



Date PIA submitted for review:

November 16, 2022

Privacy Impact Assessment for the VA Boundary called<sup>1</sup>:

# Area Baltimore

## Mid-Atlantic District

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<sup>1</sup> The completion of Veterans Affairs Privacy Impact Assessments (PIAs) is mandated for any rulemaking, program, Boundary, or practice that collects or uses PII under the authority of the E-government Act of 2002 (44 U.S.C. § 208(b)) and VA Directive 6508, Implementation of Privacy Threshold Analysis and Privacy Impact Assessment.

**Sites within Boundary:**

<i>Sites</i>	<i>Station Numbers</i>
1) Baltimore VA Medical Center	512
2) Loch Raven VA Medical Center	512GB
3) Perry Point VA Medical Center	512A5
4) Cambridge VA Outpatient Clinic	512GA
5) Eastern Baltimore County VA Outpatient Clinic	512GF
6) Fort Meade VA Outpatient Clinic	6192
7) Glen Burnie VA Outpatient Clinic	512GC
8) Pocomoke City VA Outpatient Clinic	512GE
9) Veteran Benefits Administration (VBA), Baltimore Regional Office (BRO)	313
10) Annapolis National Cemetery	801
11) Baltimore National Cemetery	802
12) Loudon Park National Cemetery	816
13) Aberdeen Vet Center	02092
14) Annapolis Vet Center	0235V
15) Baltimore Vet Center	0201V
16) Dundalk Vet Center	0236V
17) Elkton Vet Center	0209
18) Salisbury Vet Center	02091

**Boundary Contacts:**

**Boundary Key Stakeholders**

<b>Name</b>	<b>Title (PO, ISSO, AM, MD/SPS Staff, Facility Director)</b>	<b>Phone Number</b>	<b>Email Address</b>	<b>Applicable Site (VBA, VHA, NCA, Program Office)</b>
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## Abstract

*The abstract provides the simplest explanation for “what does the boundary do?” and will be published online to accompany the PIA link.*

**Area Baltimore** is an Information Boundary that consists of Veterans Health Administration (VHA) VA Maryland Health Care System (VAMHCS) which contains the Baltimore, Loch Raven and Perry Point Medical Centers, along with five Outpatient Clinics (Cambridge VA Clinic, Eastern Baltimore County VA Clinic, Fort Meade VA Clinic, Glen Burnie VA Clinic, Pocomoke City VA Clinic); Veterans Benefits Administration (VBA) Baltimore Regional Office (BRO); National Cemetery Administration sites; Annapolis National Cemetery, Baltimore National Cemetery and Loudon Park National Cemetery; and VHA Vet Centers in Aberdeen, Annapolis, Baltimore, Dundalk, Elkton, and Salisbury Maryland. The Boundary environment consists of components such as workstations, laptops, portable computing devices, terminals, servers, printers, and IT enabled networked medical devices that are owned, managed, and maintained by the facilities.

The Boundary provides operational connectivity services necessary to enable users’ access to information technology resources throughout the enterprise including those within the facility, between facilities, resources hosted at data centers, and connectivity to other systems. Network connectivity rules are enforced by VA approved baselines for router and switch configurations. The Boundary system environment also includes as applicable, subsystem storage utilities such as tape drives, optical drives, disk drives, network area storage (NAS), storage access networks (SAN), archival appliances, special purpose systems, and tier 2 storage solutions. The Boundary encompasses the management, operational, and technical security controls associated with IT hardware, consisting of servers, routers, switches, hubs, gateways, peripheral devices, desktop/laptops, and OS software. The Boundary employs a myriad of routers and switches that connect to the VA network. The Area Baltimore utilizes the VA Enterprise Cloud (VAEC).

## Overview

*The overview is the most important section of the PIA. A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA. The overview should contain the following elements:*

- *The Boundary name and the name of the sites within it.*
- *The business purpose of the Boundary and how it relates to the program office and agency mission.*
- *Whether the Boundary is leveraging or accessing Enterprise repositories such as Veterans Benefits Management System, SharePoint, VistA, etc. and if so, a description of what PII/PHI from the Enterprise repositories is being used by the facilities in the Boundary.*
- *Documentation of any repository not maintained at the enterprise level, unlike Veterans Benefits Management System, SharePoint, VistA, etc. used by the facilities to collect, use, disseminate, maintain, or create PII/PHI.*
- *Any external information sharing conducted by the facilities within the Boundary.*
- *A citation of the legal authority to operate the Boundary.*
- *Whether the completion of this PIA will result in circumstances that require changes to business processes*
- *Whether the completion of this PIA could potentially result in technology changes*

- *Does the Boundary host or maintain cloud technology? If so, does the Boundary have a FedRAMP provisional or agency authorization?*

The **Area Baltimore** itself does not collect, use, disseminate, maintain, or store PII/PHI. VHA, VBA and NCA Facilities located within the **Area Baltimore** IT Boundary all access VA Enterprise IT systems respectively, hosted and maintained outside of this boundary. These are VISTA, VBMS, MEM, etc.

Only PII/PHI collected and used by the facilities within the Boundary will be referenced in this document since the Boundary does not maintain, disseminate, or store information accessed by each facility. All repositories used by the facilities are at the enterprise level.

The facilities within the Boundary collect, use, and/or disseminate PII/PHI that is maintained and stored within enterprise systems such as VistA, VBMS, BOSS/AMASS, MBMS, etc. There are individual PIAs that contain detailed information on the maintenance, dissemination and sharing practices, and storage of the PII/PHI for each Enterprise system accessed by the facilities.

The area is sharing information externally with Social Security Administration (SSA), Department of Defense (DOD), Internal Revenue Service (IRS) and others as listed in 5.1

Legal authorities to operate the Area Baltimore are the Veterans Health Administration – Organization and Functions, Title 38, U.S.C., Chapter, 73 §7301(a), Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA) of 1996.

Area Baltimore has Authority to Operate granted on May 20, 2022.

The completion of this PIA will not result in any business or technology changes for the area.

The Boundary is using the VA Enterprise Cloud (VAEC) which is at the enterprise level and is outside of the Boundary. Further information can be found in the VAEC PIA.

The applicable SORs for **Area Baltimore** include:

*Applicable SORs*

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Applicable System of Records (SORs)</b>
VHA	<ul style="list-style-type: none"> <li>• Non-VA Fee Basis Records-VA, SOR 23VA10NB3</li> <li>• Patient Medical Records-VA, SOR 24VA10A7</li> <li>• Veteran, Patient, Employee, and Volunteer Research and Development Project Records- VA, SOR 34VA10</li> <li>• Community Placement Program-VA, SOR 65VA122</li> <li>• Health Care Provider Credentialing and Privileging Records-VA, SOR 77VA10E2E</li> <li>• Veterans Health Information Systems and Technology Architecture (VistA) Records-VA, SOR 79VA10</li> <li>• Income Verification Records-VA, SOR 89VA10NB</li> <li>• Automated Safety Incident Surveillance and Tracking System-VA, SOR 99VA13</li> </ul>

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Applicable System of Records (SORs)</b>
	<ul style="list-style-type: none"> <li>• The Revenue Program Billings and Collection Records-VA, SOR 114VA10</li> <li>• National Patient Databases-VA, SOR 121VA10A7</li> <li>• Enrollment and Eligibility Records- VA 147VA10NF1</li> <li>• VHA Corporate Data Warehouse- VA 172VA10A7</li> <li>• Health Information Exchange - VA 168VA005</li> <li>• Personnel Records – SORN 76VA05</li> <li>• Applicants for Employment under Title 38, USC-VA, SORN 02VA135</li> <li>• Individuals Serving on a Fee Basis or Without Compensation (Consultants, Attending’s, and Others or Paid Indirectly through a Disbursement Agreement)</li> <li>• Personnel Records-VA, SORN 14VA05</li> <li>• Telephone Service for Clinical Care Records- VA - SORN 113VA112</li> <li>• Patient Advocate Tracking System (PATS) – SORN 100VA10NS10</li> <li>• Police and Security Records – SORN 103VA07B</li> </ul>
VBA	<ul style="list-style-type: none"> <li>• Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA, SOR 58VA21/22/28</li> </ul>
NCA	<ul style="list-style-type: none"> <li>• Veterans and Dependents National Cemetery Gravesite Reservation Records - VA SOR 41VA41</li> <li>• Veterans and Dependents National Cemetery Interment Records - VA SOR 42VA41</li> <li>• Veterans (Deceased) Headstone or Marker Records - VA, SOR 48VA40B</li> <li>• VA National Cemetery Pre-Need Eligibility Determination Records - VA SOR 175VA41A</li> </ul>

## Section 1. Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, Boundary, or technology being developed.

### 1.1 What information is collected, used, disseminated, or created, by the facilities within the Boundary?

*Identify and list all PII/PHI that is collected and stored in the Boundary, including Individually Identifiable Health Information (IIHI), Protected Health Information (PHI), and Privacy- Protected Information. For additional information on these information types and definitions, please see VA Directives and Handbooks in the 6500 series. If the Boundary creates information (for example, a score, analysis, or report), list the information the Boundary is responsible for creating.*

*If a requesting Boundary receives information from another Boundary, such as a response to a background check, describe what information is returned to the requesting Boundary.*

*This question is related to privacy control AP-1, Authority to Collect, and AP-2, Purpose Specification.*

Please check any information listed below that the facilities within the boundary collects. If additional PII/PHI is collected, please list those in the text box below:

- |  |  |   |
|--|--|---|
| <input checked="" type="checkbox"/> Name (First, Middle, Last, Suffix if applicable)                                   | <input checked="" type="checkbox"/> Vehicle License Plate Number                   | <input checked="" type="checkbox"/> Veteran Dependent Information                     |
| <input checked="" type="checkbox"/> Social Security Number   | <input checked="" type="checkbox"/> Internet Protocol (IP) Address Numbers         | <input checked="" type="checkbox"/> Disclosure Requestor Information                  |
| <input checked="" type="checkbox"/> Date of Birth  | <input checked="" type="checkbox"/> Current Medications                            | <input checked="" type="checkbox"/> Death Certificate Information                     |
| <input checked="" type="checkbox"/> Mother's Maiden Name   | <input checked="" type="checkbox"/> Previous Medical Records                       | <input checked="" type="checkbox"/> Criminal Background                               |
| <input checked="" type="checkbox"/> Personal Mailing Address   | <input checked="" type="checkbox"/> Race/Ethnicity                                 | <input checked="" type="checkbox"/> Education Information                             |
| <input checked="" type="checkbox"/> Personal Phone Number(s)   | <input checked="" type="checkbox"/> Tax Identification Number                      | <input checked="" type="checkbox"/> Gender  |
| <input checked="" type="checkbox"/> Personal Fax Number  | <input checked="" type="checkbox"/> Medical Record Number                          | <input checked="" type="checkbox"/> Tumor PHI Statistics                              |
| <input checked="" type="checkbox"/> Personal Email Address   | <input checked="" type="checkbox"/> Next of Kin                                    | <input checked="" type="checkbox"/> Other Unique Identifying Information (list below) |
| <input checked="" type="checkbox"/> Emergency Contact Information (Name, Phone Number, etc. of a different individual) | <input checked="" type="checkbox"/> Guardian Information                           |   |
| <input checked="" type="checkbox"/> Financial Account Information  | <input checked="" type="checkbox"/> Electronic Protected Health Information (ePHI) |   |
| <input checked="" type="checkbox"/> Health Insurance Beneficiary Numbers   | <input checked="" type="checkbox"/> Military History/Service Connection            |   |
| <input checked="" type="checkbox"/> Account numbers  | <input checked="" type="checkbox"/> Service-connected Disabilities                 |   |
| <input checked="" type="checkbox"/> Certificate/License numbers  | <input checked="" type="checkbox"/> Employment Information                         |   |

The Area Baltimore also collects uses, disseminates, creates or maintains the following information:

Birth Sex

Self-Identified Gender

Medical Records of Non-VA Providers

Service Information

Benefit Information

Relationship to Veteran

Funeral Information

Date of Death

Marital Status

Diagnosis of Disease; Treatment Notes; Prescribed Medications; Laboratory Results; Problem lists of ongoing persistent medical needs; Reports of Radiology procedures; Surgical Procedures; Historical health information in the form a Health History and Discharge Summaries from inpatient hospitalization

### PII Mapping of Components (Servers/Database)

**Area Baltimore** consists of **12 key components** (servers/databases). Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected within **Area Baltimore** and the reasons for the collection of the PII are in the **Mapping of Components Table in Appendix B of this PIA**.

## **1.2 What are the sources of the information for the facilities within the Boundary?**

*List the individual, entity, or entities providing the specific information identified above. For example, is the information collected directly from the individual as part of an application for a benefit, or is it collected from other sources such as commercial data aggregators?*

*Describe why information from sources other than the individual is required. For example, if a facility program within the Boundary is using data from a commercial aggregator of information or data taken from public Web sites, state the fact that this is where the information is coming from and then in question 1.3 indicate why the facility is using this source of data.*

*If a facility program within the Boundary creates information (for example, a score, analysis, or report), list the facility as a source of information.*

*This question is related to privacy controls DI-1, Data Quality, and IP-1, Consent.*

The information that resides within the facilities in the Boundary is collected, maintained, and/or disseminated comes from a variety of sources. The largest amount of data comes directly from individuals - including veterans and their dependents, volunteers and other members of the public, clinical trainees, and VA employees and contractors. For example: items such as names, social security numbers, dates of birth are collected from the individual on healthcare enrollment forms (VA Form 10-10EZ), or other paperwork the individual prepares. An application for employment contains the same, or similar, information about employees.

Depending on the type of information, it may also come from Veterans Benefits Administration (VBA), the VA Health Eligibility Center (HEC), VA Network Authorization Office (NAO) for non-VA Care payments, and non-VA medical providers, Department of Defense (DOD), Internal Revenue Service (IRS), Office of Personnel Management (OPM), Social Security Administration (SSA), Federal Emergency Management Agency (FEMA), Federal Bureau of Investigation (FBI).

