



---

Date PIA submitted for review:

4/17/2023

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

# AREA PHOENIX PACIFIC DISTRICT AREA BOUNDARY

---

<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) Phoenix VA Health Care System         | 644                    |
| 2) Phoenix Regional Office               | 345                    |
| 3) National Memorial Cemetery of Arizona | 914                    |

**Boundary Contacts:**

**Boundary Key Stakeholders**

| <i>Name</i>                              | <i>Title (PO, ISSO, AM, MD/SPS Staff, Facility Director)</i> | <i>Phone Number</i> | <i>Email Address</i>     | <i>Applicable Site (VBA, VHA, NCA, Program Office)</i> |
|--|--|---------------------|--------------------------|--|
| <b>Designated PO:</b><br>Stacy Jonsgaard | Privacy Officer  | 602-277-5551x2740   | Stacy.Jonsgaard@va.gov   | VHA  |
| Robert White                             | Privacy Officer  | 602-627-3054        | Robert.White4@va.gov     | VBA  |
| Cynthia Merritt                          | Privacy Officer  | 321-200-7477        | cindy.merritt@va.gov     | NCACO  |
| Annaliza Monteiro                        | ISSO   | 602-277-5551 x7529  | Annaliza.Monteiro@va.gov | VHA  |
| Alison Duncan                            | ISSO   | 602-627-2823        | Alison.Duncan@va.gov     | VBA  |
| Anglea Hudachko                          | ISSO   | 602-277-5551 x7529  | Anglea.Hudachko@va.gov   | VHA  |
| Jim Crupi                                | Area Manager   | 602-277-5551 x5571  | James.Crupi@va.gov       | Area Phoenix   |

**Abstract**

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

Area Phoenix is an Information Boundary that consists of Carl T. Hayden VA Medical Center, Phoenix Regional Benefits Office, and the National Memorial Cemetery of Arizona. 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.

In order to be classified as a medical device, the device must meet one or more of the following: (1) are used in patient healthcare for diagnosis, monitoring, treatment or analytics, (2) have been subjected to FDA Premarket Notification- 510(k) certification - or Premarket Approval (PMA) Process, or (3) Is a hardware or software component of a medical device system that, if modified, can have a negative impact on the functionality/safety of the system.

Special Purpose Systems are non-medical, non-research VA network-connected, and non-Office of Information and Technology (OIT) supported Operational Technology (OT) device/system that cannot obtain a VA approved baseline.

## Overview

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

The *Area Phoenix* Medical System consists of medical devices, and applicable components, hosted within the facilities associated to the Boundary.

The system environment is comprised of patient healthcare system/devices for diagnosis, treatment, or monitoring of physiological measurements, or for health analytical purposes, has been subject to and completed the U.S. Food and Drug Administration's (FDA) Premarket Notification-- 510(k) certification—or Premarket Approval (PMA) Process. The system environment may also include, as applicable a component of a medical device system – hardware or software – and, if modified, can have a negative impact on the functionality/safety of the medical device system. All Medical Devices are identified in **Appendix C**.

The *Area Phoenix* Special Purpose System consists of specialized devices, and applicable components, hosted within the facilities associated to the Boundary. The system environment is comprised of operational technology devices/systems that assist, support, and maintain mission capabilities and operations for building safety, healthcare services, security services and other general services functional support areas.

The system environment may include, but are not limited to; energy management systems, heating ventilation and air conditioning (HVAC), temperature controls, building/facility access controls, building automation systems, utility control systems, distributed control systems, security cameras, emergency response vehicle dashcams, Virtual Reality (VR) headsets, promethean boards, TUG robots, Telesitter, and other business Operational Technologies. All Special Purpose Systems are identified in **Appendix C**.

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. PII/PHI.

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, 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 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 Phoenix* 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> <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> </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>   |

| <i>Site Type: VBA/VHA/NCA or Program Office</i> | <i>Applicable System of Records (SORs)</i>   |
|---|--|
| 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?

