# PRIVACY IMPACT ASSESSMENT (PIA)

## For the

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| Anesthesia Recording and Monitoring Device (ARMD) (INNOVIAN) |
| Department of the Navy - TMA DHP Funded System - BUMED |

## 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 Registered in ITACS

☐ **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** N06150-2

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.

System of Record Authorities:

5 U.S.C. 301, Departmental Regulations 10 U.S.C. 1095, Collection from Third Party Payers Act
10 U.S.C. 5131, as amended
10 U.S.C. 5132
44 U.S.C. 3101
10 CFR part 20, Standards for Protection Against Radiation
E.O. 9397 (SSN), as amended.

Additional Authorities:

Medical and dental care in the DoD are authorized by Chapter 55 of Title 10 U.S.C., section 1071 - 1106.

**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.

The purpose of the Innovian Anesthesia system is to provide a distributed solution that permits comprehensive data management for the anesthesiast. The system captures and manages anesthesia vital signs information in the Operating Room (OR) environment. The Innovian Anesthesia system automates and integrates critical modules in the OR. The IntraOp and Reporting modules within the OR environment now provide efficient data access and collection, allowing the care providers to spend more time with patients. It also provides standard information processes and automates the procedures for required data fields, time stamps and electronic signatures, providing an extremely comprehensive record. This makes it much easier for a Medical Treatment Facility (MTF) to illustrate regulatory compliance. Finally, the Innovian Anesthesia system establishes and maintains a master record of all the critical activity within the OR environment.

PII collected about individuals include: name, truncated and full social security number (SSN), citizenship, legal status, gender, race/ethnicity, DOB, personal cell phone and home phone number, mailing home address, marital status, emergency contact, Spouse information: Name, address and contact number; and medical information: Each workstation supports automated acquisition of patient vital signs from monitoring devices (eg. monitors, anesthesia machines, gas analyzers) via serial port connections. (from the DIACAP).

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

All systems are vulnerable to "insider threats". Innovian Anesthesia managers are vigilant to this threat by limiting system access to those individuals who have a defined need to access the information. There are defined criteria to identify who should have access to the Innovian Anesthesia system. These individuals have gone through DoD background and employment investigations.

**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. PII will be retained within each Medical Treatment Facility (MTF) and will only be accessed by authorized care providers.

☐ **Other DoD Components.**

Specify.

☐ **Other Federal Agencies.**

Specify.

☐ **State and Local Agencies.**

Specify.

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

Specify. A site may maintain site-level contracts, and therefore, it is possible that some sites may involve contractors from different contracting companies performing system administration, maintenance or troubleshooting. There are standard clauses in Navy Medicine contracts to include Business Associate Agreement and Federal Acquisition Regulation (FAR) clauses 52.224 - 1 - Privacy Act Notification and 52.224 - 2 - Privacy Act.

☐ **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 Innovian Anesthesia system does not collect PII directly from the patient - it is not the source system. PII is obtained from the Composite Health Care System (CHCS) and manually entered into the system, or downloaded through the Surgical Scheduling System (S3) connection.

**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.

(2) If "No," state the reason why individuals cannot give or withhold their consent.

The Innovian Anesthesia system does not collect PII directly from the patient - it is not the source system. PII is obtained from the Composite Health Care System (CHCS) and manually entered into the system, or downloaded through the Surgical Scheduling System (S3) connection.

**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 applicable format.

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**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.**