Criminal background information is obtained from Electronic Questionnaires for Investigations Processing (E-QIP) and National Crime Information Center (NCIC) and used to confirm employment and/or volunteer eligibility and to assist the VA Police Service while conducting internal investigations.

For NCA, the MEM - BOSS component receives data from funeral homes, next of kin, and other points of contact for the decedent for burial services. The AMAS component collects data directly from individuals as part of a monument application. Given the purpose of the Memorial Benefits System – the individuals for which the data is being collected are decedent Veterans or their deceased family members – so the information will always need to be collected on their behalf.

Additional sources include:

- VA, Compensation, Pension, Education and Rehabilitation Records
- VA, Veterans and Beneficiaries Identification Records Location Subsystem
- VA, 36VA00 Veterans and Armed Forces Personnel United States Government Life Insurance Records
- VA, 46VA00 Veterans, Beneficiaries and Attorneys United States Government Insurance Award Records
- VA, Veterans and Beneficiaries Identification and Records Location (BIRLS)
- Compensation, Pension, Education and Rehabilitation (covers BDN and Corporate databases)
- Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records



- VA, 53VA00 Veterans Mortgage Life Insurance
- VA, Veterans Benefit Management System (VBMS)
- Identity and Access Management (IAM) Single Sign-On Internal (SSOi) and User Provisioning: Memorial Benefits Management System (MBMS) Salesforce and Amazon Web Services (AWS) uses two VA IAM services to validate user login information: SSOi and User Provisioning.
- Veterans Benefits Management System (VBMS) eFolder via iHub: Provides access to a widget allowing National Cemetery Scheduling Office (NCSO) case managers the ability to view documents in eFolder to assist in eligibility verification of Veterans and Next-of-Kin. The data viewed is viewed for eligibility determinations and not transmitted or stored in MBMS Salesforce or AWS.
- VA Master Persons Index Enterprise (MPIe): Provides the ability to search the authoritative data source for Veterans, MPI, to ensure that they are not creating duplicate contact records in applications built on the Salesforce platform.
- Direct conversation with individual Veterans or NOK who call the NCSO representatives.

### 1.3 How is the information collected?

*This question is directed at the means of collection from the sources listed in question 1.2. Information may be collected directly from an individual, received via electronic transmission from another Boundary, or created by the boundary itself. Specifically, is information collected through technologies or other technology used in the storage or transmission of information in identifiable form?*

*If the information is collected on a form and is subject to the Paperwork Reduction Act, give the form's OMB control number and the agency form number.*

*This question is related to privacy controls DI-1, Data Quality, and IP-1, Consent.*

*Means of Collection Table*

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Means of Collection</b>
VHA	Information collected directly from patients, employees and/or other members of the public is collected using paper forms (such as the VA Form 10-10EZ enrollment form for VA health care), or interviews and assessments with the individual. Much of the information provided by veterans or other members of the public, such as address and phone number, next of kin and emergency contact information, and similar information are assumed to be accurate because it is provided directly by the individual. Additionally, information entered into an individual's medical record by a doctor or other medical staff is also assumed to be accurate.

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Means of Collection</b>
VBA	<p>There are many VA forms used by Veterans to apply for and/or make adjustments to pending benefits. All VBA benefit forms are located at <a href="http://www.va.gov/vaforms/">http://www.va.gov/vaforms/</a>. The URL of the associated privacy statement is: <a href="http://www.va.gov/privacy/">http://www.va.gov/privacy/</a>. VBA forms can be downloaded from this site, filled in and printed to be delivered in paper form. All collected information is used to determine eligibility for benefits, process ratings and to provide payments via the Department of Treasury.</p> <p>The VBA toll free number for veterans is 1-800-827-1000. Clients are referred to and transferred to the Regional Office of Jurisdiction, where they can provide a service representative with required information. All collected information is used to determine eligibility for benefits, process ratings and to provide payments via the Department of Treasury. VBA employees may also contact a Veteran directly to obtain clarifying information for a claim for benefits.</p>
NCA	<p>MEM does receive information electronically from other systems, such as Veterans Benefits Management System (VBMS) eFolder via iHub, Identity and Access Management (IAM) Single Sign-On Internal (SSOi) and User Provisioning, VA Master Persons Index Enterprise (MPIe), and direct conversation with individual Veterans or Next of Kin. Information is received, reviewed, and collected through inbound and outbound telephone engagement, in-person contact, postal mail, and fax, to the National Cemetery Scheduling Office (NCSO), Applicant Assistance Unit (AAU), national cemeteries, and other NCA offices.</p> <p>Data is manually entered into all NCA systems except for the Enterprise Eligibility Office Automation System (EOAS). EOAS receives applications and documents via direct upload from VA.gov. Forms and supporting documentation required to verify memorial benefits eligibility, such as the DD-214, are scanned/uploaded into the document repositories such as FEITH, EOAS, and eFolder and stored in the Memorial Data Warehouse.</p> <p>AMAS processes approximately 360,000 claims for standard government headstones or markers (VA Form 40-1330) and Monument and Presidential Memorial Certificate Request (VA Form 40-0247) applications annually. Data from the forms are manually entered into the system. Forms and supporting documentation required to verify memorial benefits eligibility, such as the DD214, are scanned/uploaded</p>

Information related to an employee’s employment application may be gathered from the applicant for employment, which is provided to an application processing website, USA Jobs.

Information from outside resources comes to the Area Boundary using several methods; Site to Site (S2S) VPN Tunnel, Electronic Data Interchange (EDI), Facsimile, Electronic Upload, Secure Web

Portal, Email, United Parcel Service (UPS), United States Postal Service (USPS). Chief among these sources, are the DoD, SSA, and IRS. The DoD provides military records, including medical records compiled when the patient was a member of the US Military. Income information is verified using information from the Social Security Administration (SSA) and the Internal Revenue Service (IRS). The VBA provides records which include the type and percentage of granted ‘service-connected’ disabilities, the dates of service-connected disability ratings, and, in some cases, the VBA populates patient demographics to the Area Baltimore in order to provide a Compensation and Pension examination to a claimant. These outside records are transmitted through a secure shared computer linkage.

These data collections may be done using secure web portals, VPN connection, e-mail, and facsimile. Information is collected directly from patients, employees and/or other members of the public is collected using forms such as VA Form 10-10 EZ, EC, HS or CG for enrollment in VA health care, DD-214 or interviews and assessments with the individual.

NCA: The Memorial Benefits Management System (MBMS) is under development to replace the BOSS-E and AMAS system suite. MBMS has replaced BOSS-E as the primary scheduling tool at the NCSO and will replace all NCA systems to include BOSS, AMAS, EOAS, Web-Presidential Memorial Certificates (Web-PMC), and Memorial Enterprise Letters (MEL) by 2025.

**1.4 What is the purpose of the information being collected, used, disseminated, created, or maintained?**

*Include a statement of why the particular PII/PHI is collected, maintained, used, or disseminated in the Boundary is necessary to the program’s or agency’s mission. Merely stating the general purpose of the Boundary without explaining why this particular type of information should be collected and stored is not an adequate response to this question.*

*If the Boundary collects, uses, disseminates, or maintains publicly available or commercial data, include a discussion of why commercial data is relevant and necessary to the Boundary’s purpose. This question is related to privacy control AP-2, Purpose Specification.*

The purposes of the information from Veterans and other members of the public collected, maintained, and processed by **Area Baltimore** are as varied as the types of information collected.

Much of the information collected is maintained, used, and disseminated to ensure that Veterans and other eligible individuals obtain the medical and mental health treatment they require. Additional information, such as bank account information and insurance information are used to process claims and requests for benefits. Other purposes include determination of legal authority for providers and other clinical staff to practice medicine and/or subject matter expertise, release of information request responses, and research/analysis of data.

*Purpose of Information Collection Table*

<i>Site Type: VBA/VHA/NCA or Program Office</i>	<i>Purpose of Information Collection</i>
VHA	<ul style="list-style-type: none"> <li>• To determine eligibility for health care and continuity of care</li> <li>• Emergency contact information in cases of emergency situations such as medical emergencies</li> <li>• Provide medical care</li> </ul>

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Purpose of Information Collection</b>
	<ul style="list-style-type: none"> <li>• Communication with Veterans/patients and their families/emergency contacts</li> <li>• Determine legal authority for providers and health care workers to practice medicine and/or subject matter expertise</li> <li>• Responding to release of information request</li> <li>• Third party health care plan billing, e.g., private insurance</li> <li>• Statistical analysis of patient treatment</li> <li>• Contact for employment eligibility/verification</li> <li>• Chronical the care provided to VA patients by community healthcare partners</li> </ul>
VBA	<ul style="list-style-type: none"> <li>• Compensation and Pension</li> <li>• Education</li> <li>• Vocational Rehabilitation and Employment</li> <li>• Loan Guaranty</li> <li>• Insurance</li> </ul> <p>The primary services of the benefit systems entail the receipt, processing, tracking and disposition of Veterans’ application for benefits and requests for assistance, and the general administration of legislated benefit programs. Information is collected to provide all entitled benefits in the most complete and effective manner.</p>
NCA	<ul style="list-style-type: none"> <li>• MEM collects and maintains information to verify the identity and eligibility of the Veteran, decedent, beneficiary, and personal representative/funeral home for burial and monument benefits and monument services.</li> </ul>

**1.5 How will the information collected and used by the facilities be checked for accuracy? How often will it be checked?**

*Discuss whether and how often information stored in a facility within the Boundary is checked for accuracy. Is information within the facility checked against any other source of information (within or outside your organization) before the information is used to make decisions about an individual? For example, is there a computer matching agreement in place with another government agency? For a facility within the Boundaries that receives data from internal data sources or VA IT systems, describe the checks to ensure that data corruption has not occurred during transmission.*

*If the Boundary checks for accuracy by accessing a commercial aggregator of information, describe this process and the levels of accuracy required by the contract. This question is related to privacy controls DI-1, Data Quality, and DI-2, Data Integrity and Integrity Board.*

Information that is collected and used directly from enterprise systems have additional details regarding checks for accuracy in their own enterprise level PIAs.

Much of the information provided by veterans or other members of the public, such as address and phone number, next of kin and emergency contact information, and similar information are assumed to be accurate because it is provided directly by the individual. Additionally, information entered an individual’s medical record by a doctor or other medical staff is also assumed to be accurate and is not verified.

Information is checked through the VBA to verify eligibility for VA benefits. Information about military service history is verified against official DoD military records and income information is verified using information from the Social Security Administration (SSA) and the Internal Revenue Service (IRS).

Employee, contractor, student, and volunteer information is obtained by automated tools as well as obtained directly by the individuals. The Federal Bureau of Investigation and Office of Personnel Management are contacted to obtain background reviews. Provider credentialing information is obtained from a variety of education resources.

Health Administration Services also conduct random audits of registration data to ensure accuracy.

For NCA, standard operating procedures (SOPs) are in place at NCA offices and cemeteries to perform quality control on data related to each case. As cases progress through the queues from NCSO case managers to the cemetery office staff, additional data integrity checks are conducted. Final data integrity checks are performed by cemetery operations staff who perform the interment after services.

**1.6 What specific legal authorities, arrangements, and agreements defined the collection of information?**

*List the full legal authority for operating the Boundary, specifically the authority to collect the information listed in question 1.1. Provide the authorities in a manner understandable to any potential reader, i.e., do not simply provide a legal citation; use statute names or regulations in addition to citations. Legal authorities include Federal laws, regulations, statutes, and Executive Orders.*

*This question is related to privacy control AP-1, Authority to Collect*

*Legal Authority Table*

<b>Site Type: VBA/VHA/NC A or Program Office</b>	<b>Legal Authority</b>
VHA	<ul style="list-style-type: none"> <li>• Veterans Health Administration – Organization and Functions, Title 38, U.S.C., Chapter 73, § 7301(a)</li> <li>• Health Insurance Portability and Accountability Act of 1996(HIPAA) (codified in scattered sections of title 42 U.S. Code);45 Code of Federal Regulations (C.F.R). parts 160 and 164 (HIPAA Privacy and Security Rules</li> </ul>

Legal Authority Table

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Legal Authority</b>
VHA	<ul style="list-style-type: none"> <li>• Privacy Act of 1974</li> <li>• Freedom of Information Act (FOIA) 5 USC 552</li> <li>• VHA Directive 1605.01 Privacy &amp; Release of Information</li> <li>• VA Directive 6500 Managing Information Security Risk: VA Information Security Program.</li> <li>• Health Information Technology for Economic and Clinical Health (HITECH) Act, Title XIII of Division A and Title IV of Division B of the American Recovery and Reinvestment Act of 2009 (ARRA),</li> </ul>
VBA	<ul style="list-style-type: none"> <li>• Veterans Benefits, Title 38, United States Code (U.S.C.), Chapter 5, § 501(b)</li> </ul>
NCA	<ul style="list-style-type: none"> <li>• Veterans Benefits, Title 38, United States Code (U.S.C.), Chapter 5, § 501(a), 501(b), and Chapter 24, Sections 2400-2404.</li> <li>• 5 U.S.C. § 552a, Freedom of Information Act of 1996, As Amended By Public Law No. 104---231, 110 Stat. 3048</li> <li>• 5 U.S.C. § 552a, Privacy Act of 1974, As Amended</li> <li>• 48VA40B – Veterans (Deceased) Headstone or Marker Records-VA, per Title 38, United States Code: Sections 501(a), 501(b), and Chapter 24, Sections 2400-24</li> <li>• Public Law 100---503, Computer Matching and Privacy Act of 1988</li> <li>• Privacy Act of 1974; U.S Code title 5 USC section 301 title 38 section 1705, 1717, 2306-2308 &amp; Title38, US Code section 7301 (a) and Executive Order 9397</li> <li>• OMB Circular A---130, Management of Federal Information Resources, 1996</li> <li>• OMB Memo M---10---23, Guidance for Agency Use of Third---Party Websites</li> <li>• OMB Memo M---99---18, Privacy Policies on Federal Web Sites</li> <li>• OMB Memo M---03---22, OMB Guidance for Implementing the Privacy Provisions</li> <li>• OMB Memo M---07---16, Safeguarding Against and Responding to the Breach of PII</li> <li>• The Health Insurance Portability and Accountability Act of 1996 (HIPAA)</li> <li>• State Privacy Laws</li> <li>• The legal authority is 38 U.S.C 7601-7604 and U.S.C 7681-7683 and Executive Order 9397</li> </ul>

## **1.7 PRIVACY IMPACT ASSESSMENT: Characterization of the information**

*Consider the specific data elements collected and discuss the potential privacy risks and what steps, if any are currently being taken to mitigate those identified risks.*

*Consider the following Fair Information Practice Principles (FIPPs) when assessing the risk to individual privacy:*

*Principle of Purpose Specification: Explain how the collection ties with the purpose of the underlying mission of the organization and its enabling authority.*

*Principle of Minimization: Is the information directly relevant and necessary to accomplish the specific purposes of the program?*

*Principle of Individual Participation: Does the program, to the extent possible and practical, collect information directly from the individual?*

*Principle of Data Quality and Integrity: Are there policies and procedures for VA to ensure that personally identifiable information is accurate, complete, and current?*

*This question is related to privacy control AR-1, Governance and Privacy Program, and AR-2, Privacy Impact and Risk Assessment.*

Follow the format below when entering your risk assessment:

### **Privacy Risk:**

VA **Area Baltimore** collects Personally Identifiable Information (PII) such as names, social security numbers and a variety of other Sensitive Personal Information (SPI), such as Protected Health Information (PHI) on veterans, members of the public and VA employees and contractors. Due to the highly sensitive nature of this data, there is a risk that, if the data were accessed by an unauthorized individual or otherwise breached, serious personal, professional, or financial harm may result for the individuals affected.

