

Privacy Impact Assessment - 2009 (Form) / Benefits Delivery Network (BDN) Maintenance and Operations-2009 (Item)

PIA SECTIONS 1 - 4

Part I. Project Identification and Determination of PIA Requirement

1. PROJECT IDENTIFICATION:

1.1) Project Basic Information:

1.1.a) Project or Application Name:

Benefits Delivery Network (BDN) Maintenance and Operations-2009

1.1.b) OMB Unique Project Identifier:

029-00-01-13-01-1360-00

1.1.c) Project Description

Project description is pre-populated from Exhibit 300 Part I.A.8. You will not be able to edit the description on this form.

The VBA Benefits Delivery Network (BDN) Payment System contributes to meeting the following VA strategic goals; Restore the capability of disabled veterans to the greatest extent possible and improve the quality of their lives and their families; Ensure a smooth transition for veterans from active military services to civilian life; and Honor and serve veterans in life and memorialize them in death for their sacrifices on behalf of the Nation. The BDN is the legacy system employed by VBA to process entitlements for three of the five business lines: Compensation and Pension, Education, and Vocational Rehabilitation and Employment. The primary services of the BDN are: receipt, processing, tracking and disposition of veterans' applications for benefits; requests for assistance and general administration of legislated benefit programs. The BDN processes at the Hines Information Technology Center (ITC). The Compensation program provides monthly payments and ancillary benefits to veterans in recognition of the loss of earning capacity caused by a disability or disease incurred in or aggravated during military service. The Pension program provides monthly payments to needy wartime veterans who are permanently and totally disabled as a result of a disability not related to military service. The Educational Assistance provides opportunities for higher education; restore lost educational opportunities and vocational readjustment. The Vocational Rehabilitation and Employment program helps service-disabled veterans achieve independent life skills and employment, provide service to enable veterans with service-connected disabilities to achieve independence in daily living, become employable and obtain and maintain suitable employment. The BDN provides interface to VBA's other benefits delivery systems, as such, the VBA OIM Hines ITC maintains and administers all VBA databases for compensation, pension, education, and vocational rehabilitation and employment claims processing, supports the external interfaces (such as SSA and IRS) and provides payment data to the U.S. Treasury, which issues benefit payments. The system has been fully installed and tested to support failover operations in the event of any unplanned events or disasters at the Hines ITC. The second phase of BDN Disaster Recovery will be the data vaulting of the daily online BDN transactions to storage devices that shall be acquired for the Philadelphia BDN Disaster Recovery system.

1.1.d) Additional Project Information (Optional)

The project description provided above should be a concise, stand-alone description of the project. Use this section to provide any important, supporting details.

The VBA and the Austin Automation Center have released the statement of work for contractor proposals for the acquisition of hardware, software and contractor support services to begin the implementation of the electronic vaulting of veterans records payment data to the BDN disaster recovery platform at the Philadelphia ITC. The target date is for contract award September 2006 and project completion and acceptance by May 2007.

1.2) Contact Information:

1.2.a) Person completing this document:	
Title:	Stephen Mercier
Organization:	VBA IT Operations Staff (20SB)
Telephone Number:	202-273-6901
Email Address:	steve.mercier@va.gov

1.2.b) Project Manager:	
Title:	Stephen Mercier
Organization:	VBA IT Operations Staff (20SB)
Telephone Number:	202-273-6901
Email Address:	steve.mercier@va.gov
1.2.c) Staff Contact Person:	
Title:	Brian Stephens
Organization:	VBA Compensation & Pension Service
Telephone Number:	727-319-5807
Email Address:	brian.stephens@va.gov

ADDITIONAL INFORMATION: If appropriate, provide explanation for limited answers, such as the development stage of project.

2. DETERMINATION OF PIA REQUIREMENTS:

A privacy impact assessment (PIA) is required for all VA projects with IT systems that collect, maintain, and/or disseminate personally identifiable information (PII) of the public, not including information of Federal employees and others performing work for VA (such as contractors, interns, volunteers, etc.), unless it is a PIV project. All PIV projects collecting any PII must complete a PIA. PII is any representation of information that permits the identity of an individual to be reasonably inferred by either direct or indirect means. Direct references include: name, address, social security number, telephone number, email address, financial information, or other identifying number or code. Indirect references are any information by which an agency intends to identify specific individuals in conjunction with other data elements. Examples of indirect references include a combination of gender, race, birth date, geographic indicator and other descriptors.

