PRIVACY IMPACT ASSESSMENT (PIA)

For the

Parata Systems Suite
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	eMASS under #1257
☐	**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)
10 U.S.C. 5132
44 U.S.C. 3101
10 CFR part 20, Standards for Protection Against Radiation
E.O. 9397 Social Security Number (SSN), as amended.

Other authorities:

Medical and dental care in the DoD are authorized by Chapter 55 of Title 10 U.S.C., section 1071 - 1106. The provision of a pharmacy benefit is part of the medical care benefit.

42 CFR 290DD Drug and Alcohol Treatment Records
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 6025.18-R, Health Information Privacy Regulation

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 Parata Pharmacy Suite is a total pharmacy solution that combines a system management program with prescription bar code scanning, sophisticated automation, and electronic imaging.

The Parata products in use at Navy Medicine are:

1) The Mini system - a pharmacy support system automating a portion of customer prescription activities, namely the filling of prescriptions into locked chutes for technician retrieval. It is a semi-automated prescription-filling device that counts pills while dispensing them into gated chutes located on the pharmacy side of the unit.
3) The Max system - a pharmacy support system automating a portion of customer prescription activities, to include the filling of prescriptions into vials with appropriate patient labels. It is a prescription-filling device that automates vial selection, vial labeling, pill counting, vial capping and sorting of completed prescriptions into built-in shelving units by patient last name for technician retrieval.
4) P2000 (P2K) pharmacy management system. P2K requires a dedicated server, plus a sufficient number of workstations for pharmacy staff to perform prescription imaging, filling and/or checking operations.

The types of personally identifiable information (PII) collected in the system include patient name, SSN, truncated SSN, home address, and medical information: Prescribed Drugs. In addition, the PII sent from the DoD Composite Health Care System (CHCS) includes the sponsor's SSN and the prescribed drug.

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

All systems are at risk because they may be vulnerable to unauthorized intrusion, hacking and "insider threats." There are risks that Parata, with its PII, could be compromised. Because of this possibility, appropriate administrative, technical and security controls listed in this PIA are in place to include 1) limiting system access to those individuals who have a defined need to access the information and 2) ensuring individuals have met the personnel security requirements in accordance with SECNAV M-5510.30. Additionally contractors have a business associate agreement clause in their contract that details their roles and responsibilities in accordance with the HIPAA Privacy Rule.

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. Pharmacy staff

☐ **Other DoD Components.**

Specify.

☒ **Other Federal Agencies.**

Specify. DEA

☐ **State and Local Agencies.**

Specify.

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

Specify. Parata. Section 5.10 5.10 Confidentiality. Contractors and/or service vendors will comply with all applicable Privacy Act requirements, in regards to any personally identifiable information (PII) and protected health information (PHI). Information regarding Privacy Act, PII, and PHI is available to contract personnel for review at the laboratories.
Section 5.14. Business Associate Agreement clause.

☐ **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 Parata Pharmacy Suite does not collect PII directly from the patient - it is not the source system. Parata Systems Suite receives all of PII from CHCS.

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 Parata Systems Suite does not collect PII directly from the patient - it is not the source system. Parata Systems Suite receives all of PII from CHCS. The information is used for medical treatment purposes.

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.

The Parata Pharmacy Suite does not collect PII directly from the patient - it is not the source system. Parata Systems Suite receives all of PII from CHCS.

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.