### **Mitigation:**

VA **Area Baltimore** employs a variety of security measures designed to ensure that the information is not inappropriately disclosed or released. These measures include access control, awareness and training, audit and accountability, certification, accreditation, and security assessments; configuration management, contingency planning, identification and authentication, incident response, maintenance, media protection, physical and environmental protection, planning, personnel security, risk assessment, systems and services acquisition, system and communications protection, and system and information integrity. The area employs all security controls in the respective high impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in the National Institute of Standards and Technology (NIST) Special Publication 800-37 and specific VA directives

All employees with access to Veteran's health information are required to complete the Privacy and HIPAA Focused training as well as the VA Privacy and Information Security Awareness & Rules of Behavior training annually. The VA enforces two-factor authentication by enforcing smartcard logon requirements. PIV cards are issued to employees, contractors, and partners in accordance with HSPD-12. The Personal Identity Verification (PIV) Program is an effort directed and managed by the Homeland Security Presidential Directive 12 (HSPD-12) Program Management Office

(PMO). IT Operations and Services (ITOPS) Solution Delivery (SD) is responsible for the technical operations support of the PIV Card Management System. Information is not shared with other agencies without a Memorandum of Understanding (MOU) or other legal authority.

## Section 2. Uses of the Information

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

### 2.1 Describe how the information within the Boundary will be used in support of the program's business purpose.

*Identify and list each use (both internal and external to VA) of the information collected or maintained.*

*This question is related to privacy control AP-2, Purpose Specification.*

- **Name (First, Middle, Last, Suffix if applicable):** Used to identify the patient during appointments and in other forms of communication
- **Social Security Number:** Used as a patient identifier and as a resource for verifying income Information with the Social Security Administration
- **Date of Birth:** Used to identify age and confirm patient identity
- **Mother's Maiden Name:** Used to confirm patient identity
- **Mailing Address (Home, Temporary or Confidential):** Used for communication, billing purposes and calculate travel pay
- **Zip Code:** Used for communication, billing purposes, and to calculate travel pay
- **Phone Number(s) ( Home, Work and Cellphone):** Used for communication, confirmation of appointments and conduct Telehealth appointments
- **Fax Number:** used to send forms of communication and records to business contacts, Insurance companies and health care providers
- **Email Address:** used for communication and MyHealtheVet secure communications
- **Emergency Contact Information (Name, Phone Number, etc. of a different individual):** Used in cases of emergent situations such as medical emergencies.
- **Financial Account Information:** Used to calculate co-payments and VA health care benefit eligibility
- **Health Insurance Beneficiary Account Numbers:** Used to communicate and bill third part Health care plans
- **Certificate/License numbers:** Used to track and verify legal authority to practice medicine and Licensure for health care workers in an area of expertise.
- **Vehicle License Plate Number:** Used for assignment of employee parking and assignment of parking during events
- **Internet Protocol (IP) Address Numbers:** Used for configuration and network connections. Network Communication allows information to be transferred from one Information Technology System to another.



- **Current Medications:** Used within the medical records for health care purposes/treatment, prescribing medications and allergy interactions.
- **Previous Medical Records:** Used for continuity of health care
- **Race/Ethnicity:** Used for patient demographic information and for indicators of ethnicity-related diseases.
- **Next of Kin:** Used in cases of emergent situations such as medical emergencies. Used when patient expires and in cases of patient incapacity.
- **Guardian Information:** Used when patient is unable to make decisions for themselves.
- **Electronic Protected Health Information (ePHI):** Used for history of health care treatment, during treatment and plan of treatment when necessary.
- **Military history/service connection:** Used to evaluate medical conditions that could be related to location of military time served. It is also used to determine VA benefit and health care eligibility. For NCA, it is used to determine eligibility and memorial, headstone or niche cover data.
- **Service-connected disabilities:** Used to determine VA health care eligibility and treatment plans/programs
- **Employment information:** Used to determine VA employment eligibility and for veteran contact, financial verification.
- **Veteran dependent information:** Used to determine benefit support and as an emergency contact person.
- **Disclosure requestor information:** Used to track and account for patient medical records released to requestors.
- **Death certificate information:** Used to determine date, location and cause of death.
- **Date of Death:** Used to verify spousal and beneficiary relationship to Veteran, at time of death.
- **Marital Status:** Used to verify spousal and beneficiary eligibility
- **Service Information:** Used to verify eligibility
- **Benefit Information:** Used to verify burial benefits
- **Relationship to Veteran:** Used to determine relationship to Veteran
- **Funeral Home Information:** Used to contact funeral home or other service coordinator information
- **Criminal background information:** Used to determine employment eligibility and during VA Police investigations.
- **Education Information:** Used for demographic background information for patients and as a determining factor for VA employment in areas of expertise. Basic educational background, e.g., High School Diploma, college degree credentials.
- **Gender/Birth Sex:** Used as patient demographic, identity and indicator for type of medical care/provider and medical tests required for individual.
- **Self-Identified Gender Identity:** Used to be inclusive to patients whose sex at birth does not match their gender identity.
- **Tumor PII/PHI Statistics:** Used to evaluate medical conditions and determine treatment plan
- **Diagnosis of Disease which includes:** Treatment notes, Prescribed medications; Laboratory results; Problem lists of ongoing persistent medical needs; Reports of Radiology procedures;

Surgical Procedures; Historical health information in the form a Health History and Discharge Summaries from inpatient hospitalization. – Used for current and future patient care.

- **Medical Records from Non-VA Providers:** Used for care planning.
- **Medical Record Number:** Used to identify a patient within the medical record system without using their social security number as their identifier.
- **Tax Identification Number:** Used for employment, eligibility verification .

The data may be used for approved research purposes. The data may be used also for such purposes as assisting in the scheduling of tours of duties and job assignments of employees; the scheduling of patient treatment services, including nursing care, clinic appointments, surgery, diagnostic and therapeutic procedures; the repair and maintenance of equipment and for follow-up activities to determine that the actions were accomplished and to evaluate the results; the registration of vehicles and the assignment and utilization of parking spaces; to plan, schedule, and maintain rosters of patients, employees and others attending or participating in sports, recreational or other events (e.g., National Wheelchair Games, concerts, picnics); for audits, reviews and investigations conducted by staff of the health care facility, the Network Directors Office, VA Central Office, and the VA Office of Inspector General (OIG); for quality assurance audits, reviews, investigations and inspections; for law enforcement investigations; and for personnel management, evaluation and employee ratings, and performance evaluations.

## **2.2 What types of tools are used to analyze data and what type of data may be produced?**

*Many facilities within a Boundary sift through large amounts of information in response to a user inquiry or programmed functions. Facilities may help identify areas that were previously not obvious and need additional research by agents, analysts, or other employees. Some facilities perform complex analytical tasks resulting in, among other types of data, matching, relational analysis, scoring, reporting, or pattern analysis. Describe any type of analysis facilities within the Boundary conduct and the data that is created from the analysis.*

*If the facility creates or makes available new or previously unutilized information about an individual, explain what will be done with the newly derived information. Will it be placed in the individual's existing record? Will a new record be created? Will any action be taken against or for the individual identified because of the newly derived data? If a new record is created, will the newly created information be accessible to Government employees who make determinations about the individual? If so, explain fully under which circumstances and by whom that information will be used.*

*This question is related to privacy controls DI-1, Data Quality, DI-2, Data Integrity and Integrity Board, and SE-1, Inventory of Personally Identifiable Information*

The VA **Area Baltimore** uses statistics and analysis to create three (3) types of general reports that provide the VA a better understanding of patient care and needs. These reports are:

1. Reports created to analyze statistical analysis on case mixes.
2. Analyze the number of places and geographical locations where patients are seen to assess the volume of clinical need.

3. Analyze appointment time-frame data to track and trend averages of time.

These reports may track:

- The number of patients enrolled, provider capacity, staffing ratio, new primary care patient wait time, etc. for Veterans established with a Patient Care Aligned Team (PACT)
- Beneficiary travel summary/benefits
- Workload and cost resources for various services, i.e., mental health, primary care, home dialysis, fee services, etc.
- Daily bed management activity
- Coding averages for outpatient/inpatient encounters
- Satisfaction of Healthcare Experience of Patients (SHEP) data as it pertains to customer satisfaction regarding outpatient/inpatient services
- Unique patient trends
- Clinic wait times

Letters to veterans concerning the progress of their claim are generated periodically, as well as rating decisions and requests for additional information to substantiate the claim. These letters are generated electronically and printed on paper and mailed to the veteran.

**2.3 PRIVACY IMPACT ASSESSMENT: Use of the information. How is access to the PII/PHI determined? Are criteria, procedures, controls, and responsibilities regarding access documented? Does access require manager approval? Is access to the PII/PHI being monitored, tracked, or recorded? Who is responsible for assuring safeguards for the PII/PHI?**

*Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above. Example: Describe if training for users of the project covers how to appropriately use information. Describe the disciplinary programs or Boundary controls (i.e., denial of access) that are in place if an individual is inappropriately using the information.*

*Consider the following FIPPs below to assist in providing a response:*

*Principle of Transparency:* *Is the PIA and SORN, if applicable, clear about the uses of the information?*

*Principle of Use Limitation:* *Is the use of information contained in the facilities relevant to the mission of the project?*

*This question is related to privacy control AR-4, Privacy Monitoring and Auditing, AR-5, Privacy Awareness and Training, and SE-2, Privacy Incident response.*

The controls in place to assure that the information is handled in accordance with the uses described above include mandatory online information security and Privacy and HIPAA training; face-to-face training for all incoming new employees conducted by the Information System Security Officer and Privacy Officer; regular audits of individuals accessing sensitive information; and formal administrative rounds during which personal examine all areas within the facility to ensure

information is being appropriately used and controlled. At the local level, employees are assigned functional categories which determine the amount of access if any to PII/PHI. The functional categories are reviewed annually between supervisors and their direct reports. They are updated prior to the annual review if the employee's need to access PHI/PII in the performance of their job changes.

## Section 3. Retention of Information

The following questions are intended to outline how long information will be retained after the initial collection.

### 3.1 What information is retained by the facilities within the Boundary?

*Identify and list all information collected from question 1.1 that is retained by the facilities within the Boundary.*

*This question is related to privacy controls DM-1, Minimization of Personally Identifiable Information, and DM-2, Data Retention and Disposal*

The **Area Baltimore** itself, does not retain information.