2.a) Will the project collect and/or maintain personally identifiable information of the public in IT systems?

Yes

2.b) Is this a PIV project collecting PII, including from Federal employees, contractors, and others performing work for VA?

No

If "YES" to either question then a PIA is required for this project. Complete the remaining questions on this form. If "NO" to both questions then no PIA is required for this project. Skip to section 14 and affirm.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

Part II. Privacy Impact Assessment

3. PROJECT DESCRIPTION:

Enter the information requested to describe the project.

3.a) Provide a concise description of why personal information is maintained for this project, such as determining eligibility for benefits or providing patient care.

The Benefits Delivery Network (BDN) is the legacy system employed by VBA to process entitlements for three VA mission areas: Compensation and Pension, Education, and Vocational Rehabilitation and Employment. The primary services of the

BDN entail the receipt, processing, tracking and disposition of veterans' applications 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.
3.b) What specific legal authorities authorize this project, and the associated collection, use, and/or retention of personal information?
Title 38, United States Code, Chapter 3, Section 210(c)(1) authorizes the Department of Veterans Affairs, Veterans Benefits Administration for operations and maintenance for this nationwide veterans benefits payment system.
3.c) Identify, by selecting the appropriate range from the list below, the approximate number of individuals that (will) have their personal information stored in project systems.
10,000,000 - 19,999,999
3.d) Identify what stage the project/system is in: (1) Design/Planning, (2) Development/Implementation, (3) Operation/Maintenance, (4) Disposal, or (5) Mixed Stages.
(3) Operation/Maintenance
3.e) Identify either the approximate date (MM/YYYY) the project/system will be operational (if in the design or development stage), or the approximate number of years that the project/system has been in operation.
The BDN is steady state and the core system became been operational nationwide in 1978. The BDN has been payment system for nations veterans for approximately 29 years.
ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

4. SYSTEM OF RECORDS:
<i>The Privacy Act of 1974 (Section 552a of Title 5 of the United States Code) and VA policy provide privacy protections for employee or customer information that VA or its suppliers maintain in a System of Records (SOR). A SOR is a file or application from which personal information is retrieved by an identifier (e.g. name, unique number or symbol). Data maintained in a SOR must be managed in accordance with the requirements of the Privacy Act and the specific provisions of the applicable SOR Notice. Each SOR Notice is to be published in the Federal Register. See VA Handbook 6300.5 "Procedures for Establishing & Managing Privacy Act Systems Of Records", for additional information regarding Systems of Records.</i>
4.a) Will the project or application retrieve personal information on the basis of name, unique number, symbol, or other identifier assigned to the individual?
If "No" then skip to section 5, 'Data Collection'.
Yes
4.b) Are the project and/or system data maintained under one or more approved System(s) of Records?
IF "No" then SKIP to question 4.c.
Yes
4.b.1) For each applicable System of Records, list:
(1) The System of Records identifier (number),
58VA21 58VA22 58VA28
(2) The name of the System of Records, and
OMB Identifier: 029-00-01-13-01-1360-00 Department of Veterans Identifiers: 58VA21 Compensation and Pension 58VA22 Education 58VA28 Rehabilitation Records
(3) Provide the location where the specific applicable System of Records Notice(s) may be accessed (include the URL).
http://www.va.gov/oit/cio/foia/systems_of_records.asp
<i>IMPORTANT: For each applicable System of Records Notice that is not accessible via a URL: (1) Provide a concise explanation of why the System of Records Notice is not accessible via a URL in the "Additional Information" field at the end of this section, and (2) Send a copy of the System of Records Notice(s) to the Privacy Service.</i>
4.b.2) Have you read, and will the application comply with, all data management practices in the System of Records Notice(s)?
Yes

4.b.3) Was the System(s) of Records created specifically for this project, or created for another project or system?
Created specifically for this project
<i>If created for another project or system, briefly identify the other project or system.</i>
Not applicable
4.b.4) Does the System of Records Notice require modification?
<i>If "No" then skip to section 5, 'Data Collection'.</i>
Modification of the System of Records is NOT Required.
4.b.5) Describe the required modifications.
Not applicable
4.c) If the project and/or system data are not maintained under one or more approved System(s) of Records, select one of the following and provide a concise explanation.
Not Applicable
<i>Explanation:</i>
<i>ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)</i>

PIA SECTION 5

Project Name

Benefits Delivery Network (BDN) Maintenance and Operations-2009

5. DATA COLLECTION:

5.1 Data Types and Data Uses

Identify the types of personal information collected and the intended use(s) of that data:

a) Select all applicable data types below. If the provided data types do not adequately describe a specific data collection, select the "Other Personal Information" field and provide a description of the information.

b) For each selected data type, concisely describe how that data will be used.

