PRIVACY IMPACT ASSESSMENT (PIA)

For the

Electronic Pharmacy Mobile Application (EPMA)
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	
☐	**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.

SORN authorities:

5 U.S.C. 301, Departmental Regulations;
10 U.S.C. 1095, Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection from Third Party Payers Act;
10 U.S.C. 5131 (as amended), Bureau: Name, Location;
10 U.S.C. 5132 Bureau: Distribution of Business, orders, records, expenses;
44 U.S.C. 3101, Records Management by Agency Heads;
10 CFR part 20, Standards for Protection Against Radiation;
5 CFR 293.502, Subpart E; Employee Medical File System Records
29 CFR Part 5, Labor Standards
5 CFR 339.101-306, Coverage
DoDD 6485.1, Human Immunodeficiency Virus-1 (HIV-1)
DoD 6025.18R, DoD Health Information Privacy Regulations
E.O. 9397 (SSN), as amended.

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 Electronic Pharmacy Mobile Application (EPMA) will allow an enrolled beneficiary (user) who has registered for this service (where available) to access common pharmacy patient functions via a personal mobile device based application. The patient (hereafter referred to as the user) registration shall be performed through DSLogon managed by the Defense Manpower Data Center (DMDC). The user must first logon and be validated each time through DSLogon in order to use EPMA or access data.

The mobile application's functionality will allow the user to fill new prescriptions, refill existing prescriptions, and access prescription history from a mobile 'smart' device. A mobile smart device is defined as a cordless transportable device which is capable of accessing the internet, provides geo-location information, and provides voice and/or video communication while operating autonomously.

EPMA allows a user to view their pharmacy data and request through encrypted interface with an existing DoD hosted web site to have pharmacy services provided. Once the App is closed the session is closed and all of the activity occurs behind the DSLogon session.

Personal Identifiable Information (PII) collected about individuals include: Name, personal cell phone number, mailing/home address, medical information: medication profile to include drug name, fill date, prescription number, provider name, refills, and allergies; other ID number: DoD ID Number, case file number, service ID, student ID, and green card; and personal e-mail address and spouse and child information: patient name and medication profile if the information owner approves.

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

The mobile site and other existing systems that present the data displayed through EPMA on a mobile device use current safeguards as required to limit access in those systems to PII or PHI.

All systems are vulnerable to "insider threats". The manager is 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 system. These individuals have gone through extensive 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. Military Treatment Facilities (MTF)

☐ **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.

EPMA is not required for patients to receive pharmacy services and after downloading the app they will be provided with a consent banner for use of the app. they must consent before beginning the process to get registered.

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

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.

EPMA is mobile capability for patients who wish to gain access to their medication profiles and have other pharmacy services. The existing core systems that store medical data as part of the routine care only provide EPMA data after patient downloads the app and they acknowledge consent.

(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.

☐	**Privacy Act Statement**	☒	**Privacy Advisory**
☐	**Other**	☐	**None**

Describe each applicable format.

A privacy advisory is presented when the application is downloaded and used for first time. It is also presented when they allow another family member to act for them.

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.