- Name (First, Middle, Last, Suffix if applicable)
- Social Security Number (SSN)
- Date of Birth
- Mother's Maiden Name
- Mailing Address (Home, Temporary or Confidential)
- Zip Code
- Phone Number(s) (Home, Work and Cellphone)
- Fax Number
- Email Address (Personal or Work)
- Emergency Contact Information
- Financial Account Information
- Health Insurance Beneficiary Account Numbers
- Certificate/License Numbers
- Internet Protocol (IP) Address Numbers
- Current Medications
- Previous Medical Records
- Race/Ethnicity
- Next of Kin
- Guardian Information
- Electronic Protected Health Information (ePHI)
- Military History/Service Connection
- Service-Connected Disabilities
- Employment Information

- Veteran Dependent Information
- Disclosure Requestor Information
- Death Certificate Information
- Criminal Background Information
- Education Information
- Gender/Birth Sex
- Self-Identified Gender Identity
- Tumor PII/PHI
- Diagnosis of Disease
- Medical Records from Non-VA Providers
- Medical Record Number
- Tax Identification Number
- Service Information
- Benefit Information
- Relationship to Veteran
- Funeral Home Information
- Name and address of Next-of Kin
- Military service data, applicant’s name and address, place of burial, burial services and headstone data

**3.2 How long is information retained by the facilities?**

*In some cases, VA may choose to retain files in active status and archive them after a certain period of time. State active file retention periods, as well as archived records, in number of years, for the information and record types. For example, financial data held within your Boundary may have a different retention period than medical records or education records held within your Boundary, please be sure to list each of these retention periods.*

*The VA records officer should be consulted early in the development process to ensure that appropriate retention and destruction schedules are implemented.*

*This question is related to privacy control DM-2, Data Retention and Disposal.*

*Length of Retention Table*

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Length of Retention</b>
VHA	<ul style="list-style-type: none"> <li>• Financial Records: Different forms of financial records are retained 1-7 years based on specific retention schedules. Please refer to VA Record Control Schedule (RCS)10-1, Part Two, Chapter Four- Finance Management</li> <li>• Patient medical records are retained for a total of 75 years after the last episode of care. (Department of Veterans Affairs Record Control Schedule (RCS)10-1, Part Three, Chapter Six- Healthcare Records, Item 6000.1a. and 6000.1d.</li> </ul>

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Length of Retention</b>
	<ul style="list-style-type: none"> <li>• Official Human Resources Personnel File: Folder will be transferred to the National Personnel Records Center (NPRC) within 30 days from the date an employee leaves the VA. NPRC will destroy 65 years after separation from Federal service. (Department of Veterans Affairs Record Control Schedule (RCS)10-1, Part Two, Chapter Three- Civilian Personnel, Item No. 3000.1</li> <li>• Office of Information &amp; Technology (OI&amp;T) Records: These records are created, maintained and disposed of in accordance with Department of Veterans Affairs, Office of Information &amp; Technology RCS 005-1.</li> </ul>
VBA	<ul style="list-style-type: none"> <li>• Compensation, pension, and vocational rehabilitation claims folders are retained at the servicing regional office until they are inactive for three years, after which they are transferred to the Records Management Center (RMC) for the life of the Veteran.</li> <li>• Official legal documents (e.g., birth certificates, marriage licenses) are returned to the claimant after copies are made for the claimant’s file. At the death of the Veteran, these records are sent to the Federal Records Center (FRC) and maintained by the National Archives and Records Administration (NARA) in accordance with NARA policy.</li> <li>• Once a file is electronically imaged and accepted by VBA, its paper contents (with the exception of documents that are the official property of the Department of Defense, and official legal documents), are destroyed in accordance with Records Control Schedule VB–1 Part 1 Section XIII, as authorized by NARA.</li> <li>• Documents that are the property of the Department of Defense are either stored at the RMC or transferred to NARA and maintained in accordance with NARA policy.</li> <li>• Vocational Rehabilitation counseling records are maintained until the exhaustion of a Veteran’s maximum entitlement or upon the exceeding of a Veteran’s delimiting date of eligibility (generally, ten or twelve years from discharge or release from active duty), whichever occurs first, and then destroyed.</li> <li>• Automated storage media containing temporary working information are retained until a claim is decided, and then destroyed. All other automated storage media are retained and disposed of in accordance with disposition authorization approved by NARA.</li> <li>• Education electronic folders are retained at the servicing Regional Processing Office. Education folders may be destroyed in accordance with the times set forth in the Veterans Benefits Administration Records Management, Records Control Schedule VB–1, Part 1, Section VII, as authorized by NARA.</li> <li>• Employee productivity records are maintained for two years after which they are destroyed by shredding.</li> </ul>

<i>Site Type: VBA/VHA/NCA or Program Office</i>	<i>Length of Retention</i>
NCA	<ul style="list-style-type: none"> <li>• Veterans (Deceased) Headstone or Marker Records-VA SORN 48VA40B: Retained indefinitely</li> </ul>

**3.3 Has the retention schedule been approved by the VA records office and the National Archives and Records Administration (NARA)? If so, please indicate the name of the records retention schedule.**

*An approved records schedule must be obtained for any IT system that allows the retrieval of a record via a personal identifier. The VA records officer will assist in providing a proposed schedule. The schedule must be formally offered to NARA for official approval. Once NARA approves the proposed schedule, the VA records officer will notify the Boundary owner.*

*This question is related to privacy control DM-2, Data Retention and Disposal.*

**Retention Schedule Table**

<i>Site Type: VBA/VHA/NCA or Program Office</i>	<i>Retention Schedule</i>
VHA	Department of Veterans Affairs, Veterans Health Administration Records Control Schedule 10-1  Department of Veterans Affairs, Office of Information & Technology Records Control Schedule 005-1
VBA	Veterans Benefits Administration Records Management Veterans Benefits-1
NCA	48VA40B – Veterans (Deceased) Headstone or Marker Records- Veterans (Deceased) Headstone or Marker Records-VA, SOR 48VA40B.

**3.4 What are the procedures for the elimination of PII/PHI?**

*Explain how records are destroyed or eliminated at the end of the retention period. Please give the details of the process. For example, are paper records shredded on site, or by a shredding company and accompanied by a certificate of destruction, etc.?*

*This question is related to privacy control DM-2, Data Retention and Disposal*

Information within the **Area Baltimore** is destroyed by the disposition guidance of RCS 10-1, VB-1. Paper documents are disposed of in contracted locked boxes and are destroyed to an unreadable state in accordance with the Department of Veterans’ Affairs VA Directive 6371, Destruction of Temporary Paper Records, (April 8, 2014) by the VA approved shredding vendor. Once destroyed by the vendor, certificates of destruction are received.

Additionally, the Area Baltimore follows Field Security Service (FSS) Bulletin #209.1 National Media Sanitization and Destruction Program Electronic Media Sanitization dated October 4, 2021 - FSS - All Documents **as well as** FSS Standard Operating Procedures (SOP) MP-6 Electronic Media Sanitization

Electronic data and files of any type, including Protected Health Information (PHI), Sensitive Personal Information (SPI), Human Resources records, and more are destroyed in accordance with the **Department of Veterans' Affairs Directive 6500 VA Cybersecurity Program (January 23, 2019)**. When required, this data is deleted from their file location and then permanently deleted from the deleted items or Recycle bin. Magnetic media is wiped and sent out for destruction per VA Directive 6500. Digital media is shredded or sent out for destruction per VA Directive 6500.

At VBA, paper records are shredded on-site by a shredding company, witnessed by the Records Management Officer, and are accompanied by a certificate of destruction. Non-paper records maintained on magnetic media are destroyed by erasing the magnetic media using an approved software to digitally overwrite the media. The media is then shredded on-site by the contracted shredding company, witnessed by the Records Management Officer per VBA Directive 6300.

At NCA, paper records are shredded on site to a degree that definitively ensures that they are not readable or reconstructed to any degree per VA Directive 6371 or by a contracted shredding company, tracked with VA Form 7468, destruction log or certificate of destruction.

### **3.5 Does the Boundary include any facility or program that, where feasible, uses techniques to minimize the risk to privacy by using PII for research, testing, or training?**

*Organizations often use PII for testing new applications or information systems prior to deployment. Organizations also use PII for research purposes and for training. These uses of PII increase the risks associated with the unauthorized disclosure or misuse of the information. Please explain what controls have been implemented to protect PII used for testing, training and research. Have policies and procedures been developed to minimize the use of PII for testing, training, and research?*

*This question is related to privacy control DM-3, Minimization of PII Used in Testing, Training and Research*

Yes, where feasible to minimize the risk to privacy using PII for research, testing, or training: no VA presentations or associated materials that may become publicly available shall contain PII or information exempt from release under FOIA. Presentations are reviewed by the Privacy Officer to ensure that PII is not included unless the appropriate authorizations have been obtained.

For NCA, PII collected by MEM is not used for research, testing or training.

### **3.6 PRIVACY IMPACT ASSESSMENT: Retention of information**

*Discuss the risks associated with the length of time data is retained and what steps, if any, are currently being taken to mitigate those identified risks.*

*While we understand that establishing retention periods for records is a formal process, there are policy considerations behind how long a project keeps information. The longer a project retains information, the longer it needs to secure the information and assure its accuracy and integrity. The proposed schedule should match the requirements of the Privacy Act to keep the minimum amount of PII for the minimum amount of time, while meeting the Federal Records Act. The schedule should align with the stated purpose and mission of the Boundary.*



Consider the following FIPPs below to assist in providing a response:

Principle of Minimization: Does the project retain only the information necessary for its purpose? Is the PII retained only for as long as necessary and relevant to fulfill the specified purposes?

Principle of Data Quality and Integrity: Has the PIA described policies and procedures for how PII that is no longer relevant and necessary is purged?

This question is related to privacy controls DM-1, Minimization of Personally Identifiable Information, and DM-2, Data Retention and Disposal.

Follow the format below:

**Privacy Risk:** There is a risk that the information maintained by **Area Baltimore** could be retained for longer than is necessary to fulfill the VA mission. Records held longer than required are at greater risk of being unintentionally released, breached, or exploited for reasons other than what is described in the privacy documentation associated with the information.

**Mitigation:** To mitigate the risk posed by information retention, **Area Baltimore** adheres to the VA RCS schedules for each category or data it maintains. When the retention data is reached for a record, the medical center will carefully dispose of the data by the determined method as described in question 3.4. The **Area Baltimore** ensures that all personnel involved with the collection, use and retention of data are trained in the correct process for collecting, using and retaining this data. A Records Management Officer (RMO), Privacy Officer (PO) and an Information System Security Officer (ISSO) are assigned to the boundary to ensure their respective programs are understood and followed by all to protect sensitive information from the time it is captured by the VA until it is finally disposed of. Each of these in-depth programs have controls that overlap and are assessed annually to ensure requirements are being met and assist staff with questions concerning the proper handling of information.

At the VBA, file plans are created by each individual employee and Division contain the records control schedule disposition for each record type (VB-1). File plans are to be updated as records are added or removed from inventory.

NCA: File plans are created by each individual office/facility, according to NCA RCS and GRS. File plans are updated and inventoried annually or as needed for business.

## Section 4. Internal Sharing/Receiving/Transmitting and Disclosure

The following questions are intended to define the scope of information sharing/receiving/transmitting within VA.

**4.1 With which internal organizations are facilities within the Boundary sharing/receiving/transmitting information with? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?**

**Note: Question #3.5 (second table) in the Boundary Privacy Threshold Analysis should be used to answer this question.**

*Identify and list the names of any program offices, contractor-supported IT systems, and any other organization or IT Boundary within VA with which information is shared. State the purpose for the internal sharing. If you have specific authority to share the information, provide a citation to the authority.*

For each interface with a system outside each facility, state what specific data elements (PII/PHI) are shared with the specific program office, contractor-supported IT system, and any other organization or IT system within VA.

Describe how the information is transmitted. For example, is the information transmitted electronically, by paper, or by some other means? Is the information shared in bulk, on a case-by-case basis, or does the sharing partner have direct access to the information?

This question is related to privacy controls AP-2, Purpose Specification, AR-3, Privacy Requirements for Contractors and Service Providers, AR-8, Accounting of Disclosures, TR-1, Privacy Notice, and UL-1, Internal Use.

**Data Shared internally by facilities within the Boundary including VA Enterprise Systems Organizations**

<b>List the Program Office or IT System information is shared/received with</b>	<b>List the purpose of the information being shared /received with the specified program office or IT System</b>	<b>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT System</b>	<b>Describe the method of transmittal</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
Department of Veterans Affairs General Counsel Office (OGC)	Tort Claims/Health Care	Name, DOB, Address, Diagnosis, Test Results, Procedures, other parts of the medical record appropriate to the request	Electronic, Mail delivery (USPS/UPS/FedEx)	VAMHCS
Identity and Access Management (IAM)	User access control	PII - Identity Access Information for User access control: Name, Address, SSN (Data Encrypted)	REST Web Service API (HTTP)	Annapolis, Baltimore and Loudon Park Cemeteries
Memorial Benefits Management System (MBMS)	Benefits, decedent, claimant, requestor, and beneficiary information	Birth Date, Email, Name, Gender, Ethnicity/Race, Address, Date of Death, Marital Status, Military honors, Relationship to Veteran, SSN, Phone, County, Military Service Release from Active Duty (RAD) Date, Veteran's Period of Service, and Veteran's War Period, personal representative or Funeral Home	Information may be transmitted upon request in a written or verbal format based on the individual request, Electronically shared via network connections	Annapolis, Baltimore and Loudon Park Cemeteries

<b>List the Program Office or IT System information is shared/received with</b>	<b>List the purpose of the information being shared /received with the specified program office or IT System</b>	<b>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT System</b>	<b>Describe the method of transmittal</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
Burial Operations Support System - Enterprise (BOSS-E)	To support legacy users	Memorial Information; Birth Date, Email, Name, Gender, Address, Date of Death, Marital Status, Military honors, Relationship to Veteran, SSN, Phone, County, Military Service Release from Active Duty (RAD) Date, Veteran's Period of Service, and Veteran's War Period	Secure Database Connection - Oracle Forms based application backed by an Oracle 12c database	Annapolis, Baltimore and Loudon Park Cemeteries
VA Master Persons Index (MPI)-Enterprise (MPIe)	To have the ability to search the authoritative data source for Veterans, MPI, to ensure that they are not creating duplicate contact records in applications built on the Salesforce platform.	First Name, Middle Name, Last Name, Social Security Number (SSN), Date of Birth (DOB), Gender, Phone Number, Place of Birth (POB) City, Place of Birth (POB) State, Mother's Maiden Name	REST Web Service API (HTTP)	Annapolis, Baltimore and Loudon Park Cemeteries
VA Veterans Benefits Administration (VBA) - VBMS	Benefit Eligibility	Name, Social Security Number, DOB, Mailing Address, Phone Numbers, Email address, Financial Assessment test, Service-Connected disability diagnosis, Health Status, Compensation and pension exam notes	Compensation and Pension Record Interchange (CAPRI) electronic software package	Baltimore Regional Office
VA Research	VA Research Studies	Name, Social Security Number, DOB Mail and Email Address, Phone Numbers, Emergency Contact Information, Current medications, Previous Medical Records and Race/Ethnicity as	Information may be transmitted upon request in an electronic, written or verbal format based on the individual request	VAMHCS