Important Note: Please be specific. If different data types or data groups will be used for different purposes or multiple purposes, specify. For example: "Name and address information will be used to communicate with individuals about their benefits, while Name, Service, and Dependent's information will be used to determine which benefits individuals will be eligible to receive. Email address will be used to inform individuals about new services as they become available."

Yes Veteran's or Primary Subject's Personal Contact Information (name, address, telephone, etc.)

Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. The information collected includes: Name, Address, Social Security Number, Family/Dependents, martial Status, Medical Status, Birth Information, Death Information, Service Data; Reserve and Guard Participation, retired pay or severance pay, hazardous agent exposure, Branch of Service, duty date, released date, type of discharge, separation reason. In addition, provide medical records; military clinical records, government health records, vocational rehabilitation and employment records, line of duty investigations to include police reports; incarceration at federal, state or local facility, fugitive felon status, and/or investigative reports for some accidents. The database could contain additional veteran information such as: Guardian information; court proceedings, field examinations, appointment and bonding of fiduciaries, and annual accounts. The BDN database would also have veteran educational records such as: education program approval information, approved courses, effective dates, types of training, facility code, objective code and training type. Income verification is also used for veteran pension based decisions or entitlements.

Yes Other Personal Information of the Veteran or Primary Subject

Specifically identify the personal information collected, and describe the intended use of the information.

The information collected includes: Name, Address, Social Security Number, Family/Dependents, martial Status, Medical Status, Birth Information, Death Information, Service Data; Reserve and Guard Participation, retired pay or severance pay, hazardous agent exposure, Branch of Service, duty date, released date, type of discharge, separation reason. In addition, provide medical records; military clinical records, government health records, vocational rehabilitation and employment records, line of duty investigations to include police reports; incarceration at federal, state or local facility, fugitive felon status, and/or investigative reports for some accidents. The database could contain additional veteran information such as: Guardian information; court proceedings, field examinations, appointment and bonding of fiduciaries, and annual accounts. The BDN database would also have veteran educational records such as: education program approval information, approved courses, effective dates, types of training, facility code, objective code and training type. Income verification is also used for veteran pension based decisions or entitlements.

Yes	Dependent Information
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Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. System can contain dependent data of veteran such as: personal information including name and address, age, school status, relationship to the veteran and medical status. Additional benefit may be payable for dependents as well.

Yes	Service Information
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Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. All service data is collected; military service dates are used to determine entitlement to specific benefits.

Yes	Medical Information
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Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. The BDN database would contain veterans medical data such as: medical records, military clinical records, government health records, vocational rehabilitation and employment records and line of duty investigations. In addition, medical records are used to determine degree of disability, entitlement to automobile allowance, clothing allowance, special adapted housing allowances, and other special provisions or entitlements that the veteran may be eligible for.

Yes	Criminal Record Information
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Specifically identify the personal information collected, and describe the intended use of the information.

Most information is provided directly by the veteran. However, data is also collected from the Bureau of Prisons, American Red Cross, National Service Life Insurance (NSLI), Blinded American Veterans, Bureau of the Census, Veterans Government Life Insurance (VGLI), Veterans Mortgage Life Insurance (VMLI), Department of Defense (DOD), Department of Labor, Department of Treasury, Federal Parent Locator Service, General Accounting Office, Office of Inspector General, Office of Personnel Management, Small Business Administration and the Social Security Administration (SAA). An example of data that might reside in the BDN database of veteran criminal data would be: police records; incarceration at federal, state or local facility, fugitive felon status, and investigative reports of some accident or other criminal event. Records data may be used to determine basic entitlement and continued eligibility that could be reduced as a result of

incarceration.

Yes

Guardian Information

Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. The database could hold information such as: guardian information from court proceedings, field examinations, appointment and bonding of fiduciaries, annual accountings and other dependent information. Medical information would also be used to determine various guardian decisions; e.g., court ordered due to veteran unable to care for dependent.

Yes

Education Information

Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. The BDN would contain all approved educational programs and/or training completed; the education program approval information, approved courses, effective dates, types of training, facility codes, objective codes and training type.

