



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Medical Education Training Research Consultation System (METRCS)
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DoD Component Name: USAF
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### **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
- Existing DoD Information System
- Significantly Modified DoD Information System
- New Electronic Collection
- Existing Electronic Collection

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

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.

- 1) Health Insurance Portability and Accountability Act (Pub. Law No. 104-191 §§ 262,264; 45 C.F.R. §§160-164)
- 2) 5 U.S.C 301, Departmental Regulations 10 U.S.C. 8013, Secretary of the Air Force;
- 3) Air Force Instruction 36-2201, Air Force Training Program;
- 4) Air Force Instruction 36-2301, Professional Military Education; and E.O. 9397(SSN).
- 5) The Privacy Act of 1974, 5 U.S.C. 552a
- 6) AFI 33-332, Privacy Act Program

**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.

According to the Administrative Simplification Compliance Act (ASCA) amended the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the 711th Human Performance Wing (711 HPW) USAF School of Aerospace Medicine (USAFSAM) mission is considered a covered entity. METRCS is an Automated Information System (AIS) consists of medical applications and databases in a local area network within the USAF GIG. The purpose of Medical Education Training Research Consultation System (METRCS) is to support the US Air Force 711th Human Performance Wing Aerospace Medicine USAF School of Aerospace Medicine (USAFSAM) by means of aerospace education, training, research and medical consultation services at USAF, DOD levels to Enhance War fighter Performance and Combat Casualty Care for Worldwide Operations in Peacetime and War. METRCS system consists of combinations of COTS and GOTS. METRCS hosts and supports medical applications, locally developed with Visual Studio Dot Net, for the web and desktop along with commercial off the shelf applications.

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

According to Department of Defense (DoD) Guidance on Protecting Personally Identifiable Information (PII) , OMB M-06-16 (Protection of Sensitive Agency Information), and NIST SP800-66 , the 711th Human Performance Wing (711 HPW), USAF School of Aerospace Medicine (USAFSAM) implemented administrative security controls such as METRCS security policy, disaster recovery and contingency plans, annual Privacy and PII training. 711th Human Performance Wing (711 HPW), USAF School of Aerospace Medicine (USAFSAM) HPW IAO implements technical security controls such as encryption and access controls along with physical security controls on all sensitive records. These security controls ensure confidentiality accessibility, and authenticity of PII. METRCS security architecture processes unclassified sensitive information limited only to USAFSAM and 711HPW departments' personnel. All users have a signed system access request DOD form DD2875. Users access METRCS exclusively through USAF Kerberos v5 Active directory and DOD PKI infrastructure with token smart card authentication.

**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.

USAF

**Other DoD Components.**

Specify.

**Other Federal Agencies.**

Specify.

Veteran Administration

**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.

(2) If "No," state the reason why individuals cannot object.

The collection of PII on individuals is an important part of performing the medical diagnosis and treatment. Moreover, according to AFI33-332 para graph 3.3.1 "The Air Force requests an individual's SSN and provides the individual information required by law when anyone enters military service or becomes an Air Force civilian employee. The Air Force uses the SSN as a service or employment number to reference the individual's official records." The 711th HPW/USAFSAM is a covered entity (see g1); A covered entity may, without the individual's authorization:

Use or disclose protected health information for its own treatment, payment, and health care operations activities. For example: A primary care provider may send a copy of an individual's medical record to a specialist who needs the information to treat the individual.

Each entity either has or had a relationship with the individual who is the subject of the information, and the protected health information pertains to the relationship; and The disclosure is for a quality-related health care operations activity (i.e., the activities listed in paragraphs (1) and (2) of the definition of "health care operations" at 45 CFR 164.501) or for the purpose of health care fraud and abuse detection or compliance. For example: < A health care provider may disclose protected health information to a health plan for the plan's Health Plan Employer Data and Information Set (HEDIS) purposes, provided that the health plan has or had a relationship with the individual who is the subject of the information.

A covered entity that participates in an organized health care arrangement (OHCA) may disclose protected health information about an individual to another covered entity that participates in the OHCA for any joint health care operations of the OHCA. For example:

The physicians with staff privileges at a hospital may participate in the hospital's training of medical students. Uses and Disclosures of Psychotherapy Notes. Except when psychotherapy notes are used by the originator to carry out treatment, or by the covered entity for certain other limited health care operations, uses and disclosures of psychotherapy notes for treatment, payment, and health care operations require the individual's authorization. See 45 CFR 164.508(a)(2).

**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.

Under the Health Insurance Portability and Accountability Act (Pub. Law No. 104-191 §§ 262,264: 45 C.F.R. §§160-164), see also 45 CFR 164.508(a)(2). all patients must sign a consent form to the specific uses of their PII outlined in 45 CFR 164.508.

(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.

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> <b>Privacy Act Statement</b> | <input type="checkbox"/> <b>Privacy Advisory</b> |
| <input checked="" type="checkbox"/> <b>Other</b>                 | <input type="checkbox"/> <b>None</b>             |

Describe each applicable format.

consent form Health Insurance Portability and Accountability Act (Pub. Law No. 104-191 §§ 262,264: 45 C.F.R. §§160-164)

**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.**



















