

SUPPORTING STATEMENT - PART A

(MHS GENESIS Patient Registration Module & Patient Portal – 0720-XXXX)

1. Need for the Information Collection

The information collection requirement is necessary to provide and document medical care; determine eligibility for benefits and entitlements; adjudicate claims; determine whether a third party is responsible for the cost of MHS provided healthcare and recover that cost; and evaluate fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard. Obtaining this information is essential for the Department of Defense (DoD) to provide medical care and recover costs.

This collection of information is authorized by the following:

- 10 U.S.C. 8111, “Sharing of Department of VA and DoD Healthcare Resources”;
- 10 U.S.C. 1104, “Sharing of Healthcare Resources with the Department of Veterans Affairs”;
- Pub. L. 97-174, “VA/DoD Health Resources Sharing Act”;
- Pub. L. 107-314, “National Defense Authorization, Defense Health Programs” ;
- 10 U.S.C. 136, “Under Secretary of Defense for Personnel and Readiness”;
- 10 U.S.C. Chapter 55, “Medical and Dental Care”;
- 42 U.S.C. Chapter 32, “Third Party Liability for Hospital and Medical Care”;
- 32 CFR Part 199, “Civilian Health and Medical Program of the Uniformed Services (CHAMPUS)”;
- DoD Instruction 6025.18, “Privacy of Individually Identifiable Health Information in DoD Health Care Programs”;
- DoD Regulation 6025.18-R, “DoD Health Information Privacy Regulation”;
- DoD Instruction 6040.45, “DoD Health Record Life Cycle Management”;
- DoD Instruction 6015.23, “Foreign Military Personnel Care and Uniform Business Offices in Military Treatment Facilities (MTFs)”;
- Executive Order 13478, “Amendment to Executive Order 9397 Relating to Federal Agency Use of Social Security Numbers”.

2. Use of the Information

Information is collected from a variety of sources. The primary source of information collection is when a patient comes into an MTF, and medical are generated during that medical encounter. Under certain circumstances information may be collected from a family member (e.g., spouse, parent) or a co-worker/colleague (e.g., wounded or injured on job) via interview. MHS GENESIS may also collect information from other DoD information systems by importing data from legacy DoD Electronic Health Record (EHR) systems, such as AHLTA and CHCS,

through system-to-system interfaces that allow medical documents generated in other systems to be stored in MHS GENESIS, or accessible through MHS GENESIS.

Information collection takes place in patient interviews by a healthcare professional (in-person or via telephone) who inputs the information into the MHS GENESIS system. The healthcare professional collects information such as patient medical history, prescription drug information, allergies, reason for visit, and medical vitals. A healthcare provider also collects information from an examination or procedure for input into the system. Lab test and radiology results are also collected for input. Via in-person interviews, administrative information such as information related to billing, scheduling, and demographics is collected and input into the MHS GENESIS system. In these scenarios, respondents do not enter information directly into the system.

A Patient Portal can be used by the respondent to provide limited information and patient controlled data directly into the system via on-line questionnaires and messages. The information collected includes data such as medical history, patient allergies, emergency contact, and prescription drug information. The Patient Portal web site is not open to public access. Rather, access is limited only to personnel with current and appropriate affiliation with the DoD Military Health System. Web site access is regulated through DoD Self-service Logon (DS Logon or DSL) which is a secure, self-service logon ID created by the Defense Manpower Data Center (DMDC) as an enterprise identity credential that allows access to individuals affiliated with the DoD.

The information collection requirement is necessary to provide and document medical care; determine eligibility for benefits and entitlements; adjudicate claims; determine whether a third party is responsible for the cost of MHS provided healthcare and recover that cost, and; evaluate fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard. Obtaining this information is essential for DoD providing medical care and recovering costs.

3. Use of Information Technology

100% of responses are collected electronically. Submissions into the electronic health record are collected electronically including by being entered directly into the EHR either by a DoD medical professional or by the patient through the Patient Portal. MHS GENESIS may also collect information electronically from other DoD information systems by importing data electronically from legacy DoD EHR systems, such as AHLTA and CHCS, or from commercial systems located at commercial hospitals, clinics, pharmacies, laboratories, or private medical/healthcare providers in general.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Collections are driven by the health care needs of patients. If collection were conducted less frequently, patient safety would be impacted because the patient's electronic health record would not be current and complete.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Wednesday, December 27, 2017). The 60-Day FRN citation is 83 FRN 61273.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, August 20, 2019. . The 30-Day FRN citation is 84 FRN 43114.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the 60-Day Federal Register Noticed was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is required for this collection and is provided in the Patient Portal.