<b>List the Program Office or IT System information is shared/received with</b>	<b>List the purpose of the information being shared /received with the specified program office or IT System</b>	<b>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT System</b>	<b>Describe the method of transmittal</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
		appropriate to the request		
VA Tumor Registry	Tumor Registry	Diagnosis, Procedures, Tumor Status, Treatment Outcome, Survivor Tracking, Treatment, Type Demographics, problem lists	Electronic tumor registry package	VAMHCS
VA HIV Registry	HIV Registry	Diagnosis & Procedures, HIV/AIDS Status, Treatment Outcomes, Survivor Tracking, Treatment Type Demographics, problem lists	Electronic HIV registry package	VAMHCS
VA Network Authorization Office – Non-VA Care payments	Health/Medical Payment Authorization	Demographics, diagnoses, medical history, service connection, provider orders, VHA recommendation/ approval for non-VA care.	Fee basis claim system (FBCS) authorization software program	VAMHCS
Virtual Lifetime Electronic Record (VLER)	To share medical information/Demographics, diagnoses, medical history, service connection, provider orders, with community providers.	Medical information Demographics, diagnoses, medical history, service connection, provider orders, with community providers.	Electronic via EDI interface/ paper via US postal service	VAMHCS
Research and Development Service CICERO –Collaborative Institutional Comprehensive Evaluation of Research Online	To have protocols reviewed and approved.	Demographic, Age, Gender and Diagnosis is shared to complete approved research studies	Protocols are reviewed and approved electronically through the CICERO web portal.	VAMHCS

<b>List the Program Office or IT System information is shared/received with</b>	<b>List the purpose of the information being shared /received with the specified program office or IT System</b>	<b>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT System</b>	<b>Describe the method of transmittal</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
Department of Veteran Administrations Central Office (VACO)	To assist Veterans	System Log Files, sample clinical data that may contain protected health information (PHI) appropriate to the agreements and individually identifiable information (III) Name, Social Security Number, DOB, Mailing Address, Phone Numbers, Email address	Compensation and Pension Record Interchange (CAPRI) electronic software package.	VAMHCS  Baltimore Regional Office
Veterans Health Administration VistA	Electronic Health Record	Area Boundary Log files, sample clinical data that may contain Protected Health Information (PHI)	Electronically pulled from VistA thru Computerized Patient Record Area Boundary (CPRS)	VAMHCS  Baltimore Regional Office
Consolidated Mail Outpatient Pharmacy (CMOP)	Pharmacy Benefits	Veteran's name, address, full SSN, DOB, provider's name, name/quantity of medication(s)	VistA (VistA)	VAMHCS
Austin Acquisition Center	ACC	Demographics, Social Security Numbers and Banking information is shared for Payroll	Electronically-Data is automatically transmitted from our VistA system	VAMHCS
Maryland Vet Centers	Care and services	Pertinent Personally Identifiable Information (PII), Protected Health Information (PHI), and Individually Identifiable Information (III) for treatment/planning purposes.	Electronically viewed through CPRS	Maryland Vet Centers

#### **4.2 PRIVACY IMPACT ASSESSMENT: Internal sharing and disclosure**

*Discuss the privacy risks associated with the sharing of information within the Department and what steps, if any, are currently being taken to mitigate those identified risks.*

*This question is related to privacy control UL-1, Internal Use.*

Follow the format below:

**Privacy Risk:** The internal sharing of data is necessary individuals to receive benefits at the Area Baltimore However, there is a risk that the data could be shared with an inappropriate VA organization or institution which could result in a breach of privacy and disclosure of PII/PHI to unintended parties or recipients.

**Mitigation:** Safeguards implemented to ensure data is not sent to the wrong VA organization are employee security and privacy training and awareness and required reporting of suspicious activity. Use of secure passwords, access for need-to-know basis, Personal Identification Verification (PIV) Cards, Personal Identification Numbers (PIN), encryption, and access authorization are all measures that are utilized within the facilities. Access to sensitive information and the systems where the information is stored is controlled by the VA using a “least privilege/need to know” policy. Access must be requested and only the access required by VA persons or processes acting on behalf of VA persons is to be requested or granted.

### **Section 5. External Sharing/Receiving and Disclosure**

The following questions are intended to define the content, scope, and authority for information sharing external to VA, which includes Federal, State, and local governments, and the private sector.

**5.1 With which external organizations (outside VA) is information shared/received? What information is shared/received, and for what purpose? How is the information transmitted and what measures are taken to ensure it is secure?**

**Is the sharing of information outside the agency compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If not, please describe under what legal mechanism the facility is allowed to share the information in identifiable form or personally identifiable information outside of VA.**

**Note: Question #3.6 in the Boundary Privacy Threshold Analysis should be used to answer this question.**

*Identify and list the names of any Federal, State, or local government agency or private sector organization with which information is shared.*

*For each interface with a Boundary outside VA, state what specific data elements (PII/PHI) are shared with each specific partner.*

*What legal mechanisms, authoritative agreements, documentation, or policies are in place detailing the extent of the sharing and the duties of each party? For example, is the sharing of data compatible with your SORN? Then list the SORN and the applicable routine use from the SORN. Is there a Memorandum of Understanding (MOU), Computer Matching Agreement (CMA), or law that mandates the sharing of this information?*

*Describe how the information is transmitted to entities external to VA and what security measures have been taken to protect it during transmission.*

This question is related to privacy control UL-2, Information Sharing with Third Parties

**Data Shared with External Organizations**

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
SSA – Social Security Administration	Benefit Eligibility	Name, DOB, Social Security Number, Health Summary, Discharge Summary, Compensation and Pension Exams	National ISA/ MOU	Site to Site (S2S) VPN Tunnel	VAMHCS Baltimore Regional Office
UMMC - FPI Physicians/University of Maryland Medical Center	University Affiliate Patient Care	Name, portions of the electronic medical record	Local ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
Third Party Insurance Agencies / All Health Insurance agencies	For payment of the cost of care for reimbursement for the cost of medical care.	Name, Medical diagnosis excluding 7332 information, procedures, exam type.	BAA, VA Claims Confidentiality Statue 38 USC 5701	Electronic Data Interchange (EDI)	VAMHCS
DOD - Department of Defense (DOD)	Applicants for Employment, Payroll; Coordination of Care	Employment history, Demographics, Social Security Numbers and Banking information	National ISA/MOU; Title 38 USC-VA, SORN 02VA135	Electronic; Site to Site (S2S) VPN Tunnel	VAMHCS
State Reporting/US DHHS - United States Department of Health and Human Services (DHHS)	In the reporting of communicable or other conditions for public protection	Name, Address, DOB, Reason for suspicion of Abuse or Neglect.	Standing letter; Maryland Health and Safety Code	Facsimile	VAMHCS
State Reporting/ US MHSA - United States Maryland Human Services Agency (MHSA)	Reporting suspected abuse and or neglect of adults and or children	For public protection, Name, address, SSN, diagnosis	Standing Letter; Maryland Human Service Agency/Adult & Child Protective Services	Facsimile	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
IRS - Internal Revenue Service (IRS)	Eligibility Verification	Name, SSN, DOB, Financial Information	National ISA/MOU	Secure web portal	VAMHCS Baltimore Regional Office
FDA -Food and Drug Administration (FDA)	The reporting of adverse drug reactions; purposes of quality-of-care management, including detection, treatment	Patient's Name and other relevant health care information in the reporting of adverse drug reactions; purposes of quality-of-care management, including detection, treatment, monitoring, reporting, analysis, and follow-up actions relating to adverse drug reactions	National ISA/MOU  Title 38, USC, Sections 501(a), 5901, 5902, 5903 and 5904.  SORN VA 121VA10 P2	Site to Site (S2S) VPN Tunnel	VAMHCS
SPMP - State prescription monitoring program (SPMP) for MD	State reporting of required schedule medications; including adverse drug reactions and reports	State reporting of required schedule medications; Name, Social Security Number, DOB, Medication Name, Dosage	National Directive	Site to Site (S2S) VPN Tunnel	VAMHCS
Local/State Law Enforcement Agencies/ MD State Police	The data is used to identify the patient in the system and between systems.	Events that are mandated by State law for a provider to report, i.e., gunshots, or requests for information & subpoenas. The data is used to identify the patient in the system and between systems.	Standing letter; Title 38 U.S.C. § 5701 and the federal Privacy Act of 1974, 5 U.S.C. § 522a(b)(3)	Electronically via secure facsimile, hard copies via routine mail;	VAMHCS
Local, State, & Federal Government Agencies; Other Medical Institutions –	When VA refers a patient for hospital or nursing home care or medical services, or authorizes a patient	Name, Social Security Number, DOB, Diagnosis, Portions of the Medical record when VA refers a patient for hospital or nursing home	Title 38, U.S.C, Sections 501(b) and 304; SORN	Electronic, Facsimile	VAMHCS



<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
Hospitals, nursing homes; other medical services	to obtain non-VA medical services	care or medical services, or authorizes a patient to obtain non-VA medical services	VA 24VA10P2		
Office of Personnel Management (OPM)	For background investigations	Name, Social Security Number, DOB, Demographics (Age, Gender, Mailing address) for background investigations.	National ISA/MOU	Electronic, written or verbal format based on the request. Secure facsimile or hard copies via routine mail.	VAMHCS
ROI Access Management Services, LLC D/B/A - Langley	For coding, billing, accounts receivable and financial counseling services	Name, DOB, SSN, Address, Diagnosis, Procedures, Insurance Information for coding, billing, accounts receivable and financial counseling services	National BAA	Secured VPN	VAMHCS
ALPHA4 SOLUTIONS, D/B/A - Alpha Transcriptions	For medical transcription services	Name, Social Security Number, DOB, Diagnosis, Procedures, Test Results for medical transcription services	National ISA/MOU/ BAA	Secured VPN	VAMHCS
Health Net Federal Services - Health Net	For continuation of care for Choice visits.	Name, DOB, SSN, Address, Diagnosis, Procedures, Insurance Information, Service Connection for continuation of care for Choice visits.	National ISA/MOU/ BAA	Secure Facsimile	VAMHCS
State Medical Examiner - MD State Medical Examiner	For cause of death determination	Patient name, SSN, DOB, Gender, Portions of the medical record.	Standing letter	Secure Facsimile	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
Beckman Coulter	The data is used as a means to identify the patient in the system and between systems.	Lab Analyzers that contain PHI. (Patient name, SSN and testing results) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
GE MED-IT	The data is used as a means to identify the patient in the system and between systems.	GE MUSE - CP Interface: The data is used as a means to identify the patient in the system and between systems. (Patient name, SSN, DOB)	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
GETWELL Networks	The data is used as a means to identify the patient in the system and between systems.	Patient Education: The data is used as a means to identify the patient in the system and between systems. (Patient name, SSN, DOB)	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Change Healthcare / FKA Mckesson Technologies	The data is used as a means to identify the patient in the system and between systems.	Radiology PACS: The data is used as a means to identify the patient in the system and between systems (Patient name, SSN, DOB, imaging services)	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
OLYMPUS	The data is used as a means to identify the patient in the system and between systems.	GI Endoworks: (Patient name, SSN, DOB) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
PHILIPS/Intelli-Space Critical Care & Anesthesia	The data is used as a means to identify the patient in the system and between systems.	(ICCA) Clinical Information System for ICU (Patient name, SSN, DOB) The data is used to identify the patient in the system and between systems	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
SCRIPTPRO	The data is used as a means to identify the patient in the system and between systems.	Outpatient Pharmacy prescription filling (Patient name, SSN, DOB) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
SIEMENS	The data is used as a means to identify the patient in the system and between systems.	Lab Analyzers that contain PHI. (Patient name, SSN and testing results) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
SYSMEX	The data is used as a means to identify the patient in the system and between systems.	Lab Analyzers that contain PHI. (Patient name, SSN and testing results) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
TOPCON	The data is used as a means to identify the patient in the system and between systems.	Eye Clinic vision testers/analyzers (Patient name, SSN and testing results) The data is used as a means to identify the patient in the system and between systems.	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
Omnicell	Patient medication administration	Patient medication administration; Name, ID Number, Location, Dosage, Medication Name	National ISA/MOU/ BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Quest	Patient laboratory information	Patient name, SSN, DOB, Test Results.	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
LabCorp	Patient laboratory information	Patient name, SSN, DOB, Test Results.	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
MERGE Healthcare Solutions	Patient Care Support	Name, DOB, SSN, Procedure performed	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
PARATA Systems	Patient Care Support	Name, DOB, Social Security Number, Medication Name, Dosage amount	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
ROCHE Diagnostics	Patient Care Support	Patient Care Support: Name, DOB, Social Security Number, Test Results	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Abbott Laboratories Inc.	Patient Care Support	Name, Medical Record Number, SSN, test results	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Bayer HealthCare LLC	Patient Care Support	Name, Medical Record & Social Security Number	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Philips Healthtech (iSite / Stentor)	The data is used to identify the patient in the system and between systems	Patient name, SSN, DOB. Medical Record Number. The data is used to identify the patient in the system and between systems	ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
VECNA	Pulls patient appointment information from Vista so patients can check in for their appointments thru the kiosk. Information is bi-directionally interfacing with legacy systems. The kiosk performs data collection, processing and input. The data is used as a means to identify the patient in the system and between systems	Demographics, Name, Address, Insurance and appointments for self-verification of information	National ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Varian Medical Systems	The data is used to identify the patient in the system and between systems	Name, Social Security Number, Medical Record Number	ISA/MOU BAA	Site to Site (S2S) VPN Tunnel	VAMHCS
Baltimore City Police	Related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	Name, Address, or Conditions related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	MOU Support Agreement	Secure fax Verbally over the telephone	VAMHCS
Maryland State Police	Related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	Name, Address, or Conditions related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	MOU Support Agreement	Secure fax Verbally over the telephone	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
Cecil County Sheriff's Department	Related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	Name, Address, or Conditions related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	MOU Support Agreement	Secure fax Verbally over the telephone	VAMHCS
Perryville Police Department	Related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	Name, Address, or Conditions related to abuse or neglect, threats of harm or Injuries apparently caused by auto accidents, moving vessels, lethal weapons, gunshots	MOU Support Agreement	Secure fax Verbally over the telephone	VAMHCS
National Crime Information Center (NCIC)	Police verification of criminal information	Police verification of criminal information; name, DOB, SSN, race, sex, weight, height, hair color, eye color, tattoos and scars.	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
Electronic Questionnaire for Investigations (E-QIP)	For background investigations.	Employment; Name, Social Security Number, DOB, Demographics (Age, Gender, Mailing address)	National ISA/MOU	Site to Site (S2S) VPN Tunnel	VAMHCS
Living Legacy Foundation of Maryland	To organ procurement organizations or other entities engaged in the procurement, banking or transplantation of cadaveric organs, eyes or tissue.	Name, DOB, Gender, Age, diagnosis	Local MOU; 45 CFR 164.512 (h):	Verbally via phone call	VAMHCS

