PRIVACY IMPACT ASSESSMENT (PIA)

For the

Automated Neuropsychological Assessment Metrics (ANAM)
US Army Medical Command - DHP Funded System

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: 10105
- ☐ **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 007-97-01-17-02-2900-00

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 A0040-66b DASG

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.

The purpose of Automated Neuropsychological Assessment Metrics (ANAM) is to provide a computer-based test of human performance and neuropsychological functioning that will be used to assess the cognitive performance of all Active Duty Army, US Army Reserve, and Army National Guard Soldiers, as well as any other designated DoD Service Member or agency, as they deploy and/or redeploy. It will also be used to follow a Traumatic Brain Injury (TBI) event. Ultimately, the Service Members will be tested as they enter the military to establish a baseline assessment. The intent is to assess Service Members on a routine basis as part of their medical examination. The Service Member's baseline ANAM scores allow providers to compare these results against military norms and identify Service Members whose performance falls beneath those in that population. If the Service Member experiences an injury resulting in a TBI event or is exposed to other stressors that affect cognitive performance, the ANAM allows providers to assess the severity of the TBI and track the Service Member's recovery.

The following types of personal information are collected on individuals: Name, Social Security Number, Birth Date, Gender, Service, Status, Grade, Current Address/Home of Record, Contact Phone Numbers, Operation, Unit of Assignment, and Medical Information.

(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 application, and unauthorized disclosure of PII. Administrative, physical, and technical safeguards are in place to mitigate these risks as indicated in item 3d and 3f below.

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 medical providers within US Army Medical Command organizations.

☒ **Other DoD Components.**

Specify. PII is shared with medical providers within the Air Force, Navy, and Marine Corps.

☒ **Other Federal Agencies.**

Specify. PII is shared with Veterans Affairs medical providers after the Service Member's discharge.

☐ **State and Local Agencies.**

Specify.

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

Specify.

Eyak Development Corporation

Contract Language:

"The contractor may use or disclose Protected Health Information on behalf, or to provide services to, the Government for treatment, payment, or healthcare operations purposes, in accordance with the specific use and disclosure provisions below, if such use or disclosure of Protected Health Information would not violate the HIPAA Privacy Rule, DoD 6025.18-R or DoD 8580.02-R if done by the Government."

"The contractor may disclose Protected Health Information for the proper management and administration of the Contract, provided that disclosure will remain confidential and used, or further disclosed only as required by law, for the purpose for which it was disclosed to the person, and the person notifies the Contractor of any instances of which it is aware in which the confidentiality of the information has been breached."

"The contractor agrees to use administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic protected health information that it creates, receives, maintains, or transmits in the execution of this Contract."

☐ **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.

DODI 6490.13, dated June 4, 2013, mandates that all deploying Service Members receive a neurocognitive assessment using the ANAM tool.

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.

DODI 6490.13, dated June 4, 2013, mandates that all deploying Service Members receive a neurocognitive assessment using the ANAM tool.

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.

Service Members receive a brief which provides information about injuries to the brain, the ANAM tool, and the protection of their assessment results in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA) of 1996. The Service Member also must review the following Privacy Act Statement:

Privacy Act Statement:

This statement serves to inform you of the purpose for collecting personal information required by the Automated Neuropsychological Assessment Metrics (ANAM) and how it will be used.

AUTHORITY: 5 U.S.C. 301, Departmental Regulations; DoDI 1322.24, Medical Readiness Training; DoDI 6490.13, Comprehensive Policy on Neurocognitive Assessments by the Military Services and E. O. 9397 (SSN), as amended.

PURPOSE: Information is collected from individuals to verify the identity of eligible users of the ANAM and to track the completion of Federal and Department mandated assessment and training.

ROUTINE USES: In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended, the Department of Defense "Blanket Routine Uses" under 5 U.S.C. 552a(b)(3) set forth at the beginning of the Office of the Secretary of Defense compilation of systems of records notices apply to this collection.

DISCLOSURE: Voluntary. However, failure to provide the requested information violates provisions in DODI 6490.13, Comprehensive Policy on Neurocognitive Assessments by the Military Services,

which mandates completion of a neurocognitive assessment during the deployment cycle.

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.