



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Parata Pharmacy 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
- 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.

SORN 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
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 - 1106. The provision of a pharmacy benefit is part of the medical care benefit.

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 Parata Robotic Dispensing System (RDS) - an automated system for reading, labeling, filling, and capping drug pharmacy orders.
- 2) 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) sold as a software-only solution, however associated hardware can be made available should an installation site require. P2K requires a dedicated server, plus a sufficient number of workstations for pharmacy staff to perform prescription imaging, filling and/or checking operations. Connected to the P2K database, is AccuMed which is a robotic counting machine. It is an automated storage and retrieval systems for storing and dispensing medicine, namely, automated dispensers for pills or capsules sold empty and cabinets to hold the dispensers, counting heads in the nature of a mechanical device that releases pills and capsules from the dispenser into a chute and computer hardware and software to operate the dispensers, all of the foregoing sold together as a unit.

The types of personally identifiable information (PII) collected in the system include patient name, SSN, home address, and medical information. 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.

The perceived threats are primarily computer hackers, disgruntled employees, state sponsored information warfare, and acts of nature (e.g., fire, flood, etc.).

All systems are at risk because they may be vulnerable to unauthorized intrusion and hacking. There are risks that Parata, with its extensive collection of PII, could be compromised.

Because of this possibility, appropriate security and access controls listed in this PIA are in place.

Since Parata operates on the NMCI Network, there is a risk that security controls could be disabled for maintenance and other purposes. The risk would be that the security controls would not be reset.

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 the Parata Pharmacy Suite. 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. Parata agrees to use administrative, physical and technical safeguards that reasonably and appropriately protect the confidentiality, integrity and availability of the electronic protected health information or personally identifiable information that it creates, receives, maintains, or transmit in the execution of their Contracts

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.

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 Pharmacy Suite 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.

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

Describe each applicable format.

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.