Yes

Rehabilitation Information

Specifically identify the personal information collected, and describe the intended use of the information.

The BDN is the legacy system employed by the VBA to process entitlements for three VA mission areas: Compensation and Pension, Education and Vocational Rehabilitation and Employment. The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications 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. The service records would be required to support entitlement of vocational rehabilitation and also verification of employment records.

No

Other Personal Information (specify):

The "Other Personal Information" field is intended to allow identification of collected personal information that does not fit the provided categories. If personal information is collected that does not fit one of the provided categories, specifically identify this information and describe the intended use of the information.

This system is used for statistical and legislative inquiries. The information is used to determine eligibility for benefits, process ratings, and to provide payments via Department of Treasury. Other mail might inform veterans of changes in account status or advise about new options or increased benefits eligibility such as income information used to determine monthly eligibility. Information would be used to support the electronic file transfer of payments from Treasury to banking

institutions; employment verifications and employment history, etc.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

5.2 Data Sources

Identify the source(s) of the collected information.

a) Select all applicable data source categories provided below.

b) For each category selected:

i) Specifically identify the source(s) - identify each specific organization, agency or other entity that is a source of personal information. ii) Provide a concise description of why information is collected from that source(s). iii) Provide any required additional clarifying information.

Your responses should clearly identify each source of personal information, and explain why information is obtained from each identified source. (Important Note: This section addresses sources of personal information; Section 6.1, "User Access and Data Sharing" addresses sharing of collected personal information.)

Note: PIV projects should use the "Other Source(s)" data source.

Yes

Veteran Source

Provide a concise description of why information is collected from Veterans. Provide any required additional, clarifying information.

To determine eligibility for veterans benefits, either for compensation and pension, education and/or vocational rehabilitation an employment. DOD interchange that provides DD Form 214 into the VA BIRLS database.

Yes

Public Source(s)

i) Specifically identify the Public Source(s) - identify the specific organization(s) or other entity(ies) that supply personal information. ii) Provide a concise description of why information is collected from each identified source. iii) Provide any required additional, clarifying information.

In order to authorize electronic funds transfer from VA and the Department of Treasury to banking institutions, the veteran or the VA would provide certain pertinent data.

Yes

VA Files and Databases

i) Specifically identify each VA File and/or Database that is a source of personal information. ii) Provide a concise description of why information is collected from each identified source. iii) Provide any required additional, clarifying information.

To determine eligibility for veterans benefits, either for compensation and pension, education and/or vocational rehabilitation an employment. All VA IT systems such as BIRLS, VA Insurance System, National Cemetary Administration System and the Veterans Health Administration Systems.

Yes

Other Federal Agency Source(s)

i) Specifically identify each Federal Agency that is a source of personal information. ii) Provide a concise description of why information is collected from each identified source. iii) Provide any required additional, clarifying information.

To determine eligibility for veterans benefits, either for compensation and pension, education and/or vocational rehabilitation. Data input would be provided from the Social Security Administration for income verification, SSN match; SSA benefit information or death file notices; DOD (DFAS) data input, e.g. DD Form 214 (veteran service discharge document); and information from the Internal Revenue Service for income verification. Verification with Department of Treasury of payment history files; returned checks; potential input from Federal Bureau of Prisons; Office of Personnel Management for retirement information for pension based decisions; Department of Health Human Services in assisting in location of veterans; Defense Manpower Data Center (DMDC) for military reserve status, verification of active duty date; and monthly interfaces from DOD, DEFAS, Coast Guard, and DHHS.

Yes	State Agency Source(s)
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i) Specifically identify each State Agency that is a source of personal information. ii) Provide a concise description of why information is collected from each identified source. iii) Provide any required additional, clarifying information.

To determine eligibility for veterans benefits, either for compensation and pension, education and/or vocational rehabilitation an employment. For example inquiry to locate or verification of dependents. An primary example would be State government for requirement of veteran to provide child care payments in case of separation of marriage and judge had ruled for monthly child care payments to mother. The State government would not to ensure that those laws are adhered to. An another example would be for state welfare payments, if the veteran is receiving full compensation for disabilities, the state might provide lower payments based on veterans income.

No	Local Agency Source(s)
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i) Specifically identify each Local Agency (Government agency other than a Federal or State agency) that is a source of personal information. ii) Provide a concise description of why information is collected from each identified source. iii) Provide any required additional, clarifying information.