MHS GENESIS is currently under the EDHA 07 SORN, which can be viewed here:
<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570672/edha-07/>.

A Privacy Impact Assessment (PIA) is required. A draft PIA is provided as a separate document.

Records Retention and Disposition Schedule: “Destroy/Delete 100 years after date of separation of the member from the armed service (service members) (Service Treatment Record (STR)); Destroy/Delete 50 years after separation of member sponsor from the armed service (Non – STR) (330-10-003).”

MHS GENESIS backup and restoration procedures have been identified to enable effective data retention in the case of interruptions or data retrieval purposes. Data quality workflows and procedures are created to ensure a high level of data integrity is maintained within the entire system.

Transactional and configuration databases utilize Symantec NetBackup for backup and recovery. This software is provided by the hosting center facility. It takes nightly snapshots and backups of the databases and stores them. Automated configurations and backup restoration will be managed within the administration console of NetBackup. One full backup is to be maintained for the production system, with 6 incremental backups, spanning 3 weeks. This provides 21 days (3 weeks) of recovery. The backup sizing assumes that the full backup will incur the entire size of the database. The incremental backups are based on the amount of data changed per day. In the production system, per data retention requirements, no files will be deleted; storage grows throughout the life of the program.

11. Sensitive Questions

MHS GENESIS collects information of a sensitive nature. The types of personal information about individuals collected in the system will include:

Social Security Number (SSN)
Truncated SSN
Gender
Race/Ethnicity
Religious Preference

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12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. **MHS GENESIS**

- a. Number of Respondents: 2,870,338
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 2,870,338
- d. Response Time: 7 minutes
- e. Respondent Burden Hours: 334,872.8 hours

2. **Total Submission Burden**

- a. Total Number of Respondents : 2,870,338
- b. Total Number of Annual Responses : 2,870,338
- c. Total Respondent Burden Hours : 334,872.8 hours

b. Labor Cost of Respondent Burden

1. **MHS GENESIS**

- a. Number of Total Annual Responses: 2,870,338
- b. Response Time : 7 minutes
- c. Respondent Hourly Wage: \$26.25
- d. Labor Burden per Response : \$3.06
- e. Total Labor Burden : \$8,790,410.12

2. **Overall Labor Burden**

- a. Total Number of Annual Responses : 2,870,338
- b. Total Labor Burden : \$8,790,410.12

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

1. **MHS GENESIS**

- a. Number of Total Annual Responses: 2,870,338
- b. Processing Time per Response: 7 minutes
- c. Hourly Wage of Worker(s) Processing Responses: \$26.25
- d. Cost to Process Each Response : \$3.06
- e. Total Cost to Process Responses : \$8,790,410.12

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses : 2,870,338
- b. Total Labor Burden : \$8,790,410.12

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$ \$22,316,272.00
- f. Other: \$20,257,457.00
- g. Total : \$42,573,729.00

1. Total Operational and Maintenance Costs: \$ 42,573,729.00
2. Total Labor Cost to the Federal Government: \$ 8,790,410.12
3. Total Cost to the Federal Government : \$ 51,364,139.12

15. Reasons for Change in Burden

This is a new collection with a new associated burden

16. Publication of Results

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act and the Department of Defense (DoD) "Blanket Routine Uses", these records or information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

- To the Department of Veterans Affairs (VA) for the purpose of providing medical care to former service members and retirees, to determine the eligibility for or entitlement to benefits, to coordinate cost sharing activities, and to facilitate collaborative research activities between the DoD and VA.
- To the Department of Health and Human Services (HHS) and its components for the purpose of conducting research and analytical projects and to facilitate collaborative research activities between DoD and HHS.
- To the Congressional Budget Office (CBO) for projecting costs and workloads, associated with DoD Medical benefits.
- To local and state government and agencies for compliance with local laws and regulations governing control of communicable diseases, preventive medicine and safety, child abuse, and other public health and welfare programs.
- To the Social Security Administration (SSA) for verification of benefit eligibility and death data.

- To federal offices and agencies involved in the documentation and review of defense occupational and environmental exposure data, including the National Security Agency, the Army Corps of Engineers, National Guard, and the Defense Logistics Agency.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.