

PRIVACY IMPACT ASSESSMENT (PIA)

PRESCRIBING AUTHORITY: DoD Instruction 5400.16, "DoD Privacy Impact Assessment (PIA) Guidance". Complete this form for Department of Defense (DoD) information systems or electronic collections of information (referred to as an "electronic collection" for the purpose of this form) that collect, maintain, use, and/or disseminate personally identifiable information (PII) about members of the public, Federal employees, contractors, or foreign nationals employed at U.S. military facilities internationally. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to system.

1. DOD INFORMATION SYSTEM/ELECTRONIC COLLECTION NAME:

DoD Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS)

2. DOD COMPONENT NAME:

Defense Health Agency

3. PIA APPROVAL DATE:

05/07/2025

SECTION 1: PII DESCRIPTION SUMMARY (FOR PUBLIC RELEASE)

a. The PII is: (Check one. Note: Federal contractors, military family members, and foreign nationals are included in general public.)

- ☐ From members of the general public ☐ From Federal employees
- ☒ from both members of the general public and Federal employees ☐ Not Collected (if checked proceed to Section 4)

b. The PII is in a: (Check one.)

- ☐ New DoD Information System ☐ New Electronic Collection
- ☒ Existing DoD Information System ☐ Existing Electronic Collection
- ☐ Significantly Modified DoD Information System

c. Describe the purpose of this DoD information system or electronic collection and describe the types of personal information about individuals collected in the system.

The Department of Defense (DoD) Women, Infants, and Children (WIC) Overseas Program was introduced by the DoD Health Affairs (HA) to provide eligible members of the Armed Forces, civilian employees, and DoD contractors living overseas, and their family members with nutritional foods. The WIC Overseas Participant Information Management System (WIC PIMS) Information System (IS) collects and processes program data containing limited Personally Identifiable Information (PII) and Protected Health Information (PHI) necessary to administer benefits and manage the program.

Personally Identifiable Information (PII)/Protected Health Information (PHI) collected by the WIC PIMS IS includes demographic information, contact information, medical information, truncated Social Security Number (SSN), and family information. Collection of truncated SSN (last four) will end by 12/31/2025 and existing data will be purged from the WIC PIMS IS by 7/31/2026.

The WIC PIMS Information System (IS) resides on one Platform-as-a-Service (PaaS) Windows Server 2019 virtual machine (VM) and one Database-as-a-Service (DBaaS) Microsoft SQL Server 2019 instance, both hosted by the Medical Community of Interest (MedCOI) Wilford Hall data center. The Windows Server 2019 VM has Internet Information System (IIS) installed to host a website. The Microsoft SQL Server 2019 DBaaS instance contains one Microsoft SQL database used to aggregate data from the PIMS desktop applications in use at the various WIC Overseas sites located on military installations overseas in Europe and the Far East to provide draft reconciliation, reporting, and other management functions. The data center environment is supported by additional entities that together comprise the hosting platform: Network Services Operation Center (NSOC), MedCOI, Compute and Storage Management Service (CSMS), DHA Medical Joint Active Directory (mJAD), and DHA Enterprise Splunk. Access to the WIC PIMS IS is restricted to users in the .mil domain and further restricted to WIC Overseas contractors with a valid DoD-issued CAC or ALT.

The system is owned by the DHA, TRICARE Health Plan Division, and operated by WIC Overseas, Cherokee Nation Aerospace and Defense. Information regarding the WIC Overseas Program can be obtained from <https://www.tricare.mil/wic>.

d. Why is the PII collected and/or what is the intended use of the PII? (e.g., verification, identification, authentication, data matching, mission-related use, administrative use)

PII is collected to verify an applicant's eligibility for the WIC Overseas Program.

e. Do individuals have the opportunity to object to the collection of their PII? ☒ Yes ☐ No

(1) If "Yes," describe the method by which individuals can object to the collection of PII.

(2) If "No," state the reason why individuals cannot object to the collection of PII.

Individuals can object to collection of PII by not providing the required information during the application process. If the required

information is not provided, the applicant will not be able to be processed into the WIC Overseas Program.

f. 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.

Individuals are given the opportunity to consent to the uses of their PII during the application process by completing and signing form WF7 – WIC Overseas Authorization to Release Information and Agency and Agency Disclosure Notice. Participants are also given the opportunity to consent to the release of their PII to other WIC agencies by means of the "Authorization to Release Information" flag in the PIMS application; applicants are asked if they will authorize release of their information and their response ("Yes" or "No") is recorded in the PIMS program during the visit process.

g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and/or a Privacy Advisory must be provided. (Check as appropriate and provide the actual wording.)

☒ Privacy Act Statement ☐ Privacy Advisory ☐ Not Applicable

The following Privacy Act Statement is provided to each applicant prior to applying for WIC Overseas Program benefits. The statement serves to inform individuals of the purpose for collecting personal information required by the WIC Overseas Program and how that information will be used.

Privacy Act Statement

This statement serves to inform you of the purpose for collecting personal information required by the Women, Infants, and Children (WIC) Overseas Program and how it will be used.

AUTHORITY: 10 U.S.C. 1060a, Special supplemental food program; 42 U.S.C. Chapter 13A, Child Nutrition; 7 CFR Part 246, Special Supplemental Nutrition Program for Women, Infants and Children; 32 CFR 199.23, Special Supplemental Food Program; HA Policy 09-004, Policy Memorandum for Women, Infants, and Children Overseas Program; and E.O. 9397 (SSN), as amended.

