PRIVACY IMPACT ASSESSMENT (PIA)

For the

Telepharmacy Remote Dispensing and Verification System - SCRIPTPRO (TRVDS)
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 | DITPR ID: 10739 |

☐   **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 | UII: 007-000002513 |

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 <u>retrieved</u> 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, Department 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), Bureaus: names; location
10 U.S.C. 5132, Bureaus: distribution of business; orders; records; expenses
44 U.S.C. 3101, Records management by agency heads; general duties
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);
6025.18R, DoD Health Information Privacy Regulation;
E.O. 9397 (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 - 1006. The provision of a pharmacy benefit is part of the medical care benefit.

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42 CFR 290DD Drug and Alcohol Treatment Records;

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.

ScriptPro SP Central System with Telepharmacy Remote Dispensing and Verification System (TRDVS) is an Automated Information System (AIS). The main purpose of the system is to automate the filling of prescriptions and to serve as a workflow management tool within the pharmacy to provide accurate, verified and efficient drug dispense by use of state of the art robotic technology. SP Central works with the existing pharmacy computer system and utilizes barcode scanning controls to ensure prescription accuracy. This advanced workflow technology directs the dispensing process from point of entry to patient delivery.

ScriptPro Health Messaging Services (HMS) is a browser-based messaging system that support the TRDVS program by allowing pharmacy staff and health care providers to generate or review messages from any internet-connected computer and connect to the SP Central-HMS hosted environment in a Navy data center. HMS integrates with SP Central allowing users on the HMS system to send messages directly to pharmacies in the enterprise or pharmacy staff to send messages to HMS from their SP Central workstations.

The types of PII collected in the system include name, birth date, prefix (an assigned number), gender of patient, prescription number, and SSN of sponsor.

(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." Pharmacy 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 ScriptPro SP Central - HMS. 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. The authorized pharmacy staff will have access to PII as part of their duties. Vendor authorized personnel will have access to the system to perform support and maintenance.

☐ **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. | Contractor name is also ScriptPro. ScriptPro is required to comply with standard MHS Business Associate Agreement (BAA) language. In accordance with DoD 6025.18-R "Department of Defense Health Information Privacy Regulation" the Contractor meets the definition of Business Associate. Therefore, a Business Associate Agreement is required to comply with both the Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security regulations. This clause serves as that agreement whereby the Contractor agrees to abide by all applicable HIPAA Privacy and Security requirements regarding health information as defined in this clause, and DoD 6025.18-R and DoD 8580.02-R, as amended. Additional requirements will be addressed when implemented.

☐ **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.

| ScriptPro SP Central - HMS does not collect PII directly from the patient - it is not the source system. |

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.

TRDVS does not collect PII directly from the patient - it is not the source system. 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.	TRDVS does not collect PII directly from the patient - it is not the source system. A pre-printed Department of Defense (DD) Form 2005, "Privacy Act Statement - Health Care Records" is provided to the patient at the point of care for review and signature and it is placed in the patient's medical record.

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.