Not applicable

No	Other Source(s)
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i) If the provided Data Source categories do not adequately describe a source of personal information, specifically identify and describe each additional source of personal information. ii) For each identified data source, provide a concise description of why information is collected from that source. iii) Provide any required additional, clarifying information.

Not applicable

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

5.3 Collection Methods

Identify and describe how personal information is collected:

a) Select all applicable collection methods below. If the provided collection methods do not adequately describe a specific data collection, select the "Other Collection Method" field and provide a description of the collection method. b) For each collection method selected, briefly describe the collection method, and provide additional information as indicated.

Yes	Web Forms:	Information collected on Web Forms and sent electronically over the Internet to project systems.
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Identify the URL(s) of each Web site(s) from which information will be submitted, and the URL(s) of the associated privacy statement. (Note: This question only applies to Web forms that are submitted online. Forms that are accessed online, printed and then mailed or faxed are considered "Paper Forms.")

The VBA website is <http://www.vba.va.gov>; with the specific online form located at <http://vabenefits.vba.va.gov/vonapp/main.asp>. The available forms located at this site are: VA Form 21-526 - Veteran's Application for Compensation and/or Pension; VA Form 28-1900 - Disabled Application for Vocational Rehabilitation and VA Form 22-1990 - Application for Education Benefits. Applicants are also required to complete form 21-4242 - authorization and Consent to Release Information to the Department of Veterans Affairs (VA). All VBA benefit forms are located at <http://www.vba.va.gov/pubs/forms1.htm>. The VBA toll free number for benefits is 1-800-827-1000.

The BDN system is also used for statistical and legislative inquiries. The information is used to determine eligibility for benefits, process ratings, and to provide payments via the Department of Treasury.

Yes	Paper Forms:	Information collected on Paper Forms and submitted personally, submitted via Postal Mail and/or submitted via Fax Machine.
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Identify and/or describe the paper forms by which data is collected. If applicable, identify standard VA forms by form number.

VA Form 21-526 - Veteran's Application for Compensation and/or Pension VA Form 28-1900 - Disabled Veterans Application for Vocational Rehabilitation VA Form 22-1990 - Application for Education Benefits VA Form 21-4142 - Authorization and Consent to Release Information to the Dept of Veterans Affairs (VA). The primary services of the BDN entail the receipt, processing, tracking and disposition of veterans' applications for benefits, requests for assistance, and the general administration of legislated benefit programs. All information collected is to provide the entitled benefits in the most complete and effective manner to the veteran(s), dependent(s) and/or widow.

Yes	Electronic File Transfer:	Information stored on one computer/system (not entered via a Web Form) and transferred electronically to project IT systems.
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Describe the Electronic File Transfers used to collect information into project systems. (Note: This section addresses only data collection – how information stored in project systems is acquired. Sharing of information stored in project systems and data backups are addressed in subsequent sections.)

Data from the BDN databases are transferred to the US Treasury System to generate the veterans payments. Federal Agencies provide the required Privacy Act authorizations to handle such data. These files are encrypted using Connect Direct Secure Plus on the BDN IBM mainframe to the Treasury IBM mainframe. In addition, VBA is acquiring this security software for database file transfers to the VBA Corporate Systems, VBA Data Warehouse/Data Store Systems and VA Insurance Systems.

Yes	Computer Transfer Device:	Information that is entered and/or stored on one computer/ system and then transferred to project IT systems via an object
		or device that is used to store data, such as a CD-ROM, floppy disk or tape.

Describe the type of computer transfer device, and the process used to collect information.

The various media used with the BDN and these agencies listed below are primarily electronic file transfers, batch updates; CD-Roms and tape cartridges. Data interchange with Social Security Administration (SAA) Data interchange with

Internal Revenue Service (IRS) Data interchange with Department of Defense (DOD and/or DFAS) Federal Bureau of Investigations (FBI) Federal Bureau of Prisons (FOP) Department of Treasury

Yes	Telephone Contact:	Information is collected via telephone.
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Describe the process through which information is collected via telephone contacts.

The VBA toll free number for benefits is 1-800-827-1000. The veteran would be directed to the nearest VBA regional office to process and/or submit claims, obtain additional veteran eligibility information for veteran, dependent and/or widow, and if unable to do so via the existing web services how to obtain forms and instructions for mail in requests. The 1-800 number would also provide the veteran and/or claimant additional information for hospital inquiries and/or services.