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

#### Additional Information Collected but Not Listed Above:

Service Information

Benefits Information

Funeral Information

Marital Status

Relationship to Veteran

Military service data, applicant's name and address, place of burial, burial service and headstone data.

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

Area Phoenix consists of three (3) servers and forty-one (41) databases 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 Phoenix 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?**

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.

Additional sources include:

- VA, Compensation, Pension, Education and Rehabilitation Records
- VA, Veterans and Beneficiaries Identification Records Location Subsystem
- VA Veterans and Armed Forces Personnel United States Government Life Insurance Records
- VA 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 Veterans Mortgage Life Insurance
- 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?

*Means of Collection Table*

| <i>Site Type: VBA/VHA/NCA or Program Office</i> | <i>Means of Collection</i>  |
|---|---|
| *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. |
| ^VBA  | 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.   |

| <b>Site Type: VBA/VHA/NCA or Program Office</b> | <b>Means of Collection</b>  |
|---|---|
|   | <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 Phoenix* using several methods. *These methods include site to site IPSEC tunnels, secure web portals, CPRS, paper forms, e-mail, fax, telephone disclosures, and HL7 interfaces.* 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).



These data collections may be done using secure web portals, VPN connection, e-mail, and facsimile.

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?**

The purposes of the information from Veterans and other members of the public collected, maintained, and processed by *Area Phoenix* 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> <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> </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> <li>• 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.</li> </ul>  |

| <i>Site Type: VBA/VHA/NCA or Program Office</i> | <i>Purpose of Information Collection</i>   |
|---|--|
| 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?**

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.

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?**

*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>• 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)</li> <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> </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>   |

| <b>Site Type: VBA/VHA/NCA 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)</li> <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> </ul>   |
| NCA   | <ul style="list-style-type: none"> <li>• National Cemetery, Title 38, United States Code (U.S.C.) Chapter 38 § 101, 38 CFR Subpart B , 38 CFR 3.1700-CFR 3.1713. 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 2400-2404.</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>• 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**

### **Privacy Risk:**

VA Area Phoenix collects Personally Identifiable Information (PII) and a variety of other Sensitive Personal Information (SPI), such as Protected Health Information (PHI). 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 Phoenix 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 boundary 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.**

- **Name:** 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:** Used for communication, billing purposes and calculate travel pay
- **Zip Code:** Used for communication, billing purposes, and to calculate travel pay
- **Phone Number(s):** 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 MyHealthVet 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.
- **Tax Identification Number:** Used for employment, eligibility verification
- **Medical Record Number:** Used to identify a patient within the medical record system without using their social security number as their identifier.
- **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.
- **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.
- **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:** Used as patient demographic, identity and indicator for type of medical care/provider and medical tests required for individual.
- **Tumor PII/PHI Statistics:** Used to evaluate medical conditions and determine treatment plan
- **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

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?

The VA Area Phoenix uses statistics and analysis to create general reports that provide the VA a better understanding of patient care, benefits, etc. 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?**

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.

## **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?**

The Area Phoenix itself, does not retain information.



- Name
- Previous medical records
- Social Security Number (SSN)
- Race/ethnicity
- Date of Birth
- Next of Kin
- Mother's Maiden Name
- Guardian Information
- Mailing Address
- ePHI
- Zip Code
- Military history/service connection
- Phone Numbers
- Service connection disabilities
- Fax Numbers
- Employment information
- Email address
- Veteran dependent information
- Emergency contact info
- Disclosure requestor information
- Financial account information
- Death certification information
- Health insurance beneficiary account numbers
- Tumor PII/PHI statistics
- Certificate/license numbers
- Criminal background investigation
- Internet Protocol address numbers
- Education Information
- Current medications
- Gender
- Tax Identification Number
- Medical Record Number
- Vehicle License Plate Numbers
- 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 service and headstone data.