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
Shredding Services	Data destruction services for documents temporary records and those eligible for final destruction under VHA RCS 10-1	Documents with Names, DOB, Social Security Numbers, Addresses, Phone Numbers, Diagnoses, Test Results, Procedures, Patient armbands.	National ISA/MOU	Hard copies of the Certificate of Destruction are sent after final destruction. They are sent via email or fax.	VAMHCS
BOSS (Burial Operations Support System)/VBMS – State and Tribal cemeteries	Benefits, decedent, claimant, requestor, and beneficiary information (such as names, addresses, and social security numbers)	Birth Date, Email, Name, Gender, Ethnicity/Race, Address, Date of Death, Marital Status, Military honors, Relationship to Veteran, SSN, Phone, County, Military Service Release from Active Duty (RAD) Date, Veteran’s Period of Service, and Veteran’s War Period, personal representative or Funeral Home	MOU	Site to Site (S2S) VPN	Annapolis, Baltimore and Loudon Park Cemeteries
Salesforce	The MBMS application will need to push/pull data from existing NCA data sources via Rest APIs exposed by MBMS. Functionality build includes Case Management, Eligibility, and Scheduling.	Birth Date, Email, Name, Gender, Ethnicity/Race, Address, Date of Death, Marital Status, Military honors, Relationship to Veteran, SSN, Phone, County, Military Service Release from Active Duty (RAD) Date, Veteran’s Period of Service, and Veteran’s War Period, personal representative or Funeral Home	48VA40B – Veterans (Deceased) Headstone or Marker Records-VA, per Title 38, United States Code: Sections 501(a), 501(b), and Chapter 24, Sections 2400-2404. ISA/MOU between Salesforce and MBMS systems.	Service Based Web Connection	Annapolis, Baltimore and Loudon Park Cemeteries

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT System</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT System</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>	<i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i>
VAEC AWS	AWS hosted in VAEC is the government cloud that will serve as the infrastructure that hosts the BIP platform as a service and subsequent hosted minor application, MBMS.	Birth Date, Email, Name, Gender, Ethnicity/Race, Address, Date of Death, Marital Status, Military honors, Relationship to Veteran, SSN, Phone, County, Military Service Release from Active Duty (RAD) Date, Veteran's Period of Service, and Veteran's War Period, personal representative or Funeral Home	MBMS is a minor application under the BIP Platform ATO – all VAEC AWS agreements are between BIP and VAEC	Hosted Environment	Annapolis, Baltimore and Loudon Park Cemeteries
National Veteran's Service Organizations such as Veterans of Foreign War (VFW), etc.	Benefits and services	Name, Social Security Number, Date of Birth, Mailing Address, Phone Numbers, Email Address, Emergency Contact Information, Financial Account Information, Health Insurance Beneficiary Numbers, Current medications, Previous Medical Records and Race/Ethnicity as appropriate to the request	Title 38 Code of Federal Regulations (CFR) s14.633, Privacy Act HIPAA Privacy Rule  Power of Attorney (POA)	Electronically, verbal, or written in a sentence format. For example, Information may be transmitted upon request in an electronic, written or verbal format based on the individual request	VAMHCS  Baltimore Regional Office

The information with each application is categorized in accordance with FIPS 199 and NIST SP 800-60. As part of the categorization any PII is identified.

The VA has policies which direct and guide the activities and processes performed by the VA. The policies are periodically reviewed to ensure completeness and applicability.



The NIST SP 800-53 controls are selected based on the categorization. The controls provide protection for Veteran PII while developed or stored by an application or IT system, physically transported, between facilities, least privilege, stored offsite, or transmitted between IT centers.

Internal protection is managed by access controls such as user authentication (user IDs, passwords and Personal Identification Verification (PIV)), awareness and training, auditing, and internal network controls. Remote protection is provided by remote access control, authenticator management, audit, and encrypted transmission.

## **5.2 PRIVACY IMPACT ASSESSMENT: External sharing and disclosure**

*Discuss the privacy risks associated with the sharing of information outside the Department and what steps, if any, are currently being taken to mitigate those identified risks.*

*Discuss whether access controls have been implemented and whether audit logs are regularly reviewed to ensure appropriate sharing outside of the Department. For example, is there a Memorandum of Understanding (MOU), contract, or agreement in place with outside agencies or foreign governments.*

*Discuss how the sharing of information outside of the Department is compatible with the stated purpose and use of the original collection.*

*This question is related to privacy control AR-2, Privacy Impact and Risk Assessment, AR-3, Privacy Requirements for Contractors and Service Providers, and AR-4, Privacy Monitoring and Auditing*

Follow the format below:

**Privacy Risk:** The sharing of data is necessary for individuals to receive benefits at the **Area Baltimore**. However, there is a risk that the data could be shared with an inappropriate and/or unauthorized external organization or institution.

**Mitigation:** Safeguards implemented to ensure data is not shared inappropriately with organizations are employee security and privacy training and awareness and required reporting of suspicious activity. Use of secure passwords, access for need-to-know purposes, Personal Identification Verification (PIV) Cards, Personal Identification Numbers (PIN), encryption and access authorization are all measures that are utilized within the administrations. Standing letters for information exchange, business associate agreements and memorandums of understanding between agencies and VA are monitored closely by the Privacy Officer (PO), ISSO to ensure protection of information.

All personnel accessing Veteran's information must first have a successfully adjudicated background screening or Special Agreement Check (SAC). This background check is conducted by the Office of Personnel Management A background investigation is required commensurate with the individual's duties.

## **Section 6. Notice**

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

**6.1 Was notice provided to the individual before collection of the information? If yes, please provide a copy of the notice in Appendix A. (A notice may include a posted privacy policy, a Privacy Act notice on forms, or a system of records notice published in the Federal Register.) If notice was not provided, why not?**

*This question is directed at the notice provided before collection of the information. This refers to whether the person is aware that his or her information is going to be collected. A notice may include a posted privacy policy, a Privacy Act statement on forms, or a SORN published in the Federal Register. If notice was provided in the Federal Register, provide the citation.*

*If notice was not provided, explain why. If it was provided, attach a copy of the current notice.*

*Describe how the notice provided for the collection of information is adequate to inform those affected by the facilities within the Boundary that their information has been collected and is being used appropriately. Provide information on any notice provided on forms or on Web sites associated with the collection.*

*This question is related to privacy control TR-1, Privacy Notice, and TR-2, Boundary of Records Notices and Privacy Act Statements, and TR-3, Dissemination of Privacy Program Information.*

The **Area Baltimore** provides notice of information collection in several additional ways. The initial method of notification is in person during individual interviews or in writing via the Privacy Act statement on forms and applications completed by the individual. Additionally, the Department of Veterans Affairs also provides notice by publishing the following VA System of Record Notices (VA SORN) in the Federal Register and online.

**Applicable SORs**

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Applicable SORs</b>
VHA	<ul style="list-style-type: none"> <li>• Non-VA Fee Basis Records-VA, SOR 23VA10NB3</li> <li>• Patient Medical Records-VA, SOR 24VA10A7</li> <li>• Veteran, Patient, Employee, and Volunteer Research and Development Project Records- VA, SOR 34VA10</li> <li>• Community Placement Program-VA, SOR 65VA122</li> <li>• Health Care Provider Credentialing and Privileging Records-VA, SOR 77VA10E2E</li> <li>• Veterans Health Information Systems and Technology Architecture (VistA) Records-VA, SOR 79VA10</li> <li>• Income Verification Records-VA, SOR 89VA10NB</li> <li>• Automated Safety Incident Surveillance and Tracking System-VA, SOR 99VA131</li> <li>• The Revenue Program Billings and Collection Records-VA, SOR 114VA10</li> <li>• National Patient Databases-VA, SOR 121VA10A7</li> <li>• Enrollment and Eligibility Records- VA 147-VA10NF1VHA Corporate Data Warehouse- VA 172VA10A</li> <li>• Health Information Exchange - VA 168VA005</li> <li>• Applicants for Employment under Title 38, USC-VA, SORN 02VA135 (Prior to 1995)</li> <li>• Personnel Records – SORN 76VA05</li> </ul>

<i>Site Type: VBA/VHA/NCA or Program Office</i>	<i>Applicable SORs</i>
	<ul style="list-style-type: none"> <li>• Individuals Serving on a Fee Basis or Without Compensation (Consultants, Attending’s, and Others or Paid Indirectly through a Disbursement Agreement) Personnel Records-VA, SORN 14VA05</li> <li>• Telephone Service for Clinical Care Records- VA - SORN 113VA112</li> <li>• Patient Advocate Tracking System (PATS) – SORN 100VA10NS10</li> <li>• Police and Security Records – SORN 103VA07B</li> </ul>
VBA	<ul style="list-style-type: none"> <li>• Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA, SOR 58VA21/22/28</li> </ul>
NCA	<ul style="list-style-type: none"> <li>• Veterans and Dependents National Cemetery Gravesite Reservation Records -VA SOR 41VA41</li> <li>• Veterans and Dependents National Cemetery Interment Records-VA SOR 42VA41</li> <li>• Veterans (Deceased) Headstone or Marker Records-VA, SOR 48VA40B</li> <li>• VA National Cemetery Pre-Need Eligibility Determination Records -VA SOR 175VA41A</li> </ul>

This Privacy Impact Assessment (PIA) also serves as notice of the **Area Baltimore**. As required by the eGovernment Act of 2002, Pub.L. 107–347 §208(b)(1)(B)(iii), the Department of Veterans Affairs “after completion of the [PIA] under clause (ii), make the privacy impact assessment publicly available through the website of the agency, publication in the Federal Register, or other means.”

The VHA Notice of Privacy Practice (NOPP) is a document which explains the collection and use of protected health information to individuals interacting with VA. The NOPP is mailed every three years or when there is a major change to all enrolled Veterans.

The following written notice is on all VA forms: **PRIVACY ACT INFORMATION:** No allowance of compensation or pension may be granted unless this form is completed fully as required by law (38 U.S.C. 5101). The responses you submit are considered confidential (38 U.S.C. 5701). VA may disclose the information that you provide, including Social Security numbers, outside VA if the disclosure is authorized under the Privacy Act, including the routine uses identified in the VA system of records, 58VA21/22 Compensation, Pension, Education, and Rehabilitation Records - VA. The requested information is considered relevant and necessary to determine maximum benefits under the law. Information submitted is subject to verification through computer matching.

NCA: All NCA forms include Privacy Act statement  
 Employees and contractors are required to review, sign, and abide by the National Rules of Behavior on an annual basis.

**6.2 Do individuals have the opportunity and right to decline to provide information? If so, is a penalty or denial of service attached?**

*This question is directed at whether the person from or about whom information is collected can decline to provide the information and if so, whether a penalty or denial of service is attached.*

*This question is related to privacy control IP-1, Consent, IP-2, Individual Access, and IP-3, Redress*

The **Area Baltimore** only requests information necessary to administer benefits to veterans and other potential beneficiaries. While an individual may choose not to provide information, this may prevent them from obtaining the benefits necessary to them.

Employees and VA contractors are also required to provide the requested information to maintain employment or their contract with **Area Baltimore**.

NCA: Responding to collection is voluntary however, if information is not provided, then benefits may be denied.

**6.3 Do individuals have the right to consent to uses of the information? If so, how does the individual exercise the right?**

*This question is directed at whether an individual may provide consent for specific uses or the consent is given to cover all uses (current or potential) of his or her information. If specific consent is required, how would the individual consent to each use?*

*This question is related to privacy control IP-1, Consent*

**Information Consent Rights Table**

<b>Site Type: VBA VHA, NCA or Program Office</b>	<b>Information Consent Rights</b>
VHA	<p>Yes. Individuals have the right to consent to particular uses of information. They are directed to use VA Form 10-5345, Request for Authorization to Release Medical Records and describe in writing what information and/or to whom the information is restricted and must include their signature and date of the request. The request is then forwarded to facility Privacy Officer for review and processing</p> <p>Individuals may also request to Opt-Out of the facility directory during an inpatient admission. If the individual chooses to opt-out, no information on the individual is given out.</p> <p>Individuals can request further limitations on other disclosures. A veteran, legal guardian or court appointed Power of Attorney can submit a request to the facility Privacy Officer to obtain information.</p>
VBA	<p>Once information is provided to VBA, the records are used, as necessary, to ensure the administration of statutory benefits to all eligible Veterans, Service members, reservists, and their spouses, surviving spouses and dependents. As such, individuals are not provided with the direct opportunity to consent to uses of information. However, if an individual wishes to remove consent for a particular use of their information, they should contact the nearest VA regional office, a list of which can be found on the VBA website.</p>

<b>Site Type: VBA VHA, NCA or Program Office</b>	<b>Information Consent Rights</b>
NCA	Responding to collection is voluntary; therefore, consent of use is not applicable.

#### **6.4 PRIVACY IMPACT ASSESSMENT: Notice**

*Describe the potential risks associated with potentially insufficient notice and what steps, if any, are currently being taken to mitigate those identified risks.*

*Consider the following FIPPs below to assist in providing a response:*

*Principle of Transparency: Has sufficient notice been provided to the individual?*

*Principle of Use Limitation: Is the information used only for the purpose for which notice was provided either directly to the individual or through a public notice? What procedures are in place to ensure that information is used only for the purpose articulated in the notice?*

*This question is related to privacy control TR-1, Privacy Notice, AR-2, Privacy Impact and Risk Assessment, and UL-1, Internal Use*

Follow the format below:

**Privacy Risk:** There is a risk that veterans and other members of the public will not know that the **Area Baltimore** exists or that it collects, maintains, and/or disseminates PII, PHI or PII/PHI about them.