No	Other Collection Method:	Information is collected through a method other than those listed above.
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If the provided collection method categories do not adequately describe a specific data collection, select the "Other Collection Method" field and specifically identify and describe the process used to collect information.

Not applicable.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

5.4 Notice

The Privacy Act of 1974 and VA policy requires that certain disclosures be made to data subjects when information in identifiable form is collected from them. The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

5.4.a) Is personally identifiable information collected directly from individual members of the public and maintained in the project's IT systems?

Yes

Note: If you have selected NO above, then SKIP to Section 5.5, 'Consent'.

5.4.b) Is the data collection mandatory or voluntary?

Mandatory

5.4.c) How are the individuals involved in the information collection notified of the Privacy Policy and whether provision of the information is mandatory or voluntary?

The following Privacy Act Information is provided to claimants when requesting information. 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, VA21/22/28 Compensation, Pension, Education and Rehabilitation Records - VA and published in the Federal Register. Your obligation to respond is required to obtain or retain benefits. Providing the the veteran's SSN account information is mandatory; as well as dependents SSN information is mandatory. Applicants are required to provide their SSN and the SSN of any dependents for whom benefits are claimed under title 38 USC 5101(C)(1). The VA will not deny any 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. Information that you furnish may be utilized in computer matching programs with other Federal or State agencies for the purpose of determining your eligibility to receive VA benefits, as well as to collect any amount owed to the United States by virtue of your participation in any benefit program administered by the Department of Veterans Affairs.

5.4.d) Is the data collection new or ongoing?

Ongoing

5.4.e.1) If personally identifiable information is collected online, is a privacy notice provided that includes the following elements? (Select all applicable boxes.)

No	Not applicable
Yes	Privacy notice is provided on each page of the application.
Yes	A link to the VA Website Privacy Policy is provided.
Yes	Proximity and Timing: the notice is provided at the time and point of data collection.
Yes	Purpose: notice describes the principal purpose(s) for which the information will be used.
Yes	Authority: notice specifies the legal authority that allows the information to be collected.
Yes	Conditions: notice specifies if providing information is voluntary, and effects, if any, of not providing it.
Yes	Disclosures: notice specifies routine use(s) that may be made of the information.

5.4.e.2) If necessary, provide an explanation on privacy notices for your project:

The BDN is a legacy application and no new enhancements have been applied to this system.

5.4.f) For each type of collection method used (identified in Section 5.3, "Collection Method"), explain:

a) What the subjects will be told about the information collection. b) How this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). c) How a privacy notice is provided.

Note: if PII is transferred from other projects, explain any agreements or understandings regarding notification of subjects.

Yes	Web Forms:
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Explain:

a) What the subjects will be told about the information collection. b) How this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). c) How a privacy notice is provided.

Answer above should be no. The BDN applications are legacy and are not processed on the web, however an application interface on the VBA modernized Unix/Tuxedo and Oracle open client Corporate System Application (SHARE) provide updates through batch processing.

Yes	Paper Forms:
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Explain:

a) What the subjects will be told about the information collection. b) How this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). c) How a privacy notice is provided.

Provided by correspondence to the veteran, widow or dependent claimant.

Yes	Electronic File Transfer:
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For electronic transfers of information, where this system is receiving the information from another system and is not collected from the primary information source, please explain what agreements are in place that govern the responsibilities of the system collecting information from the primary information source to notify subjects regarding:

a) What they will be told about the information collection? b) How the message will be conveyed (e.g. written notice, electronic notice if web-based collection, etc.)? c) How a privacy notice is provided?

Data from the BDN databases are transferred to the US Treasury System to generate the veterans payments. Federal Agencies provide the required Privacy Act authorizations to handle such data. These files are encrypted using Connect Direct Secure Plus on the BDN IBM mainframe to the Treasury IBM mainframe. In addition, VBA is acquiring this security software for database file transfers to the VBA Corporate Systems, VBA Data Warehouse/Data Store Systems and VA Insurance Systems.

Yes	Computer Transfer Device:
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For electronic transfers of information, where this system is receiving the information from another system and is not collected from the primary information source, please explain what agreements are in place that govern the responsibilities of the system collecting information from the primary information source to notify subjects regarding:

a) What they will be told about the information collection? b) How the message will be conveyed (e.g. written notice, electronic notice if web-based collection, etc.)? c) How a privacy notice is provided?

Provided by correspondence to the veteran, widow or dependent claimant. The VA requires applicants applying for benefits to complete VA Form 21-2142, Authorization and Consent to Release Information to the Department of Veterans Affairs.