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

*Length of Retention Table*

| <i>Site Type: VBA/VHA/NCA or Program Office</i> | <i>Length of Retention</i>   |
|---|--|
| *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> <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</li> </ul> |

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

*Retention Schedule Table*

| <i>Site Type: VBA/VHA/NCA or Program Office</i> | <i>Retention Schedule</i>   |
|---|---|
| *VHA  | <a href="#">Records Control Schedule 10-1</a><br><a href="#">Records Control Schedule 005-1</a>   |
| ^VBA  | <a href="#">Veterans Benefits-1</a>   |
| NCA   | Veterans (Deceased) Headstone or Marker Records-VA SORN 48VA40B: Retained indefinitely<br>NCA RCS |
|   |   |

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

Information within the *Area Phoenix* is destroyed by the disposition guidance of [RCS 10-1, VB-1, etc.]. Paper documents are destroyed to an unreadable state in accordance with the Department of Veterans' Affairs VA Directive 6371, (April 8, 2014)

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.

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.

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*

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

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

**Privacy Risk:** There is a risk that the information maintained by *Area Phoenix* 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 Phoenix* 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 Phoenix* 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.

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.**

*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 PII/PHI data elements that are processed (shared/received/transmitted) 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> |
|---|--|--|---|---|
| VA Office of Inspector General  | OIG  | Name, Social Security Number, Date of Birth, Mailing Address, Zip Code, Phone Numbers, Health Information                            | Hard Copy, Secure e- mail   | Phoenix VAMC, Phoenix Regional Office                                   |
| Veteran Benefits Administration   | VBMS   | Social Security Number, Benefits Information, Claims Decision, DD-214  | Compensation and Pension Record Interchange (CAPRI) electronic software package | Phoenix Regional Office   |
| Veterans' Health Administration   | VistA  | System Log files, sample clinical data   | Electronically pulled from  | Phoenix VAMC  |

|  |                |  |  |              |
|--|----------------|--|--|--------------|
|  |                | that may contain Protected Health Information (PHI)  | VistA thru Computerized Patient Record System (CPRS)                     |              |
| VA Tumor Register                            | Tumor Register | Diagnosis & procedures, tumor status, treatment outcome, survivor tracking, type of treatments, demographics, hormone, radiation, chemotherapy, problem lists  | Electronic tumor registry package  | Phoenix VAMC |
| VA HIV Register                              | HIV Register   | Diagnosis & procedures, HIV/AIDS status, treatment outcome, survivor tracking, types of treatments, demographics, problem lists.   | register/register package  | Phoenix VAMC |
| VA Health Eligibility Center                 | HEC            | Name of veteran, SS#, DOB, Service Dates, Character of service   | Scanned documents uploaded into shared software program                  | Phoenix VAMC |
| Consolidated mail Outpatient Pharmacy (CMOP) | CMOP           | Patient SSN, Patient Name, Patient Address (mailing address and home address), Patient Phone, Number, Patient Account Number, Prescribing Doctor, Medication Prescribed, Prescription Directions, Last time, Medication was refilled, When the prescription expires. | Electronically reviewed thru Computerized Patient Record System (CPRS)   | Phoenix VAMC |
| Consolidated Patient Account Center (CPAC)   | CPAC           | Diagnosis, service connection, dates of service, health insurance information, demographics  | Electronically pulled from VISTA thru CPRS; Huron system extract through | Phoenix VAMC |

