



PRIVACY IMPACT ASSESSMENT (PIA)

For the

Respirator Fit Testing Management Software (FitPlus™)

US Army Medical Command – Defense Health Program (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
- 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; 5 U.S.C. 7902, Safety Programs; 29 U.S.C. 668, Programs of Federal Agencies; 29 CFR 1910, Occupational Safety and Health Standards; Army Regulation 40-5, Preventive Medicine; E.O. 12223, Occupational Safety Health Programs for Federal Employees; and E.O. 9397 (SSN).

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 FitPlus™ software is used to administer, record, and maintain respirator (protective mask) fit test results in a worker's Occupational Health medical record. Workers exposed to hazardous materials in the air (above the regulated standard) are required to wear a respirator in the workplace. These workers must first pass the Occupational Health and Safety Act (OSHA) required medical examination. The respirator fit test consists of an OSHA protocol of exercises an employee must perform to evaluate the facial seal of the respirator being worn. The FitPlus software prompts the respirator wearer through the required exercise protocol, records the results in a database, and prints reports. This fit test is the last step in obtaining the medical clearance to wear a respirator.

The type of PII collected includes demographics, employment information, and medical information.

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

The risks associated with the system use, and storage of PII are unauthorized access and unauthorized disclosure. Loss or compromise could occur through insecure or misdirected digital transmission, insecure storage (data-at-rest), or loss of printed copy. Appropriate safeguards are in place to minimize these risks as indicated in Section 3d 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 will be shared with health care providers within the medical treatment facility using this application to medically clear the employee as per OSHA requirements.

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.

There are some providers and/or staff that are employed in a contractual basis. There are clauses in their contracts that require compliance with the Privacy Act and Health Insurance Portability and Accountability Act (HIPAA) requirements to protect

confidentiality of personal information.

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.

Prior to the collection of PII, individuals are required to read and sign a Privacy Act Statement (Respirator Fit Testing Record). PII is collected verbally face-to-face as the data is entered into the software program. The employees can decline to provide their PII. If this occurs the fit test cannot be performed.

(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.

Prior to the collection of PII, individuals are required to read and sign a Privacy Act Statement (Respirator Fit Testing Record). If the employees objects to the specific uses of their PII, the fit test cannot be performed.

(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.

PRIVACY ACT STATEMENT – RESPIRATOR FIT TESTING RECORD

THIS FORM IS NOT A CONSENT FORM TO RELEASE OR USE HEALTH CARE INFORMATION PERTAINING TO YOU

1. AUTHORITY FOR COLLECTION OF INFORMATION. Executive Order 12196 and Occupational Health and Safety Act (OSHA), sections 19 and 1910.134(m)(2)

2. Principal Purposes for Which Information is intended to be used. This form provides you the advice required by the Privacy Act of 1974. The Personal identifiable information (PII) will identify your fit testing results as belonging to you and facilitate placing the results in your Occupational Health medical record. Their presence in the health record fulfills the OSHA requirement for the employer to maintain a copy of the fit test results until the next fit test is administered. The truncated Social Security Number (SSN) is used to insure the results are placed in the correct medical record. The employment information helps determine what type respirator is required.

3. Routine Use. The primary use of this information is to inform your supervisor which respirator you require and its effectiveness. It is also maintained as an OSHA requirement to document compliance to the mandated Respiratory Protection Program. The PII will be used to generate a suspense listing indicating when your next annual fit test is due. The results of the fit test minus the PII will be entered into the Defense Occupational and Environmental Health Readiness system. The fit test results will be made available to individuals inspecting compliance to the Respiratory Protection Program.

4. Whether Disclosure is Mandatory or Voluntary and Effect on the Individual of not Providing Information. Disclosure of Name is mandatory as required by OSHA, if Name is not furnished the fit test cannot be performed. The disclosure of truncated SSN and employment information is voluntary but may lead to miss files results and a fit test for an unsuitable respirator.

SIGNATURE OF EMPLOYEE

PRINTED NAME OF EMPLOYEE DATE

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.