Yes	Telephone:
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Explain:

a) What the subjects will be told about the information collection. b) How this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). c) How a privacy notice is provided.

Follow up would be provided by correspondence to the veteran, widow or dependent claimant.

No	Other Method:
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Explain:

a) What the subjects will be told about the information collection. b) How this message will be conveyed to them (e.g., written notice, electronic notice if a web-based collection, etc.). c) How a privacy notice is provided.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

5.5 Consent For Secondary Use of PII:

The Privacy Act and VA policy require that personally identifiable information only be used for the purpose(s) for which it was collected, unless consent (opt-in) is granted. Individuals must be provided an opportunity to provide consent for any secondary use of information, such as use of collected information for marketing.

5.5.a) Will personally identifiable information be used for any secondary purpose?

Note: If you have selected No above, then SKIP to question 5.6, "Data Quality."

Yes

5.5.b) Describe and justify any secondary uses of personal information.

Not applicable

5.5.c) For each collection method identified in question 5.3, "Collection Method," describe:

1) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. 2) The opportunities individuals have to grant consent for particular uses of the information. 3) How individuals may grant consent.

Some examples of consent methods are: (1) Approved OMB consent forms and (2) VA Consent Form (VA Form 1010EZ). Provide justification if no method of consent is provided.

Yes	Web Forms:
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Describe:

1) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. 2) The opportunities individuals have to grant consent for particular uses of the information. 3) How individuals may grant consent.

No should be above.

Yes	Paper Forms:
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Describe:

1) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. 2) The opportunities individuals have to grant consent for particular uses of the information. 3) How individuals may grant consent.

The veteran, widow and/or dependent (claimant) provide consent through the use of signed consent forms (VA Form 21-2142 Authorization and Consent to Release Information to the Department of Veterans Affairs); form submissions can be through a notarized indication of a Power of Attorney; or through authorized or verified signature. In addition, limited consent is provided as part of routine use as specified in various Privacy Act System of Record notifications.

Yes	Electronic File Transfer:
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For electronic transfers of information, where this system is receiving the information from another system and is not collected from the primary information source, please explain what agreements are in place that govern the responsibilities of the system collecting information from the primary information source to provide the following:

a) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. b) The opportunities individuals have to grant consent for particular uses of the information. c) How individuals may grant consent.

Data from the BDN databases are transferred to the US Treasury System to generate the veterans payments. Federal Agencies provide the required Privacy Act authorizations to handle such data. These files are encrypted using Connect Direct Secure Plus on the BDN IBM mainframe to the Treasury IBM mainframe. In addition, VBA is acquiring this security software for database file transfers to the VBA Corporate Systems, VBA Data Warehouse/Data Store Systems and VA Insurance Systems

Yes	Computer Transfer Device:
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For electronic transfers of information, where this system is receiving the information from another system and is not collected from the primary information source, please explain what agreements are in place that govern the responsibilities of the system collecting information from the primary information source to provide the following:

a) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. b) The opportunities individuals have to grant consent for particular uses of the information. c) How individuals may grant consent.

The veteran, widow and/or dependent (claimant) provide consent through the use of signed consent forms; can be

through a notarized indication of a Power of Attorney; or through authorized or verified signature. In addition, limited consent is provided as part of routine use as specified in various Privacy Act System of Record notifications.

Yes	Telephone Contact Media:
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Describe:

1) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. 2) The opportunities individuals have to grant consent for particular uses of the information. 3) How individuals may grant consent.

The veteran, widow and/or dependent (claimant) provide consent through the use of signed consent forms; can be through a notarized indication of a Power of Attorney; or through authorized or verified signature. In addition, limited consent is provided as part of routine use as specified in various Privacy Act System of Record notifications.

No	Other Media
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Describe:

1) The opportunities individuals have to decline to provide information, for instances where providing information is voluntary. 2) The opportunities individuals have to grant consent for particular uses of the information. 3) How individuals may grant consent.

Not applicable. All veterans, widows and/or dependents requesting federally mandated legislated benefits must comply with all required data for determination of eligibility.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

5.6 Data Quality

5.6.a) Explain how collected data are limited to required elements:

Data collection is not limited but only the required (by application) veteran's data is stored within the databas(s) which support the individual claim or claims that the veteran has been granted. In order to process a records claim, for example request is for educational benefits, the veteran would be required to provide service dates, social security number, date of discharge, etc., to verify information that would be in the BIRLS database. If the veterans claims is for compensation, then medical records and doctor physical examinations would be required to be provided by the veteran.

