

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:

Patient Safety Reporting (PSR)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

09/11/23

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.

Patient Safety Reporting (PSR) is a Public-key infrastructure/Common Access Card (PKI/CAC) compliant Commercial Off-the-Shelf (COTS) automated information system (AIS) for patient safety event reporting, event investigation/management, and data analysis. PSR was created to identify process and systems issues, thereby optimizing patient safety initiatives in the direct care system in order to reduce and/or prevent harm from occurring to Department of Defense (DoD) beneficiaries. PSR is implemented throughout the Military Health System (MHS) direct care facilities and theater operations, and is available to any MTF personnel with a valid CAC to enter event information from a CAC-enabled computer with access to the Internet. PSR meets the functional requirement for anonymous reporting, allowing the reporter to self-enter their name and contact information in designated fields as well as additional information based on their involvement or observation of a patient safety event. PSR functionality includes automated tools for users to classify medical errors and produce trending reports to support the clinical quality management and patient safety mission. PSR is used in the course of DHA Clinical Quality Management (CQM) activities and governed by DHA Procedures Manual 6025.13 Clinical Quality Management (CQM) in the Military Health System, Volumes 1 - 7, and the references therein. Data in PSR is collected for the purpose of MHS CQM programs.

The Personally Identifiable Information (PII)/Protected Health Information (PHI) about individuals entered by the PSR user includes: Patient personal descriptors and the unique identification number; MTF personnel's name and contact information, protected health information, event reviewer, event handler, and the facility patient safety manager.

The individuals whose information may be entered and stored in this system include active duty military of the seven uniformed services, members of the National Guard and Reserves, veterans, dependents, retirees and/or their dependents, contractors, foreign nationals, former spouses, and prisoners of war.

PSR is an Information Technology (IT) project managed by the Clinical Support Program Management Office (CSPMO)/Solution Delivery Division (SDD)/Program Executive Office (PEO) Medical Systems (J-6)/Defense Health Agency (DHA).

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)

PSR collects PII/PHI for mission-related use to support the mission of the DoD Patient Safety Center. The intended use of collected PII/PHI is to identify the patient, medical providers, or other persons who may have witnessed or been involved in a patient safety event.

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 as PSR does not serve as the initial point of collection.

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 consent to the specific uses of their PII as PSR does not serve as the initial point of collection.

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

PSR does not collect PII directly from individuals. Therefore, no Privacy Act Statement or Privacy Advisory is required.

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)

- Within the DoD Component Specify. DHA Military Treatment Facilities (MTFs)
- Other DoD Components (i.e. Army, Navy, Air Force) Specify. Departments of the Army, Navy, and Air Force; DoD Combatant Command(s)
- Other Federal Agencies (i.e. Veteran's Affairs, Energy, State) Specify. Department of Veterans Affairs (VA) Veterans Health Administration (VHA) Medical Centers; The National Center for Patient Safety (NCPS)
- State and Local Agencies Specify.
- 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. RLDatix - Tier III System Maintenance Personnel with IT-II or higher security clearance "The Contractor shall establish appropriate administrative, technical, and physical safeguards to protect any and all Government data. The Contractor shall also ensure the confidentiality, integrity, and availability of Government data in compliance with all applicable laws and regulations, including data breach reporting and response requirements, in accordance with DFAR Subpart 224.1 (Protection of Individual Privacy), which incorporates by reference DoDD 5400.11, "DoD Privacy Program," May 8, 2007, and DoD 5400.11-R, "DoD Privacy Program," May 14, 2007. The Contractor shall also comply with federal laws relating to freedom of information and records management."
- Note: DoDD 5400.11 was reissued as and canceled by DoD Instruction 5400.11, "DoD Privacy and Civil Liberties Programs," January 29, 2019.
- 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

Information may be manually retrieved and entered by the user from the Composite Health Care System (CHCS), AHLTA, Essentris, MHS GENESIS, the Defense Medical Human Resources System - internet (DMHRSi) or other clinical and business systems used at the MTF. An automated interface with any clinical or business system does not exist.

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)

PSR URL: <https://patientsafety.csd.disa.mil/>

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. Unscheduled

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

(3) Retention Instructions.

Unscheduled - Permanent. Treat system and/or records maintained in the system as permanent until a NARA approved schedule and disposition authority has been applied.

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.

Department of Defense (DOD) - Pub. Law 106-398 Section 754, Patient Care Reporting and Management System; 10 U.S.C. § 1102 Confidentiality of Medical Quality Assurance Record: Qualified Immunity for Participants; 10 U.S.C. Section 55, Medical and Dental Care; 42 U.S.C. Chapter 6A, Subchapter VII, Part C, Patient Safety Improvement; 32 CFR 199.17, TRICARE Program; DHA Procedures Manual 6025.13, Clinical Quality Management in the Military Health System (MHS) Volumes 1-7 and the references therein.

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.

Per DHA's Information Management Control Officer (IMCO), PSR does not require an OMB Control Number as the system is not the initial point of collection of information.