PURPOSE: To collect information from you in order to determine if you or your family members are eligible for the Women, Infants and Children (WIC) Overseas Program and to deliver those services if you or your family members are eligible to participate.

ROUTINE USES: Use and disclosure of your records outside of DoD may occur in accordance with 5 U.S.C. 552a(b) of the Privacy Act of 1974, as amended. This may include disclosures to federal, state, local, or foreign agencies to investigate or pursue potential breaches of law or regulation and to protect national security; to the Department of Justice for representing the DoD in litigation; to a congressional office when the request is made on behalf of the individual; to the National Archives and Records Administration for records management purposes; and to other non-DoD entities when disclosure is reasonably necessary to prevent or mitigate a data breach.

SYSTEM OF RECORDS NOTICE: The appropriate system of records notice for WIC PIMS is EDHA 10, DoD Women, Infants, and Children Overseas Participant Information Management System (April 09, 2014, 79 FR 19582), published at <https://health.mil/Military-Health-Topics/Privacy-and-Civil-Liberties/Privacy-Act-at-DHA/List-of-all-DHA-SORNs>.

DISCLOSURE: Voluntary: however, your failure to provide the requested information may affect you or your family members' ability to enroll in, or receive services from, the WIC Overseas Program.

h. With whom will the PII be shared through data/system exchange, both within your DoD Component and outside your Component?

(Check all that apply)

☒ Within the DoD Component

Specify. PII is shared with DHA or components within DoD as approved by DHA.

☐ Other DoD Components (i.e. Army, Navy, Air Force)

Specify.

☐ Other Federal Agencies (i.e. Veteran's Affairs, Energy, State)

Specify.

☒ State and Local Agencies

Specify.

Women, Infants, and Children Programs administered by state agencies, provided participant has authorized release.

☐ Contractor (Name of contractor and describe the language in the contract that safeguards PII. Include whether FAR privacy clauses, i.e., 52.224-1, Privacy Act Notification, 52.224-2, Privacy Act, and FAR 39.105 are included in the contract.)

Specify.

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

Specify.

i. Source of the PII collected is: (Check all that apply and list all information systems if applicable)

☒ Individuals

☐ Databases

- ☐ Existing DoD Information Systems ☐ Commercial Systems
☐ Other Federal Information Systems

j. How will the information be collected? (Check all that apply and list all Official Form Numbers if applicable)

- ☐ E-mail ☒ Official Form (Enter Form Number(s) in the box below)
☒ In-Person Contact ☐ Paper
☐ Fax ☒ Telephone Interview
☐ Information Sharing - System to System ☐ Website/E-Form
☐ Other (If Other, enter the information in the box below)

PII/PHI is collected from the individual during the WIC Overseas application/personal interview process, or telephone consult (where face-to-face interview is not possible).

The following forms are used for the information collection:

- WF-1 Participant Information Form English (31 Jan 23)
- WF-1A Participant Information Form German (31 Jan 23)
- WF-1B Participant Information Form Japanese (31 Jan 21)
- WF-1C Participant Information Form Korean (31 Jan 23)

k. 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 must be consistent.

☒ Yes ☐ No

If "Yes," enter SORN System Identifier

SORN Identifier, not the Federal Register (FR) Citation. Consult the DoD Component Privacy Office for additional information or <http://dpcl.d.defense.gov/Privacy/SORNs/>
or

If a SORN has not yet been published in the Federal Register, enter date of submission for approval to Defense Privacy, Civil Liberties, and Transparency Division (DPCLTD). Consult the DoD Component Privacy Office for this date.

If "No," explain why the SORN is not required in accordance with DoD Regulation 5400.11-R: Department of Defense Privacy Program.

l. What is the National Archives and Records Administration (NARA) approved, pending or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?

(1) NARA Job Number or General Records Schedule Authority.

(2) If pending, provide the date the SF-115 was submitted to NARA.

(3) Retention Instructions.

FILE NUMBER: 911-21

FILE TITLE: Overseas Participant Information Management System, Women, Infants and Children Program (PIMSWIC) Consolidated and Local File (Hard Copy)

DISPOSITION: Temporary. Cut off hard copy records upon termination of patient's eligibility or withdrawal of participant from WIC Overseas Program. Transfer to consolidated PIMSWIC Facility in San Antonio, TX 6 months after cutoff. Destroy 3 years after cutoff.

m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.

- (1) If this system has a Privacy Act SORN, the authorities in this PIA and the existing Privacy Act SORN should be similar.
- (2) If a SORN does not apply, 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) Cite the specific provisions of the statute and/or EO that authorizes the operation of the system and the collection of PII.
 - (b) If direct statutory authority or an Executive Order does not exist, indirect statutory 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) If direct or indirect authority does not exist, 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 must be identified.

10 U.S.C. 1060a, Special supplemental food program; 42 U.S.C. Chapter 13A, Child Nutrition; 7 CFR Part 246, Special Supplemental Nutrition Program for Women, Infants and Children; 32 CFR 199.23, Special Supplemental Food Program; HA Policy 09-004, Policy Memorandum for Women, Infants, and Children Overseas Program; and E.O. 9397 (SSN), as amended.

n. Does this DoD information system or electronic collection have an active and approved Office of Management and Budget (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 ☐ No ☐ Pending

- (1) If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.
- (2) If "No," explain why OMB approval is not required in accordance with DoD Manual 8910.01, Volume 2, "DoD Information Collections Manual: Procedures for DoD Public Information Collections."
- (3) If "Pending," provide the date for the 60 and/or 30 day notice and the Federal Register citation.

0720-0030 Expiring 3/31/2026