Care for Spouses and Children: Plans; 10 U.S.C. 1079a, TRICARE Program: Treatment of Refunds and Other Amounts Collected Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 U.S.C. 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095, Health Care Services Incurred on behalf of Covered Beneficiaries: Collection From Third-party Payers; 42 U.S.C. 290dd, Substance Abuse Among Government and Other Employees; 42 U.S.C. 290dd-2, Confidentiality Of Records; 42 U.S.C. 42 U.S.C. Ch. 117, Sections 11131-11152, Reporting of Information; 45 CFR 164, Security and Privacy; Department of Defense (DoD) Instruction 6015.23, Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFS); DoDI 6025.18; and E.O. 9397 (SSN).

n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (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 No Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

According to section 8 of the "DOD Information Collections Manual: Procedures for DoD Public Information Collections", the PII/PHI collected by MMIS is not considered a public information collection and does not require an active and approved (OMB) Control Number.