

Document Title: Managed Care Support Contractor Award Fee Satisfaction Surveys (7 separate Surveys)

Privacy Reviewer: TMA Privacy and Civil Liberties Office (Privacy Office)

Initial Review Date: 6/1/2012; Questions submitted by Privacy Office 6/14/12; Responses to Privacy Office questions received 7/20 and 7/24/2012

Final Review Date: 7/31/2012

Disposition: Privacy Advisory Recommended

TMA Privacy and Civil Liberties Office (Privacy Office)
Internal Review Checklist

 X Thorough analysis of DMDC document

The DoD sponsor of these Surveys is TRICARE Management Activity. The principal investigator for these Surveys is Patrick Koepl of Deloitte Consulting LLP (Deloitte). This analysis is based on the DMDC document (Supporting_Statement_for_Information_Collections_NGBSS_12April) as modified and supplemented by the following documents received from Ms. Golson on July 18, 2012:

1. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – West [CONUS]);
2. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – North [CONUS]);
3. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – South [CONUS]);
4. Health Care Services and Support (T3 Overseas Beneficiary Satisfaction Survey);
5. TRICARE Dual Eligible Fiscal Intermediary Contract (TDEFIC) Satisfaction Survey;
6. TRICARE Mail Order Pharmacy Satisfaction Survey; and
7. Dental Services and Support Satisfaction Survey,

plus answers to the Privacy Office’s questions received from Ms. Godby of Deloitte on July 20 and July 24, 2012 (collectively, the “Survey Documentation”). The Survey Documentation provided sufficient information to permit the Privacy Office to conduct a Privacy Act review of the above Surveys.

 X Statement of purpose check

TRICARE uses managed care support services (MCSS) contractors to provide a network of health care providers and/or health care services which supplements the direct care services provided to Military Health System (MHS) beneficiaries. Each quarter, the quality of these MCSS contractors is evaluated through various means including the Managed Care Support Contractor Award Fee Satisfaction Surveys.

- X Timeframe check
These Surveys are fielded on an ongoing basis and the results are submitted quarterly.
- X Beneficiaries affected check
Each quarter the Surveys are administered over the telephone to a random sampling of MHS beneficiaries who attended a relevant outpatient clinical encounter within the past 30 days and possess a valid telephone number known to MHS. The goal is to obtain 402 responses for each Survey. Since surveyors are given a script which instructs them to only interview a particular person, or their guardian depending on the Survey, an individual outside the scope of a Survey should not be included in the results.
- X Reporting by subgroup check
The maximum number of individuals who can participate in a Survey is every MHS beneficiary who attended a relevant outpatient clinical encounter within the past 30 days and receives a telephone call to complete a Survey. No subgroups are created from the Survey responses.
- X Sampling check
With the exception of TRICARE Mail Order Pharmacy Satisfaction Survey question 1A, results are reported as a percentage of the participants who chose each multiple choice answer and the Survey questions are extremely general. Question 1A is a free response question, but answers are reviewed by the analysts and anything considered personally identifiable information (PII) is permanently deleted. Therefore, the minimum amount of participants should not be a concern.
- X Miscellaneous/unique identifiers check
Once a Survey is completed, the telephone number and other PII needed to administer that Survey can no longer be linked to the results. With the exception of TRICARE Mail Order Pharmacy Satisfaction Survey question 1A, all questions are broad in nature and not designed to record any PII. Question 1A is a free response question which asks about the beneficiary's prior experiences with Express Scripts and could result in the collection of PII. However, PII found in those answers is pertinently deleted such that no PII remains in the data set or is included in a report.
- X Access to survey check
IBOPE Zogby International (Zogby International) is responsible for surveying participants and Deloitte is responsible for analyzing and reporting the results. Both contractors agree to the same restrictions and conditions that apply to the MCSS contractors with respect to the security and confidentiality of the data. Results from these Surveys are only reported to the Administrative Contracting Officers for the MCSS contractors.
- X De-identification segregated from database creation or maintenance
(cannot be the same party or is a HIPAA violation) check
Since the Survey questions do not ask a participant to furnish protected health information, these HIPAA-related issues do not appear to be a concern.

