



## PRIVACY IMPACT ASSESSMENT (PIA)

For the

Environmental Health and Safety Assistant (EHSA) Application

US Army Medical Command - Defense Health Program (DHP) Funded Application

### **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.

10 U.S.C 3013, Secretary of the Army; 10 U.S.C 1071-1085, Medical and Dental Care; 50 U.S.C. Supplement IV, Appendix 454, as amended, Persons liable for Training and Service; 42 U.S.C Chapter 117 Sections 11131-11152, Reporting of Information; 10 U.S.C 1097a and 1097b, Tricare Prime and Tricare Program; 10 U.S.C 1079, Contracts for Medical Care for Spouses and Children; 10 U.S.C 1079a, CHAMPUS; 10 U.S.C 1086, Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; E.O. 9397 (SSN); DoD Instruction 6015.23, Delivery of Healthcare at Military Treatment Facilities (MTFs); DoD Directive 6040.37, Confidentiality of Medical Quality Assurance (QA) Records; DoD 6010.8-R, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); Army Regulation 40-66, Medical Record Administration and Health Care Documentation.

**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.

Environmental Health and Safety Assistant (EHSA) is a client application with a back-end database consisting of a set of modules that allows for inventory and tracking of data related to an medical treatment facility's Nuclear Regulatory Commission license. Data includes radioactive material inventories; facility names and locations; and personnel information and training; as well as an employee's medical dosimetry (exposure to ionizing radiation or radioactive material) information. Data is retrieved for review via application modules and built-in reports.

Personal information collected includes demographic information and employment records. In some cases, the employee's pregnancy status is recorded.

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

The privacy risks associated with the PII collected are unauthorized access, inaccurate information entered into the system, and unauthorized disclosure of PII. Security safeguards (physical, technical, and administrative) are in place to mitigate these risks.

**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.

PII is shared with health care personnel within the Army medical treatment facility using this system and the United States Army Dosimetry Center.

**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.

Some providers and/or staff are employed in a contractual basis. There are clauses in their contracts requiring compliance with the Privacy Act and Health Insurance Portability and Accountability Act (HIPAA) requirements to protect the confidentiality of personal information.

Other (e.g., commercial providers, colleges).

Specify.

For employees who also work at a civilian hospital, there may be an exchange of the dose record data.

**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.

Department of Defense (DD) Form 1952 - Dosimeter Application and Record of Occupational Radiation Exposure Privacy Act Statement, is provided to the employee for review and signature after training is provided. This all inclusive Privacy Act Statement applies to individuals seeking employment as radiation workers. If the requested information is not furnished, the individual may not become a radiation worker.

(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.

Department of Defense (DD) Form 1952 - Dosimeter Application and Record of Occupational Radiation Exposure Privacy Act Statement. This all inclusive Privacy Act Statement applies to individuals seeking employment as radiation workers. If the individual withholds consent to specific uses of their PII, he or she may not become a radiation worker.

(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.	<p>DD Form 1952 - Dosimeter Application and Record of Occupational Radiation Exposure Privacy Act Statement is provided to the individual seeking employment as a radiation worker for review and signature.</p> <p>1. AUTHORITY FOR COLLECTION OF INFORMATION INCLUDING SOCIAL SECURITY NUMBER (SSN) 5 USC 301 - Departmental Regulation: Purposes; 42 USC 2073, 2093, 2095, 2111, 2133, 2134, 2201(b), and 2201(o). The authority for soliciting the social security number is 10 CFR 20; 44 USC 3101 - Record Management by Agency Heads, General Duties.</p> <p>2. PRINCIPAL PURPOSES FOR WHICH INFORMATION IS INTENDED TO BE USED To establish qualification of personnel monitoring and document previous exposure history. The information is used in the evaluation of risk exposure to ionizing radiation or radioactive materials. The data permits meaningful comparison of both current (short-term) and long-term exposure to ionizing radiation or radioactive material. Data on your exposure to ionizing radiation or radioactive material is available to you on your request.</p> <p>3. ROUTINE USES The information may be used to provide data to other Federal agencies, academic institutions, and non-governmental agencies, such as the National Council on Radiation Protection and Measurement and the National Research Council, involved in monitoring/evaluating exposures of individuals to ionizing radiation or radioactive materials who are employed as radiation workers on a permanent or temporary basis and exposure received by monitored visitors. The information may also be disclosed to appropriate authorities in the event the information indicates a violation or potential violation of law and in the course of an administrative or judicial proceeding.</p> <p>4. WHETHER DISCLOSURE IS MANDATORY OR VOLUNTARY AND EFFECT ON INDIVIDUAL OF NOT PROVIDING INFORMATION It is voluntary that you furnish the requested information, including social security number; however, the installation or activity must maintain a completed Automated Dosimetry Record (ADR) on each individual occupationally exposed to ionizing radiation or radioactive material as required by 10 CFR 20, 29 CFR 1910.96, and DA PAM 385-25. If information is not furnished, individual may not become a radiation worker. The social security number is used to assure that the Army/Agency has accurate identifier not subject to the coincidence of similar names or birth dates among the large number of persons on whom exposure data is maintained. Your signature merely acknowledges that you have been advised of the foregoing. If requested, a copy of this form will be furnished to you.</p>
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**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.**