



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Marine Corps Medical Entitlements Data System (MCMEDS)
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Department of the Navy - United States Marine Corps (USMC)
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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.

The authorities cited for the collection, use, and dissemination of PII in MCMEDS is:

10 U.S.C. 5013, Secretary of the Navy

10 U.S.C. 5041, Headquarters, Marine Corps

10 U.S.C., Part 1 Chapter 506 Section 5042, in that, the Commandant of the Marine Corps will prepare for such employment of the Marine Corps, and for such recruiting, organizing, supplying, equipping (including research and development), training, servicing, mobilizing, demobilizing, administering, and maintaining of the Marine Corps

5 U.S.C. 301, Departmental Regulations

E.O. 9397 (SSN), as amended

SECNAVINST 1770.3D, Management and Disposition of Incapacitation and Incapacitation Benefits for Members of Navy and Marine Corps Reserve Components

DoD Instruction 1241.2, Reserve Component Incapacitation System Management

MCO 1770.2A, Notice of Eligibility (NOE) Benefits for Members of the Marine Corps Reserve

MCO P1001R.1J, Marine Corps Reserve Administrative Management Manual (MCRAMM)

10 U.S.C. 1074f, Medical Tracking System for Members Deployed Overseas

32 CFR 64.4, Management and Mobilization

DoD Dir 1215.13, Reserve Component Member Participation Policy

DoD Instruction 3001.02, Personnel Accountability in Conjunction with Natural and Manmade Disasters

CJCSM 3150.13B, Joint Reporting Structure Personnel Manual

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.

MCMEDS supports the Wounded Warrior Regiment (WWR) and the Reserve Reporting Unit (RRU) in the submission and tracking of incapacitation (InCap) benefits. Benefits available to eligible members may include inpatient or outpatient medical and dental treatment, InCap pay, separation pay or disability retirement. The records contained in the system include information that supports the Marine Corps Reserves in submitting Line of Duty (LOD) Determinations and Medical Hold (MedHold) requests.

The type of personal information collected in MCMEDS includes: Name, Social Security Number (SSN), Citizenship, Gender, Race, Birth Date, Home Phone, Home Address, Marital Status, Medical Information, and Military Records.

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

The privacy risks include the disclosure of sensitive medical information which may lead to medical identity/benefits theft, exploitation of medical conditions for blackmail, loss of medical benefits, and the exposure of the SSN to identity theft. Although PII is not authorized to be shared or released to individuals or systems without the prior written consent of the individual, the potential for "hackers" or dishonest employees to unlawfully disclose individuals' PII does exist. MCMEDS is used exclusively by authorized military, DoD personnel, and contractors supporting DoD. Potential privacy risks are mitigated through access restrictions, user roles and permissions, and annual Privacy and PII training. Annual security briefings conducted by their company's Facility Security Officer (FSO) is provided to contractors which includes safe handling procedures that cover receiving, viewing, printing, forwarding, storing, and shredding of PII data.

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.

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.

MCMEDES does not collect PII from the directly from the individual. PII is required for the submission and completion of LOD Determinations and InCap benefits and MedHold requests. PII is collected from the ODSE system. Individuals whose information is pulled from ODSE into MCMEDES and contains errors, may initiate an update to the information via the Total Force Administration System (TFAS) Marine Online (MOL) system. TFAS MOL allows Marines to update select biographical information.

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.

MCMEDES does not collect PII from the directly from the individual. PII resident in MCMEDES is used to provide the WWR and RRU the information for the submission of LOD Determinations and MedHold requests in order to determine eligibility for Incap pay and benefits or extension of mobilization orders. If an individual were given the opportunity to exclude their PII from MCMEDES, it would prevent them from being considered for the pay and benefits that they are entitled to due to injuries, illnesses, or diseases incurred during periods of active duty, inactive duty training or any other successive period of duty.

k. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Privacy Act Statement | <input checked="" type="checkbox"/> Privacy Advisory |
| <input type="checkbox"/> Other | <input type="checkbox"/> None |

Describe each applicable format.

MCMEDS does not collect PII from the directly from the individual.

All Service personnel and applicants for service sign their NAVMC 11000 Privacy Act Statements which are maintained in their Service Record Book (SRB), and covers collection of PII in all DoD Automated Information Systems (AIS).

The MCMEDS Program Manager is working with the developer to implement the MCMEDS specific Privacy Act Warning (PAW) Pop-up screen for all MCMEDS users to acknowledge, each and every time a user logs into MCMEDS. In addition, the MCMEDS Program Manager is also working with the developer to implement the MCMEDS Specific Privacy Advisory Statement (PAS) Pop-up screen for users to acknowledge providing to a Records Subject when collecting PII from a Records Subject. This PIA will be amended once the PAS is fully implemented within MCMEDS.

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.