



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

SNAP Automated Medical System (SAMS)

TMA DHP Funded System - Department of Navy

### 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.

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; and, E.O. 9397 (SSN)

Additional Authorities: Title 10; SUB A; Part II, CH 55; SEC 1074F, Medical Tracking System for Members Deployed Overseas

**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 SAMS is to continue the ongoing need for commandant, area commanders, and field level commanding officers to assess medical operational readiness within legacy environments. This relationship is based on the ability of SAMS to:

- Store, process, and retrieve medical data
- Monitor the operating site's medical environment
- Provide administrative support for patient medical encounters (PMEs)
- Support medical supply management

Types of personal information about individuals collected in the system:

User type (Active Duty and Reserve Military), User ID, Rank, Pay grade Command info (address, UIC), Immunization data, Medical ICD 9 Codes, Physician notes on patient care.

This information is also provided in section 3.a.1

(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". SAMS 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 SAMS. These individuals have gone through extensive background and employment investigations. SAMS program is always evaluating risks in safeguarding data in the application. SAMS does, at a minimum, an annual review of its DoD 8500 application security controls, follows OMB Communications-202-395-7254, and Best Practices. In an effort to make the federal government's identity theft awareness, prevention, detection, and prosecution efforts more effective and efficient, the Office of Management and Budget, (OMB), along with the Department of Homeland Security (DHS), list of best practices to help agencies improve the security and privacy of their information systems is incorporated into SAMS IA testing. Each risk listed in the Certification report to the ODAA, in categories ranging from security and privacy training for personnel to procurement issues, is associated with selected best practices and important resources to help SAMS mitigate and avoid these risks. These appendices, submitted in the DITSCAP process, as Appendix P (test report) and Q (Risk assessment) are evaluated to provide the best possible safeguards of privacy information.

**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.

Navy Medicine Online (NMO), Naval Medical Information Management Center (NMIMC); Bureau of Medicine and Surgery (BUMED) Budget Submission Office authorized users and operational commands of the Navy and Marine Corps)

**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.

- 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.

There is no opportunity for individuals to object/consent to collection of immunization data. Reference DoDI 6025.19, IMR provides guidance for collecting identifiable patient data that directly affects Medical Readiness.

SECNAVINST 6230.4 requires all immunization data of military members be entered into DEERS and be maintained in a repository within the Department of the Navy. As such, the service member is required to provide the appropriate identifiable information. This immunization data is used to determine the Medical Readiness of the individual service member and the operational unit to which the service member is attached.

**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.

There is no opportunity for individuals to object/consent to collection of immunization data. Reference DoDI 6025.19, Individual Medical Readiness (IMR), provides guidance for collecting identifiable patient data that directly affects Medical Readiness.

Members are verbally counseled regarding the collection of data as mandated in DoDI 6025.19, Individual Medical Readiness (IMR), and SECNAVINST 6230.4,

**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.

Members are verbally counseled regarding the collection of data as mandated in DoDI 6025.19, IMR, and SECNAVINST 6230.4, A Privacy Act Statement is maintained in the physical medical record of each member.

**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.**