|   |   |  |  |  |
|---|---|--|--|--|
|   |   |  | encrypted emails, mail of encrypted CDs secure web portal                                  |  |
| VA Office of Research & Development (ORD)                 | ORD   | Name of veteran, SS#, DOB, medical records, research study data  | Electronically reviewed thru Computerized Patient Record System (CPRS)                     | Phoenix VAMC   |
| Austin Acquisition Center (AAC)                           | AAC   | Patient medical and financial information to include Name of veteran, SS#, DOB   | Electronically reviewed thru Computerized Patient Record Data Services (DAS) System (CPRS) | Phoenix VAMC   |
| Data Services (DAS)                                       | DAS   | Demographics procedures treatments and outcome   | SOAP over HTTPS using SSL encryption and Certificate exchange                              | Phoenix VAMC   |
| VA Network Authorization Office for NON- VA Care Payments | NAO   | Demographics, diagnoses, medical history, service connection, provider orders, VHA recommendation/approval for non-VA care   | Electronically reviewed through Computerized Patient Record System (CPRS)                  | Phoenix VAMC   |
| VA Phoenix Veteran Centers                                | VA  | Read only access to health information for plan of treatment; Demographics, diagnoses, medical history, service connection, provider orders, VHA recommendation/approval for non-VA care | Electronically reviewed through Computerized Patient Record System (CPRS)                  | Phoenix VAMC   |
| VA National Cemetery Administration                       | Memorial Benefits Management System (MBMS); BOSS (Burial Operations Support System); AMAS | Benefits, decedent, claimant, requestor, and beneficiary information (such as names, addresses, social security numbers)   | Information may be transmitted upon request in a written or verbal format based on the     | National Memorial Cemetery of Arizona (NMCA) and National cemeteries and other NCA offices, as needed for processing |

|   |  |  |  |  |
|---|--|--|--|--|
|   | (Automated Monument Application System);<br>MADSS (Management and Decision Support System);<br>EOAS (Eligibility Office Automation System);<br>PMCS (Presidential Memorial Certificate System);<br>Veterans Benefit Management System (VBMS);<br>Master Person Index (MPI) |  | individual request;<br>Electronically shared via network connections                         |  |
| VA Master Persons Index (MPI)-<br>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)  | NCA- National cemeteries and other NCA offices, as needed for processing |
| Burial Operations Support System -<br>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, | Secure Database Connection - Oracle Forms based application backed by an Oracle 12c database | NCA- National cemeteries and other NCA offices, as needed for processing |



|                                      |                     |  |                             |  |
|--------------------------------------|---------------------|--|-----------------------------|--|
|                                      |                     | Veteran’s Period of Service, and Veteran’s War Period  |                             |  |
| 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) | NCA- National cemeteries and other NCA offices, as needed for processing |

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

Follow the format below:

**Privacy Risk:** The internal sharing of data is necessary individuals to receive benefits at the *Area Phoenix*. 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.**

Data Shared with External Organizations

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System  | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)                         | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|--|---|--|--|
| State Prescription Drug Monitoring Program                                    | State Prescription Drug Monitoring Program   | Name, date of birth, Address, RX number, Date of RX, Medication, Qty, Date of Supply, Provider, # of refills, where it was filled, Insurance if used           | Standing Letter SORN 02VA135  | Via secure fax and verbal disclosures via telephone                      | Phoenix VAMC   |
| Department of Child Services  | Department of Child Services   | Name, date of birth, SSN, demographics regarding veterans or family when suspicion of child abuse or neglect Pertinent Personally Identifiable                 | Arizona Revised Statutes Section 13-3620.A.   | via secure fax and verbal disclosures via telephone                      | Phoenix VAMC   |
| Department of Elder Services  | Department of Elder Services   | Name, date of birth, SSN, demographics regarding veterans or family when suspicion of elder abuse or neglect Pertinent Personally Identifiable Information PII | Arizona Revised Statutes ARS 46-451 and 46-454 A. through E. and G. and Title 38, United States Code, Section 5701; VHA Standing Request Letter | via secure fax and verbal disclosures via telephone                      | Phoenix VAMC   |
| Social Security Administration  | Social Security Administration   | Protected Health Information such as name, SSN,  | Title 38, United States Code, Section   | via secure web portal  | Phoenix Regional Office,   |