**Mitigation:** This risk is mitigated by the common practice of providing the Notice of Privacy Practice (NOPP) when Veterans are enrolled for health care. s. Employees and contractors are required to review, sign and abide by the National Rules of Behavior on a yearly basis as required by VA Handbook 6500 as well as complete annual mandatory Information Security and Privacy Awareness training. Additional mitigation is provided by making the System of Record Notices (SOR) and Privacy Impact Assessment (PIA) available for review online, as discussed in question 6.1 and the Overview section of this PIA.

## **Section 7. Access, Redress, and Correction**

The following questions are directed at an individual’s ability to ensure the accuracy of the information collected about him or her.

### **7.1 What are the procedures that allow individuals to gain access to their information?**

*Cite any procedures or regulations your program has in place that allow access to information. These procedures, at a minimum, should include the agency’s FOIA/Privacy Act practices, but may also include additional access provisions. For example, if your program has a customer satisfaction unit, that information, along with phone and email contact information, should be listed in this section in addition to the agency’s procedures. See 5 CFR 294 and the VA FOIA Web page to obtain information about FOIA points of contact and information about agency FOIA processes.*

*If the facilities within the Boundary are exempt from the access provisions of the Privacy Act, please explain the basis for the exemption or cite the source where this explanation may be found, for example, a Final Rule published in the Code of Federal Regulations (CFR).*

*If the facilities within the Boundary are not a Privacy Act Boundary, please explain what procedures and regulations are in place that covers an individual gaining access to his or her information.*

*This question is related to privacy control IP-2, Individual Access, and AR-8, Accounting of Disclosures.*

An individual wanting notification or access, including contesting the record, should mail or deliver a request to the office identified in the SOR. If an individual does not know the “office concerned,” the request may be addressed to the PO of any VA field station VHA facility where the person is receiving care or the Department of Veterans Affairs Central Office, 810 Vermont Avenue, NW, Washington, DC 20420. The receiving office must promptly forward the mail request received to the office of jurisdiction clearly identifying it as “Privacy Act Request” and notify the requester of the referral.

When requesting access to one’s own records, patients are asked to complete VA Form 10-5345a: *Individuals’ Request for a Copy of their Own Health Information*, which can be obtained from the medical center or online at <https://www.va.gov/find-forms/about-form-10-5345a/>.

Additionally, veterans and their dependents can gain access to their Electronic Health Record (EHR) by enrolling in the My HealthVet program, VA’s online personal health record. More information about My HealthVet is available at <https://www.myhealth.va.gov/index.html>.

As directed in VA SOR Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA, SOR 58VA21/22/28 (July 19, 2012), individuals seeking information regarding access to and contesting of VA records may write, call, or visit the nearest VA regional office. A list of regional VA offices may be found on the VBA Website.

## **7.2 What are the procedures for correcting inaccurate or erroneous information?**

*Describe the procedures and provide contact information for the appropriate person to whom such issues should be addressed. If the correction procedures are the same as those given in question 7.1, state as much.*

*This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.*

Individuals are required to provide a written request to amend or correct their records to the appropriate Privacy Officer or System Manager as outlined in the Privacy Act SOR. Every Privacy Act SOR contains information on Contesting Record Procedure which informs the individual who to contact for redress. Further information regarding access and correction procedures can be found in the notices listed in **Appendix A**.

The VHA Notice of Privacy Practices also informs individuals how to file an amendment request with VHA.

### **VHA:**

Individuals are provided the opportunity to submit a written request for change in the medical record via the amendment process. The procedure for correcting inaccurate or erroneous information begins with a Veteran requesting the records in question from Release of Information (ROI). The Veteran then crosses out the information they feel is inaccurate or erroneous from the records and writing in what the Veteran believes to be accurate. The request for amendment and correction is sent to the Chief of Health Information Management Service (HIMS) or their designee for processing.

The documents are then forwarded to the practitioner who entered the data by the Chief HIMS or their designee. The practitioner either grants or denies the request. Once the practitioner has reviewed the requested amendment the document goes to the practitioner's supervisor for review. The Veteran is notified of the decision via letter by the Chief HIMS. The goal is to complete any evaluation and determination within 30 days.

Employees should contact their immediate supervisor and Human Resources to correct inaccurate or erroneous information. Contractors should contact Contract Officer Representative to correct inaccurate or erroneous information upon request.

Individuals have the right to review and change their contact or demographic information at time of appointment or upon arrival to the VA facility and/or submit a change of address request form to the privacy officer for processing.

### **VBA:**

Individuals are provided the opportunity to submit a request for change in medical record via the amendment process. An amendment is the authorized alteration of health information by modification, correction, addition, or deletion. An individual can request an alteration to their health information by making a formal written request mailed or delivered to the VA health care facility that maintains the record. The request must be in writing and adequately describe the specific information the individual believes to be inaccurate, incomplete, irrelevant, or untimely and the reason for this belief.

A request for amendment of information contained in a system of records must be delivered to the System Manager, or designee, for the concerned VHA system of records, and the facility Privacy Officer (PO), or designee, to be date stamped; and is filed appropriately.

In reviewing requests to amend or correct records, the System Manager must be guided by the criteria set forth in VA regulation 38 CFR 1.579. That is, VA must maintain in its records only such information about an individual that is accurate, complete, timely, relevant, and necessary.

Individuals have the right to review and change their contact or demographic information at time of appointment or upon arrival to the VA facility and/or submit a change of address request form to the privacy officer for processing.

### **7.3 How are individuals notified of the procedures for correcting their information?**

*How are individuals made aware of the procedures for correcting his or her information? This may be through notice at collection or other similar means. This question is meant to address the risk that even if procedures exist to correct information, if an individual is not made fully aware of the existence of those procedures, then the benefits of the procedures are significantly weakened.*

*This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.*

Veterans are informed of the amendment process by many resources to include the VHA Notice of Privacy Practice (NOPP) which states:

### **Right to Request Amendment of Health Information.**

You have the right to request an amendment (correction) to your health information in our records if you believe it is incomplete, inaccurate, untimely, or unrelated to your care. You must submit your request in writing, specify the information that you want corrected, and provide a reason to support your request for amendment. All amendment requests should be submitted to the facility Privacy Officer at the VHA health care facility that maintains your information.

If your request for amendment is denied, you will be notified of this decision in writing and provided appeal rights. In response, you may do any of the following:

- File an appeal
- File a “Statement of Disagreement”
- Ask that your initial request for amendment accompany all future disclosures of the disputed health information

Individuals seeking information regarding access to and contesting of VA benefits records may write, call or visit the nearest VA regional office.

Additional notice is provided through the SORS listed in 6.1 of this PIA and through the Release of Information Office where care is received.

#### **7.4 If no formal redress is provided, what alternatives are available to the individual?**

*Redress is the process by which an individual gains access to his or her records and seeks corrections or amendments to those records. Redress may be provided through the Privacy Act and Freedom of Information Act (FOIA).*

*This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.*

*Example: Some projects allow users to directly access and correct/update their information online. This helps ensure data accuracy.*

Formal redress via the amendment process is available to all individuals, as stated in questions 7.1-7.3

In addition to the formal procedures discussed in question 7.2 to request changes to one’s health record, a veteran or other VAMC patient who is enrolled in MyHealthVet can use the system to make direct edits to their health records.

#### **7.5 PRIVACY IMPACT ASSESSMENT: Access, redress, and correction**

*Discuss what risks there currently are related to the Department’s access, redress, and correction policies and procedures for this Boundary and what, if any, steps have been taken to mitigate those risks. For example, if a project does not allow individual access, the risk of inaccurate data needs to be discussed in light of the purpose of the project. For example, providing access to ongoing law enforcement activities could negatively impact the program’s effectiveness because the individuals involved might change their behavior.*

*Consider the following FIPs below to assist in providing a response:*

*Principle of Individual Participation: Is the individual provided with the ability to find out whether a project maintains a record relating to him?*



*Principle of Individual Participation: If access and/or correction is denied, then is the individual provided notice as to why the denial was made and how to challenge such a denial?*

*Principle of Individual Participation: Is there a mechanism by which an individual is able to prevent information about him obtained for one purpose from being used for other purposes without his knowledge?*

*This question is related to privacy control IP-3, Redress.*

Follow the format below:

**Privacy Risk:** There is a risk that members of the public will not know the relevant procedures for gaining access to, correcting, or contesting their information.

**Mitigation:** Area Baltimore mitigates the risk of incorrect information in an individual's records by authenticating information when possible, using the resources discussed in question 1.5. Additionally, staff verifies information in medical records and corrects information identified as incorrect during each patient's medical appointments.

As discussed in question 7.3, the NOPP, which every enrolled Veteran receives every three years or when there is a major change. The NOPP discusses the process for requesting an amendment to one's records.

The Area Baltimore Release of Information (ROI) office is available to assist Veterans with obtaining access to their health records and other records containing personal information. The Veterans' Health Administration (VHA) established MyHealthVet program to provide Veterans remote access to their medical records. The Veteran must enroll and have access to the premium account to obtain access to all the available features. In addition, VHA Directive 1605.01 Privacy and Release of Information establishes procedures for Veterans to have their records amended where appropriate.

## **Section 8. Technical Access and Security**

The following questions are intended to describe technical safeguards and security measures.

### **8.1 What procedures are in place to determine which users may access the Boundary, and are they documented?**

*Describe the process by which an individual receives access to the Boundary.*

*Identify users from other agencies who may have access to the Boundary and under what roles these individuals have access to the Boundary. Who establishes the criteria for what PII can be shared?*

*Describe the different roles in general terms that have been created to provide access to the Boundary. For example, certain users may have "read-only" access while others may be permitted to make certain amendments or changes to the information.*

*This question is related to privacy control AR-7, Privacy-Enhanced Boundary Design and Development.*

Individuals receive access to the **Area Baltimore** by gainful employment in the VA or upon being awarded a contract that requires access to the boundary systems. Upon employment, the Office of Information & Technology (OI&T) creates computer and network access accounts as determined by employment positions assigned. Users are not assigned to software packages or network connections that are not part of their assigned duties or within their assigned work area. **VA Area**

**Baltimore** requires access to the GSS be requested using the local access request system. VA staff must request access for anyone requiring new or modified access to the GSS. Staff are not allowed to request additional or new access for themselves.

Access is requested utilizing Electronic Permission Access Boundary (ePAS). Users submit access requests based on need to know and job duties. Supervisor, ISSO and OI&T approval must be obtained prior to access granted. These requests are submitted for VA employees, contractors and all outside agency requests and are processed through the appropriate approval processes. Once access is granted, individuals can log into the system(s) through dual authentication, i.e., a PIV card with a complex password combination. Once inside the system, individuals are authorized to access information on a need-to-know basis.

Strict physical security control measures are enforced to ensure that disclosure to these individuals is also based on this same principle. Generally, VA file areas are locked after normal duty hours and the facilities are protected from outside access by the Federal Protective Service or other security personnel. Access to computer rooms at VA **Area Baltimore** is generally limited by appropriate locking devices and restricted to authorized VA IT employees. Access to information stored on automated storage media at other VA locations is controlled by individually unique passwords/codes. Access by Office of Inspector General (OIG) staff conducting an audit, investigation, or inspection at the health care area, or an OIG office location remote from the health care area, is controlled in the same manner.

Access to the **Area Baltimore** working and storage areas is restricted to VA employees who must complete both the HIPAA and Information Security training. Specified access is granted based on the employee's functional category. Role based training is required for individuals with significant information security responsibilities to include but not limited to Information System Security Officer (ISSO), local Area Manager, System Administrators, Network Administrators, Database Managers, Users of VA Information Systems or VA Sensitive Information.

Human Resources notify Divisions, IT and ISSO of new hires and their start date(s), either through email, fax etc. The Division that the person is going into fills out the Automated Systems Access Request form, with name, SSN and/or claim number, job title, division and telephone number. Area Baltimore is utilizing a chain of command system to create user network account. A representative from the user's chain of command must submit an electronic User Provisioning Request via the national service desk; the User Provisioning team will then create an employee's network account using account templates specific to business lines at each station. Additional application accesses are requested via Electronic Permission Access System (ePAS), Identity & Access Management (IAM), Common Security Employee Manager (CSEM) and other electronic access request methods.

- Individuals are subject to a background investigation before given access to Veteran's information.
- All personnel with access to Veteran's information are required to complete the VA Privacy and Information Security Awareness training and Rules of Behavior annually AND Privacy and HIPAA Focused Training.

Full time VARO employees, as their job requires it, have access to change Veteran Service Representative (VSR) and (RVSR) Rating Veteran Service Representatives have access to amend/change the information in the system, under the guidelines of least privilege, that is, users are granted the minimum accesses necessity to perform their duties. Work Study's' are limited to

Inquiry only commands. Veteran Service Organizations (Co-located VSOs) and County or Out based VSOs (CVSOs) also have access to VA systems. These accesses are predefined and limited for these users. Individuals are subject to a background investigation before given access to Veteran's information. Private Attorneys, Claim Agents and Veteran Service Organizations Representatives must be accredited through the Office of General Counsel.

**8.2 Will VA contractors have access to the Boundary and the PII? If yes, what involvement will contractors have with the design and maintenance of the Boundary? Has a contractor confidentiality agreement or a Non-Disclosure Agreement (NDA) been developed for contractors who work on the Boundary?**

*If so, how frequently are contracts reviewed and by whom? Describe the necessity of the access provided to contractors to the Boundary and whether clearance is required. If Privacy Roles and Responsibilities have been established to restrict certain users to different access levels, please describe the roles and associated access levels. Explain the need for VA contractors to have access to the PII.*

*This question is related to privacy control AR-3, Privacy Requirements for Contractors and Service Providers.*

Contractors will have access to the Boundary after completing the VA Privacy and Information Security Awareness training and Rules of Behavior annually, and after the initiation of a background investigation.

