PRIVACY IMPACT ASSESSMENT (PIA)

For the

Veterinary Services Systems Management (VSSM)
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** ☐ **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 9851

☐ **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 007-97-01-17-02-2903-00

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 A0040-905 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; DoD Directive 6015.5, Joint User of Military Health and Medical Facilities and Service; Army Regulation 40-905, Veterinary Health Services; 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.

VSSM is a TRICARE Management Activity (TMA) program that is being managed by the US Army Medical Command. The purpose of the system is to record and maintain complete health care information, to include treatment history and deployment status, of all Government Owned Animals (GOA). It will also collects the same information for privately owned animals seen at DoD Veterinary Treatment Facilities (VTFs) which, when combined with the GOA data, will produce a single mechanism to alert leaders and decision makers of potential threats to the health status of the force due to zoonotic disease, and provide sufficient information that will direct further investigation, if needed. VSSM will be deployed to all VTFs. VSSM is currently in the testing stage and will subsequently replace the animal health care module within the Veterinary Services Information Management System (VSIMS). Limited Rate Production is scheduled to begin 15 July 2013, Initial Operational Test and Evaluation event is scheduled to begin 21 October 2013, Full Rate Production is scheduled to begin 13 January 2014, and Full Operations Capability is scheduled to be achieved by 2 May 2014. Modules include patient scheduling, vitals, health care notes, treatment plans, invoicing, inventory, reports, data mining and medical analysis, kennel management, patient monitoring, lab results, reminder cards and follow-up tasks, and dashboard. VSSM is a web-based application and is hosted at the Pentagon.

VSSM will collect contact information on pet owners (name, address, phone numbers, and e-mail addresses).

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

Potential privacy risks include:

1) Unauthorized users accessing the patient owner data without having a need to know. Mitigation strategy: Access will be carefully administered and the data protected to preclude this from happening. VSSM will have role-based access, whereby users must be authenticated and will be granted access to only the records they are authorized to see.

2) Inaccurate information captured. Mitigation Strategy: As pet owner information is accessed by front desk personnel when conducting transactions, there are opportunities for the front desk person to verify the accuracy of the information with the pet owner.

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. Authorized users can access PII only on the pet owners for animals being seen in their Veterinary Treatment Facility

☐ **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 personnel who have access to the system are employed on a contractual basis. There are clauses in their contracts requiring compliance with the Privacy Act of 1974 requirements to protect and safeguard the privacy and security of personal information in this system.

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

Specify. Commercial laboratories for test results. The pet owner's name is on the laboratory request form.

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.

Pet owners can object to the collection of their PII during the patient registration, scheduling and/or check in processes. The pet owners will sign a document containing the Privacy Act Statement verbiage found on DD Form 2343 which is then scanned into the application.

(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.

Pet owners can give or withhold their consent to the specific uses of their PII during the patient registration, scheduling and/or check-in processes. The pet owners will sign a document containing the Privacy Act Statement verbiage found on DD Form 2343 which is then scanned into the application.

(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.

A document containing the Privacy Act Statement verbiage found on DD Form 2343 which is signed and then scanned into the application. The verbiage is:

PRIVACY ACT STATEMENT

AUTHORITY: Title 10, United States Code, Sections 3013, 5013, and 8013

PRINCIPAL PURPOSE(S): To ensure that all veterinary care, treatment, immunizations, etc., provided to animals of authorized owners are recorded.

ROUTINE USE(S): Used to maintain health records of animals and to locate animal owners for follow-up notification of care or treatment received.

DISCLOSURE: Providing personal information is voluntary. If information is not provided, the animal will not be provided veterinary care."

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.