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System  | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one) | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|--|---|--|--|
|   |  | DOB, medical information. Patient Treatment  | 5701; SORN79VA19  |  | Phoenix VAMC   |
| Social Security Disability  | Social Security Disability   | Social Security Number, Protected Health Information (PHI, PII)  | Title 38, United States   | via secure web portal  | Phoenix Regional Office, Phoenix VAMC                            |
| Department of Motor Vehicles  | Department of Motor Vehicles   | Name, Date of Birth, SSN, demographics regarding veterans when danger to self or public is likely. Reports are only made by VA Police. Pertinent Personally Identifiable Information PII | VHA Directive 1605.01, Release of Information; Title 38, United States Code, Section 5701                               | via secure web portal  | Phoenix VAMC   |
| IRS - Internal Revenue Services   | IRS - Internal Revenue Services  | Name, Financial Information  | SORN 147VA16  | Secure Web-Portal, Secure Socket Layer                                   | Phoenix Regional Office, Phoenix VAMC                            |
| Department of Defense (DoD)   | Department of Defense (DoD)  | Protected Health Information such as name, SSN, DOB, medical information. Patient Treatment  | VHA Directive 1605.01, Release of Information; Title 38, United States Code, Section 5701.                              | Electronic via EDI interface/paper via US Postal Service; Secured Fax    | Phoenix Regional Office, Phoenix VAMC                            |
| Veteran Service Organizations   | Veteran Service  | Name, DOB, SSN, health information   | SORN 58VA21/22/28   | Secure web portal  | Phoenix Regional   |

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System                                   | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one) | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|---|---|--|--|
|   | Organizations  |   | (July 19, 2012)   |  | Office, Phoenix VAMC   |
| Accredited Claims Representative and Private Attorneys                        | Accredited Claims Representative and Private Attorneys   | Name, DOB, SSN, health information  | SORN 58VA21/22/28 (July 19, 2012)   | Secure web portal  | Phoenix Regional Office, Phoenix VAMC                            |
| Medicom   | Medicom  | first name, last name, date of birth, the facilities where they have been previously imaged, date of studies, and modality that contains PHI. | ISA/MOU   | bidirectionally via port 443 Site-to- Site VPN tunnel                    | Phoenix VAMC   |
| Arizona Health Authority  | Arizona Health Authority   | Full Name, Address, Diagnosis, Testing information.   | Title 38, USC section 8701; VHA standing letter agreement; SORN 79VA19, Title 38, USC 5701                              | Secure web portal  | Phoenix VAMC   |
| OPM Fingerprint Transaction System (OPMFTS)                                   | OPM Fingerprint Transaction System (OPMFTS)  | Protected Health Information such as name, SSN, DOB, medical information. Patient Treatment   | National MOU  | S2S VPN  | Phoenix Regional Office, Phoenix VAMC                            |
| Federal Bureau of Investigation (FBI)   | Federal Bureau of Investigation (FBI)  | Protected Health Information such as name, SSN, DOB, medical information.   | VA SORN 79VA19  | Electronic via FBI Website   | Phoenix Regional Office, Phoenix VAMC                            |

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System                       | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one) | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|---|---|--|--|
|   |  | Patient Treatment   |   |  |  |
| Omnicell  | Omnicell   | system temperature, disk space, CPU utilization, and communication errors of connected medical cabinets                           | National ISA/ MOU   | VPN IPSEC Tunnel   | Phoenix VAMC   |
| GE Med-IT   | GE Med-IT  | patient name, DOB, record ID, images, waveforms, and gender   | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| Scriptpro   | Scriptpro  | PII, PHI, and III appropriate to the agreement. (including veteran full name, date of birth, full SSN, diagnosis and medications) | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| Siemens   | Siemens  | laboratory patient results, patient name, test results, medical record number full and accession number.                          | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| AGFA  | AGFA   | Name, Social Security Number, DOB, Health Care Information  | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| Quest Diagnostic  | Quest Diagnostic   | Protected Health Information such as name, SSN, DOB, medical information.   | National ISA/ MOU   | HL7 Interface w/Data Innovations Server in Location                      | Phoenix VAMC   |