Contractors are only allowed access for the duration of the contract this is reviewed by the privacy officer and the designated Contracting Officer Representative (COR). Per the National Contractor Access Program (NCAP) guidelines, contractors can have access to the Boundary only after completing mandatory information security and privacy training, Privacy and HIPAA Focused Training as well as having completed a Special Agency Check, finger printing and having the appropriate background investigation scheduled with Office of Personnel Management.

Certification that this training has been completed by all contractors must be provided to the employee who is responsible for the contract in question. In addition, all contracts by which contractors might access sensitive patient information must include a Business Associate Agreement which clarifies the mandatory nature of the training and the potential penalties for violating patient privacy.

Contractors with VA Area Baltimore access must have an approved computer access request on file. The Area Manager, or designee, in conjunction with the ISSO and the applicable COR reviews accounts for compliance with account management requirements. User accounts are reviewed periodically in accordance with National schedules.

**8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or Boundary?**

*VA offers privacy and security training. Each program or Boundary may offer training specific to the program or Boundary that touches on information handling procedures and sensitivity of information. Please describe how individuals who have access to PII are trained to handle it appropriately.*

*This question is related to privacy control AR-5, Privacy Awareness and Training.*

All **Area Baltimore** personnel, volunteers, and contractors are required to complete initial and annual Privacy and Security Awareness and Rule Behavior (RoB) training, during New Employee Orientation (NEO) or via TMS. In addition, all employees who interact with patient sensitive medical information must complete the Privacy and HIPAA focused mandated privacy training. Finally, all new employees receive face-to-face training by the Boundary Privacy Officer and Information Security Officer during new employee orientation. The Privacy and Information Security Officers also perform subject specific trainings on an as needed basis.

Each site identifies personnel with significant information system security roles and responsibilities. (i.e., management, system managers, system administrators, contracting staff, HR staff), documents those roles and responsibilities, and provides appropriate additional information system security training. Security training records will be monitored and maintained.

The Talent Management System offers the following applicable privacy courses:

VA 10176: Privacy and Information Security Awareness and Rules of Behavior

VA 10203: Privacy and HIPPA Training

VA 3812493: Annual Government Ethics.

#### **8.4 Has Authorization and Accreditation (A&A) been completed for the Boundary?**

*8.4a If Yes, provide:*

1. The Security Plan Status: Approved
2. The Security Plan Status Date: March 8, 2022
3. The Authorization Status: Authorization to Operate (ATO)
4. The Authorization Date: May 20, 2022
5. The Authorization Termination Date: May 19, 2025
6. The Risk Review Completion Date: April 1, 2022
7. The FIPS 199 classification of the system (MODERATE).

*Please note that all Boundaries containing PII/PHI are categorized at a minimum level of “moderate” under Federal Information Processing Standards Publication 199.*

*8.4b If No or In Process, provide your **Initial Operating Capability (IOC) date.***

## Section 9. References

### Summary of Privacy Controls by Family

#### *Summary of Privacy Controls by Family*

<b>ID</b>	<b>Privacy Controls</b>
<b>AP</b>	<b>Authority and Purpose</b>
AP-1	Authority to Collect
AP-2	Purpose Specification
<b>AR</b>	<b>Accountability, Audit, and Risk Management</b>
AR-1	Governance and Privacy Program
AR-2	Privacy Impact and Risk Assessment
AR-3	Privacy Requirements for Contractors and Service Providers
AR-4	Privacy Monitoring and Auditing
AR-5	Privacy Awareness and Training
AR-7	Privacy-Enhanced Boundary Design and Development
AR-8	Accounting of Disclosures
<b>DI</b>	<b>Data Quality and Integrity</b>
DI-1	Data Quality
DI-2	Data Integrity and Data Integrity Board
<b>DM</b>	<b>Data Minimization and Retention</b>
DM-1	Minimization of Personally Identifiable Information
DM-2	Data Retention and Disposal
DM-3	Minimization of PII Used in Testing, Training, and Research
<b>IP</b>	<b>Individual Participation and Redress</b>
IP-1	Consent
IP-2	Individual Access
IP-3	Redress
IP-4	Complaint Management
<b>SE</b>	<b>Security</b>
SE-1	Inventory of Personally Identifiable Information
SE-2	Privacy Incident Response
<b>TR</b>	<b>Transparency</b>
TR-1	Privacy Notice
TR-2	Boundary of Records Notices and Privacy Act Statements
TR-3	Dissemination of Privacy Program Information
<b>UL</b>	<b>Use Limitation</b>

<b>ID</b>	<b>Privacy Controls</b>
UL-1	Internal Use
UL-2	Information Sharing with Third Parties

**Signature of Privacy Officers**

**The Privacy Officers below attest that the information provided in this Privacy Impact Assessment is true and accurate.**

**Privacy Officer, Yvonne J. Copeland**

**Privacy Officer, Joshua Carson**

**Privacy Officer, Charles Williamson**

**Privacy Officer, Cynthia Merritt**

**Signature of Information System Security Officers**

**The Information System Security Officers below attest that the information provided in this Privacy Impact Assessment is true and accurate.**

**Information System Security Officer, Albert E. Ngini**



**Signature of Area Manager**

**The Area Manager below attests that the information provided in this Privacy Impact Assessment is true and accurate.**

**Area Manager, Robert S. Kennedy**

## APPENDIX A – Notice

Please provide a link to the notice or verbiage referred to in **Section 6** (a notice may include a posted privacy policy; a Privacy Act notice on forms).

### *Applicable Notices*

<b>Site Type: VBA/VHA/NCA or Program Office</b>	<b>Applicable NOPPs</b>
VHA	<p><b>Notice of Privacy Practices</b></p> <p><b>VHA Privacy and Release of Information:</b></p>
VBA	<p><b>Privacy Statement on VA Forms:</b></p> <p>PRIVACY ACT INFORMATION: The VA will not disclose information collected on this form to any source other than what has been authorized under the Privacy Act of 1974 or Title 38, Code of Federal Regulations 1.576 for routine uses (i.e., civil or criminal law enforcement, congressional communications, epidemiological or research studies, the collection of money owed to the United States, litigation in which the United States is a party or has an interest, the administration of VA Programs and delivery of VA benefits, verification of identity and status, and personnel administration) as identified in the VA system of records, 58VA21/22/28, Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records - VA, published in the Federal Register. Your obligation to respond is required to obtain or retain benefits. VA uses your SSN to identify your claim file. Providing your SSN will help ensure that your records are properly associated with your claim file. Giving us your SSN account information is voluntary. Refusal to provide your SSN by itself will not result in the denial of benefits. The VA will not deny an individual benefits for refusing to provide his or her SSN unless the disclosure of the SSN is required by Federal Statute of law in effect prior to January 1, 1975, and still in effect. The requested information is considered relevant and necessary to determine maximum benefits under the law. The responses you submit are considered confidential (38 U.S.C. 5701). Information submitted is subject to verification through computer matching programs with other agencies</p> <p><b>SOR 58VA21/22/28</b></p>
NCA	<p><b>VA Form 40-0247</b>  <b>VA Form 40-1330</b>  <b>VA Form 40-1330M</b></p>

## APPENDIX B – PII Mapped to Components

**Note:** Due to the PIA being a public facing document, please do not include the server names in the table.

### *PII Mapping of Components (Servers/Database)*

<b><i>Components of the Area Boundary collecting/storing PII (Each row refers to a grouping of databases associated with a single server)</i></b>	<b><i>Does this component collect PII? (Yes/No)</i></b>	<b><i>Does this component store PII? (Yes/No)</i></b>	<b><i>Does this component share, receive, and/or transmit PII? (Yes/No)</i></b>	<b><i>Type of PII (SSN, DOB, etc.)</i></b>	<b><i>Reason for Collection/ Storage of PII</i></b>	<b><i>Safeguards</i></b>	<b><i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i></b>
UPS Server 1: <ul style="list-style-type: none"><li>• United Parcel Service</li></ul>	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Mailing Address, (Home, Temporary or Confidential) City, State and Zip Code	This data is needed to facilitate patient care and business operations	Full Disk Encryption	VAMHCS
UPS Server 2: <ul style="list-style-type: none"><li>• United Parcel Service</li></ul>	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Mailing Address, (Home, Temporary or Confidential) City, State and Zip Code	This data is needed to facilitate patient care and business operations	Full Disk Encryption	VAMHCS
<b>SQL001 Server 1: BAL</b> <ul style="list-style-type: none"><li>• PandoraVIA</li><li>• PandoraVIA_Security</li><li>• PandoraVIA2</li><li>• PandoraVIA2_Security</li></ul>	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), ID #, Location, Medication Name	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS

<b><i>Components of the Area Boundary collecting/storing PII (Each row refers to a grouping of databases associated with a single server)</i></b>	<b><i>Does this component collect PII? (Yes/No)</i></b>	<b><i>Does this component store PII? (Yes/No)</i></b>	<b><i>Does this component share, receive, and/or transmit PII? (Yes/No)</i></b>	<b><i>Type of PII (SSN, DOB, etc.)</i></b>	<b><i>Reason for Collection/ Storage of PII</i></b>	<b><i>Safeguards</i></b>	<b><i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i></b>
<b>SQL001 Server 1: BAL</b> • ACCESSCONTROL	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Unique numbers from PIV Card, Four-digit Pin when applicable	This data is needed to facilitate security access to restricted areas	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL001 Server 2: PER</b> • ACCESSCONTROL	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Unique numbers from PIV Card, Four-digit Pin when applicable	This data is needed to facilitate security access to restricted areas	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL016 Server 1: BAL</b> • BIOPOINT_PI6	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), SSN, DOB	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL016 Server 1: BAL</b> • OIG_REPORTING	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), DOB, SSN, Medical Records, Address (Home, Temporary or Confidential)	This data is needed to facilitate patient care and business operations.	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL016 Server 2: PER</b> • BIOPOINT_PI6	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), SSN, DOB	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS

<b>Components of the Area Boundary collecting/storing PII</b> <i>(Each row refers to a grouping of databases associated with a single server)</i>	<b>Does this component collect PII?</b> <i>(Yes/No)</i>	<b>Does this component store PII?</b> <i>(Yes/No)</i>	<b>Does this component share, receive, and/or transmit PII?</b> <i>(Yes/No)</i>	<b>Type of PII (SSN, DOB, etc.)</b>	<b>Reason for Collection/ Storage of PII</b>	<b>Safeguards</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
<b>SQL016 Server 2: PER</b> • BHL_PER_Prod	Yes	Yes	Yes	Patient Name ((First, Middle, Last, Suffix if applicable),DOB, SSN, Health Care Information	This data is needed to facilitate patient care and business operations.	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL019 Server 1: BAL</b> • BALMRSLIVE	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), SSN, DOB	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL019 Server 1: BAL</b> • Cochlear_Database	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable),DOB, Last Four SSN, Address (Home, Temporary or Confidential)	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL019 Server 1: BAL</b> • DssDb	Yes	Yes	Yes	Patient Name (First, Middle, Last, Suffix if applicable), SSN, Health Care Information	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL019 Server 1: BAL</b> • NOAHDatabaseCore	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), SSN, DOB, Gender	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL019 Server 1: BAL</b> • EMR • FaxQueue2k • WorkflowLog2k • DLM	Yes	Yes	Yes	Patient Name (First, Middle, Last, Suffix if applicable), DOB, SSN, Health Care Information	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS

<b>Components of the Area Boundary collecting/storing PII</b> <i>(Each row refers to a grouping of databases associated with a single server)</i>	<b>Does this component collect PII?</b> <i>(Yes/No)</i>	<b>Does this component store PII?</b> <i>(Yes/No)</i>	<b>Does this component share, receive, and/or transmit PII?</b> <i>(Yes/No)</i>	<b>Type of PII (SSN, DOB, etc.)</b>	<b>Reason for Collection/ Storage of PII</b>	<b>Safeguards</b>	<b>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</b>
<b>SQL1 Server 1: BAL</b> • IMED37	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), SSN, DOB	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL01 Server 1: PER</b> • CSP_Envox	Yes	Yes	Yes	Research Participants: Name (First, Middle, Last, Suffix if applicable), Address (Home, Temporary or Confidential), DOB, SSN, Gender	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL\PROD Server 1: BAL</b> • Geri_OLD2005	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Work Phone, Home Phone, Address, City, State, Zip, Relation, SSN, DOB, Gender, Results Date & Time	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL\PROD Server 1: BAL</b> • GeriEData • Registry	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Phone Numbers (Home, Work and Cellphone), Address (Home, Temporary or Confidential), City, State, Zip, SSN, DOB, Email (Personal or Work)	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS

<b><i>Components of the Area Boundary collecting/storing PII (Each row refers to a grouping of databases associated with a single server)</i></b>	<b><i>Does this component collect PII? (Yes/No)</i></b>	<b><i>Does this component store PII? (Yes/No)</i></b>	<b><i>Does this component share, receive, and/or transmit PII? (Yes/No)</i></b>	<b><i>Type of PII (SSN, DOB, etc.)</i></b>	<b><i>Reason for Collection/ Storage of PII</i></b>	<b><i>Safeguards</i></b>	<b><i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i></b>
<b>SQL\DEV</b> <b>Server 1: BAL</b> <ul style="list-style-type: none"> <li>• Geri_OLD2005</li> </ul>	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Phone Numbers (Home, Work and Cellphone), Address (Home, Temporary or Confidential), City, State, Zip, Relation, SSN, DOB, Gender, Results Date & Time	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS
<b>SQL\DEV</b> <b>Server 1: BAL</b> <ul style="list-style-type: none"> <li>• GeriEData</li> <li>• RegistryTest</li> <li>• GeriEDataTestVersion</li> </ul>	Yes	Yes	Yes	Name (First, Middle, Last, Suffix if applicable), Phone Numbers (Home, Work and Cellphone), Address (Home, Temporary or Confidential), City, State, Zip, SSN, DOB, Email (Personal or Work)	This data is needed to facilitate patient care	The databases are encrypted and the server is located in the data center	VAMHCS