- X Crosswalk collection – min. necessary vs. limited dataset vs. de-identified check
 Since the Survey questions do not ask a participant to furnish protected health information, these HIPAA-related issues do not appear to be a concern.
- N/A Sponsors monitors the work of contractors check
 This was not specified.
- X All work product is owned by the government, if not, subject to destruction check
 The Contractor shall not retain any of the information collected through these Surveys.
- X “Not Totally Anonymous” check
 Results are always reported in aggregate form.
- X Telephone collection check
 If a person has received the relevant outpatient services within the past 30 days, has a telephone number known to MHS, and is randomly chosen to participate in a Survey, the surveyors attempt to contact that individual up to 6 times. All Surveys include an instruction list which states that only the beneficiary, or in some cases their guardian, should be contacted. If an individual requests alternative contact arrangements with regards to the medical treatment which results in their receiving a Survey, that request is honored when administering their Survey.
- N/A Verify accuracy of citations check
- N/A Purpose crosswalk with SORN check
-
- N/A Privacy Act Statement is required for **collection**
- X Privacy Advisory is required for **use**

Point of Contact/Program Office – Submissions Certification		
Criteria	Completed	Not Applicable
PAS Draft		X
Survey Instrument/Tool	X	
DMDC Application	X	
Any corresponding documents that would be material to the system/program.	X	

Analysis:

TRICARE uses MCSS contractors to provide a network of health care providers and/or health care services which supplements the direct care services provided to MHS beneficiaries. The quality of those MCSS contractors is evaluated through various means including the Managed Care Support Contractor Award Fee Satisfaction Surveys. Within that program are the following Surveys:

1. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – West [CONUS]);
2. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – North [CONUS]);
3. Health Care Services and Support (T3 Beneficiary Satisfaction Survey – South [CONUS]);
4. Health Care Services and Support (T3 Overseas Beneficiary Satisfaction Survey);
5. TRICARE Dual Eligible Fiscal Intermediary Contract (TDEFIC) Satisfaction Survey;
6. TRICARE Mail Order Pharmacy Satisfaction Survey; and
7. Dental Services and Support Satisfaction Survey,

Each quarter the Surveys are administered over the telephone to a random sampling of MHS beneficiaries who attended a relevant outpatient clinical encounter within the past 30 days and possess a valid telephone number known to MHS. Results are reported to the Administrative Contracting Officers for the MCSS contractors.

With the exception of TRICARE Mail Order Pharmacy Satisfaction Survey question 1A, all questions are multiple choice, broad in nature, and not designed to record any PII. Question 1A is a free response question which asks about the beneficiary's prior experiences with Express Scripts and could result in the collection of PII. However, PII found in those answers is pertinently deleted such that no PII remains in the data set or is included in a report.

This Survey is administered by Zogby International. All eligible individuals are called a maximum of 6 times. The Surveys include an instruction list which states that only the beneficiary, or in some cases their guardian, should be contacted. If an individual requests alternative contact arrangements with regards to the medical treatment which results in their receiving a Survey, that request is honored when administering their Survey. Once a Survey is completed, the telephone number and other PII needed to administer that Survey can no longer be linked to the results.

Both contractors participating in this Survey, Zogby International and Deloitte, agree to the same restrictions and conditions that apply to the MCSS contractors with respect to the security and confidentiality of the data.

TMA Privacy and Civil Liberties Office Recommendations:

The Privacy Office concludes that the collection and use of Survey responses is not part of a Privacy Act system of records. Consequently, the collection of responses through the Survey does not require inclusion of a Privacy Act Statement. *Therefore, the Privacy Act Statement referenced at J14 and J15 in the DMDC document is not required in connection with these Surveys or to complete the DMDC submission package.*

Because participants are not directly asked to provide PII before, after, or during this Survey, a Privacy Advisory should be sufficient. The Privacy Office recommends that each of the seven (7) surveys contain the same Privacy Advisory, and that the Privacy Advisory should be provided before the first survey question is asked by the survey taker. Recommended language for the Privacy Advisory to be included as part of each survey is set out below:

Your participation in this Survey is voluntary. The answers you give will not affect your benefits in any way. Any personally identifiable information you provide will remain private and protected as appropriate under the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act of 1996. You may ask to skip any questions with which you are not comfortable, and you may stop the Survey at any time.

The Privacy Office's analysis and recommendations assume that the actual Survey documents, the methods used to solicit Survey participants, and the manner in which the Survey is conducted are in accordance with the statements made in the Survey Documentation. If any of these assumptions, or information provided in the Survey Documentation is incorrect, the Privacy Office's Analysis and Recommendations may change and may no longer be applicable to the Surveys absent subsequent Privacy Office review.