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System  | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one) | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|--|---|--|--|
| Sorna   | Sorna  | Patient Treatment<br>Software, software updates, software code trace files, machine language trace files, network package captures, and DICOM protocol language to assist in the analysis of troubleshooting issues. Patient information may be included in the DICOM communication. Incidental PHI stored in log files – patient names and SSN. | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| Philips Healthtech  | Philips Healthtech   | System performance parameters/system monitoring (disk space, usage, image quality), system error code information, Acquisition parameters, system maintenance, patient images.   | National ISA/ MOU   | S2S VPN  | Phoenix VAMC   |
| BOSS and Veterans Benefits  | Benefits, decedent, claimant,  | Names, addresses, service information,   | MOU in Draft  | Electronic access within the   | State and Tribal   |

| List External Program Office or IT System information is shared/received with | List the purpose of information being shared / received / transmitted with the specified program office or IT System   | List the specific data element types such as PII/PHI that are shared/received with the Program or IT System | List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)  | List the method of transmission and the measures in place to secure data | Applicable Sites within Boundary (VBA, VHA, NCA, Program Office) |
|---|--|---|--|--|--|
| Management Service (VBMS) – State and Tribal Cemeteries                       | requestor, and beneficiary information.  | marriage /dependent status, and social security numbers)  |  | system   | cemeteries located within the area                               |
| 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 | Names, addresses, service information, marriage /dependent status, and social security numbers              | 48VA40B – Veterans (Deceased) Headstone or Marker Record s-VA, per Title 38, United States Code: Sections 501(a), 501(b), and Chapter 24, Sections 2400-2404. ISA/MOU between Salesforce and MBMS system | Service Based  | NCA- State and Tribal cemeteries located within the area         |
| 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.                 | Names, addresses, service information, marriage /dependent status, and social security numbers              | MBMS is a minor application under the BIP Platform ATO – all VAEC AWS agreements are between BIP and VAEC  | Hosted Environment   | NCA- State and Tribal cemeteries located within the area         |

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**

**Privacy Risk:** The sharing of data is necessary for individuals to receive benefits at the *Area Phoenix*. 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?**

The *Area Phoenix* 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&amp;</li> <li>• Health Information Exchange - VA 168VA005</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 Phoenix. 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. 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?**

The *Area Phoenix* 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 Phoenix*.

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

*Information Consent Rights Table*

| <i>Site Type: VBA<br/>VHA, NCA or<br/>Program Office</i> | <i>Information Consent Rights</i>   |
|--|---|
| *VHA   | Yes. Individuals must submit in writing to their facility PO. The request must state what information and/or to whom the information is restricted and must include their signature and date of the request. The request is |

|  |  |
|--|--|
| <b>Site Type: VBA<br/>VHA, NCA or<br/>Program Office</b> | <b>Information Consent Rights</b>  |
|  | <p>then forwarded to facility Privacy Officer for review and processing. 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 <a href="#">VBA website</a>.</p> |
| NCA  | <p>Responding to collection is voluntary; therefore, consent of use is not applicable.</p>   |
|  |  |

#### 6.4 PRIVACY IMPACT ASSESSMENT: Notice

**Privacy Risk:** There is a risk that veterans and other members of the public will not know that the Area Phoenix 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?

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?

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.

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

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?**

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**

**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 Phoenix* 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 Phoenix* 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?

Individuals receive access to the *Area Phoenix* 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 Phoenix* 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 Phoenix 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 Phoenix* 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 of new hire start date(s). The division begins the account access process through utilization of the Service Now ticketing system and Automated Information System. The Division that the person is going into fills out the Automated Information System access form, with name, SSN and/or claim number, job title, division and telephone number, along with marking the boxes on the form for application access the user will need on the computer system. This form starts at the Division level, is signed by the Division Chief, then goes to the Director, for signatures and then to IT for implementation.

