

Professional Qualifications Medical/Peer Reviewers
DHA Form 780, 20140820 Draft
Privacy Act Review

Applicable SORN: No system of records notice (SORN) will be required in connection with information collected via the Professional Qualifications Medical/Peer Reviewers, DHA Form 780, 20140820 Draft (Draft DHA 780). The form will collect from medical professionals who are applying to be or who are currently engaged as medical/peer reviewers for TRICARE. It will collect their professional qualifications to conduct medical and/or peer reviews facilitated by the Appeals, Hearings, and Claims Collection Division, DHA Office of the General Counsel. These professional qualifications establish why a medical professional is competent to participate in a medical and/or peer review, and may be shared with authorized persons to confirm those professional qualifications.

The Privacy Act, as implemented within DoD by DoD 5400.11-R, Department of Defense Privacy Program, only applies to “individuals[.]” That definition excludes commercial entities and people when acting in an entrepreneurial capacity. Since Draft DHA 780 will only collect identifiable information about medical professionals to determine whether they should be engaged or retained as medical and/or peer reviewers, the entrepreneurial exception should apply to any identifiable information collected via Draft DHA 780. Since DoD 5400.11-R will not apply to any information collected via Draft DHA 780, a SORN will not be required.

Authorities: 10 U.S.C. Chapter 55, Medical and Dental Care; 32 CFR Part 199, Civilian Health and Medical Program of the Uniformed Services (CHAMPUS); TRICARE Operations Manual 6010.56-M, Chapter 7, Section 1, paragraph 3.0, Reviewer Qualifications and Participation; and TRICARE Operations Manual 6010.56-M, Chapter 12, Section 3, Reconsideration Procedures.

Privacy Act Statement Not Required: Since information collected via Draft DHA 780 will not be subject to DoD 5400.11-R, a Privacy Act Statement should not be provided.

We recommend removing the Privacy Act Statement currently displayed on Draft DHA 780.