

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:

Stryker Connected Operating Room Hub_AA

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

12/01/23

CyberLOG

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.

The Stryker Connected OR Hub is an Information Management System for capturing still images, recording live video, and displaying medical device data on connected displays. Stryker Connected OR Hub can be used in general laparoscopy, endoscopy, or arthroscopy surgeries.

Personally Identifiable Information (PII) collected includes personal identifiers, and demographics. Protected Health Information (PHI) is collected in the form of photographic images and video clips. PII is collected from both members of the general public and Federal employees. The PII in this application is collected via existing DoD systems. The following categories of patients are from Department of Defense's (DoD's) Health Care Beneficiaries to include members of Active Duty, Retirees and their family members as well as other individuals eligible for care at DoD's Military Treatment Facilities (MTFs).

Cyber Logistics (Cyberlog) is responsible for the Risk Management Framework (RMF) process and gaining an approval from Defense Health Agency's Joint 6 Risk Management Executive Division (DHA's J6 RMED). Local sites are responsible for day-to-day operations, maintenance, and management of Stryker Connected OR Hub. Sites are responsible for ensuring the device is configured to meet CyberLOG and RMED approved configurations. Stryker Connected OR Hub is owned by CyberLOG and operated by various MTF as needed.

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 to match an individual with his/her medical diagnostic reports and to ensure accuracy when these reports are integrated in the individual medical. The intended use for the collection of PII is used for mission-related purposes to support the enhancement of the delivery of healthcare services.

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 do not have the opportunity to object to the collection of their PII, Stryker Connected OR Hub is not the initial point of collection. Individuals have the opportunity to object to the collection of their PII during registration when Department of Defense's (DD) Form 2005, Privacy Act Statement in the Health Care Records is provided to the patient for review and obtain their signature.

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.

Individuals do not have the opportunity to object to the collection of their PII, Stryker Connected OR Hub is not the initial point of collection. Individuals have the opportunity to consent to the specific use of their PII during registration when DD 2005, Privacy Act Statement in the Health Care Records is provided to the patient for review and to obtain their signature.

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

The Stryker Connected OR Hub does not collect PII directly from individuals.

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. | Defense Health Agencies (DHA) Medical Treatment Facilities (MTF) |
| Other DoD Components (i.e. Army, Navy, Air Force) | Specify. | |
| <input checked="" type="checkbox"/> Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) | Specify. | Department of Veteran Affairs, Health and Human Services, Homeland Security, US Coast Guard |
| State and Local Agencies | Specify. | |
| <input checked="" 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. | The MTFs may utilize contractor services to support this product. DoD policy requires such contracts include language to safeguard PII including FAR clauses: 52.224-1, Privacy Act Notification; 52.224-2, Privacy Act; and FAR 39.105, Privacy. When the contractor has access to PHI, a HIPAA Business Associate Agreement is also required. |
| 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 |
| <input checked="" type="checkbox"/> Existing DoD Information Systems | Commercial Systems |
| Other Federal Information Systems | |

Existing DoD Information Systems:

Composite Health Care System (CHCS)

Armed Forces Health Longitudinal Technology Application (AHLTA)

DoD Healthcare Management System Modernization Electronic Health Record (GENESIS)

Picture Archive and Communication System (PACS)

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 |
| <input checked="" type="checkbox"/> 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 - Military Health Information 

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.

I. 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 5.2, item 020 (DAA-GRS-2017-0003-0002)

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

(3) Retention Instructions.

FILE NUMBER: 103-14

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.

5 USC 301, Department Regulation; 10 USC Chapter 55; Pub.L. 104-91, Health Insurance Portability and Accountability Act of 1996; DoDI 6025.18; 10 USC 1071-1085, Medical and Dental Care; 42 USC Chapter 117, Sections 11131-11152, Reporting of Information; 10 USC 1097a and 1097b, TRICARE Prime and TRICARE Program; 10 USC 1079, Contracts for Medical Care for Spouses and Children; 10 USC 1079a, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); 10 USC 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD 6010.8-R, CHAMPUS; 10 U.S.C. 1095, Collection from Third Party Payers Act; and EO 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.

System does not collect information directly from members of the public. It is for the diagnosis and treatment of medical disorders and is not considered a public information collection in accordance with DoDM 8910.01, V2, Encl 3, paragraph 8b(5).