- 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?**

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 Phoenix* access must have an approved computer access request on file. The area manager, or designee, in conjunction with 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?**

All *Area Phoenix* 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 Systems Security Plan Status: Approved*
- 2. The Systems Security Plan status Date: 25 Jan 2021*
- 3. The Authorization Status: Authority To Operate*
- 4. The Authorization Date: 25 Jan 2021*
- 5. The Authorization Termination Date: 16 Sep 2024*
- 6. The Risk Review Completion Date: 10 Aug 2021*
- 7. The FIPS 199 classification of the system (LOW/MODERATE/HIGH): 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>                                       |
| 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, Stacy Jonsgaard**

---

**Privacy Officer, Robert White**

---

**Privacy Officer, Cindy 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, Annaliza Monteiro**

---

**Information System Security Officer, Alison Duncan**

---

**Information System Security Officer, Angela Hudachko**

**Signature of Area Manager**

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

---

**Area Manager, Jim Crupi**

## 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:<br/>VBA/VHA/NCA or<br/>Program Office</b> | <b>Applicable NOPPs</b>   |
|---|---|
| VHA   | <p><b><u>Notice of Privacy Practices</u></b></p> <p><b><u>VHA Privacy and Release of Information:</u></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><u>SOR 58VA21/22/28</u></b></p> |
| /NCA  | <p><b><u>VA Form 40-0247</u></b></p> <p><b><u>VA Form 40-1330</u></b></p> <p><b><u>VA Form 40-1330M</u></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 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>Server 1:</b><br>BIORAD_PHOVAHCS<br>Censis_Beta_V2_Global<br>Censis_graphics<br>Censis_HL1277<br>Censis_SG1277<br>CensisBufferAgent<br>DsPcDb<br>DSSdb<br>DSSdbTest<br>EncoreDB<br>EncoreWarehouse<br>iWEMC<br>LCDS<br>NHI-LightHouse-Incidents<br>NHI-LightHouse-Logs<br>NHI-LightHouse-Main | Yes   | Yes   | Yes   | Name, Social Security Number, DOB, Health Care Information | To provide and manage health care for veteran patients. | Advanced Encryption Standard (AES) 256, Server is stored in a secured environment and managed with restricted access controls. | Phoenix VAMC   |
| <b>Server 2:</b><br>Maestro9.0<br>NOAHDatabaseCore<br>PHX365N  | Yes   | Yes   | Yes   | Name, Social Security Number, DOB, Health                  | To provide and manage health care for veteran patients. | Advanced Encryption Standard (AES) 256, Server is  | Phoenix VAMC   |

| <i>Components of the Boundary collecting/storing PII (Each row refers to a grouping of databases associated with a single server)</i>  | <i>Does this component collect PII? (Yes/No)</i> | <i>Does this component store PII? (Yes/No)</i> | <i>Does this component share, receive, and/or transmit PII? (Yes/No)</i> | <i>Type of PII (SSN, DOB, etc.)</i>                        | <i>Reason for Collection/ Storage of PII</i>            | <i>Safeguards</i>  | <i>Applicable Sites within Boundary (VBA, VHA, NCA, Program Office)</i> |
|--|--|--|--|--|---|--|---|
| PHX365Test   |  |  |  | Care Information   |   | stored in a secured environment and managed with restricted access controls.   |   |
| <b>Server 3:</b><br>ACVSAudit<br>ACVSBIRS<br>ACVSCore<br>ACVSJournal<br>ACVSUJournal_00010002<br>ACVSUJournal_00010003<br>ACVSUJournal_00010004<br>ACVSUJournal_00010005<br>ACVSUJournal_00010006<br>ACVSUJournal_00010007<br>ACVSUJournal_00010008<br>ACVSUJournal_00010009<br>Censis_Beta_V2_Global<br>Censis_graphics<br>Censis_HL1277<br>Censis_SG1277<br>CensisBufferAgent<br>EMR<br>NMDB000079<br>SWHSystemAudit<br>SWHSystemJournal | Yes  | Yes  | Yes  | Name, Social Security Number, DOB, Health Care Information | To provide and manage health care for veteran patients. | Advanced Encryption Standard (AES) 256, Server is stored in a secured environment and managed with restricted access controls. | Phoenix VAMC  |