5.6.b) How is data checked for completeness?

Data is checked by system audits, manual verifications and annual questionnaires through automated veteran letters from the BDN system. These letters ask specific questions for verification based on the existing entitlement or benefit that the veteran is receiving. For example, certain data such as monthly rates of compensation and pension are updated on an annual basis, other data is updated as a result of returned mail, or returned direct deposits, or through contact with claimants after a significant event affecting their entitlement or benefit.

5.6.c) What steps or procedures are taken to ensure the data are current and not out of date?

The veterans data is validated by computer matches and verifications, by system audits, also matched with Social Security Administration (SSN verification); other data is updated as a result of returned mail (incorrect address), returned direct deposits, or through contact with claimants after events that may impact their existing entitlement.

5.6.d) How is new data verified for relevance, authenticity and accuracy?

All data is matched against supporting claim documentation submitted by the veteran, widow or dependent. Prior to any award or entitlement authorization(s) by the VBA, the veteran record is manually reviewed and data validated to ensure correct entitlement has been authorized. The data is also verified by computer matches and system audits.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

Project Name

Benefits Delivery Network (BDN) Maintenance and Operations-2009

6. Use and Disclosure

6.1 User Access and Data Sharing

Identify the individuals and organizations that have access to system data.

--> *Individuals - Access granted to individuals should be limited to the data needed to perform their assigned duties. Individuals with access to personal information stored in project system must be identified, and documented assurance must be provided that appropriate policies and procedures are in place to prevent as well as detect unauthorized access and browsing.*

--> *Other Agencies – Any Federal, State or local agencies that have authorized access to collected personal information must be identified, and documented assurance must be provided that appropriate policies and procedures are in place to protect personal information.*

--> *Other Systems – Information systems of other programs or projects that interface with the information system(s) of this project must be identified and the transferred data must be defined. Also, the controls that are in place to ensure that only the defined data are transmitted must be defined.*

6.1.a) Identify all individuals and organizations that will have access to collected information. Select all applicable items below.

Yes	System Users
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Yes	System Owner, Project Manager
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Yes	System Administrator
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No	Contractor
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If contractors to VA have access to the system, describe their role and the extent of access that is granted to them. Also, identify the contract(s) that they operate under.

Not applicable

Yes	Internal Sharing: Veteran Organization
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If information is shared internally, with other VA organizations identify the organization(s). For each organization, identify the information that is shared and for what purpose.

BDN information is accessed by the Veterans Health Administration (VHA) to determine hospital care eligibility. VHA accesses the BDN using the HINQ application (Hospital Inquiry Command). In addition, the National Cemetery Administration (NCA) accesses the BDN to determine veteran burial eligibility through an interface with the NCA Burial Award System. The system has documented Memorandums of Understanding Agreements with all of its VA business partners, federal agencies, state agencies and local agencies in regard to confidential business information, Privacy Act and certain information that is subject to confidentiality protections. The federal agencies mentioned are as follows: Department of Defense, Social Security Administration, Federal housing Administration, Internal Revenue Service, and Department of Housing and Urban Development.

Yes	Other Veteran Organization
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If information is shared with a Veteran organization other than VA, identify the organization(s). For each organization, identify the information that is shared and for what purpose.

The system has documented Memorandums of Understanding Agreements with all of its VA business partners, such as Veterans Service Organizations (VSO), authorized individuals that provide veteran power of attorney representation for benefit claims inquiry only and authorized Educational Institutions, The user access is restricted by the level of authority required to perform their function in support of veterans benefit claims processing. All veterans records are automatically coded of what end-user accessed that record. The BDN system includes authorization at the application and function level. The users may have inquiry access, update and/or verifier authority to different command screens but all access is tracked to individual end user that accesses any veteran record by internal audit controls within the BDN system.

Yes	Other Federal Government Agency
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If information is shared with another Federal government agency(ies), identify the agency(ies). For each organization, identify the information that is shared and for what purpose.

The system has documented Memorandums of Understanding Agreements with all of its VA business partners, federal agencies, state agencies and local agencies in regard to confidential business information, Privacy Act and certain information that is subject to confidentiality protections. The federal agencies mentioned are as follows: Department of Defense, Social Security Administration, Federal housing Administration, Internal Revenue Service, and Department of Housing and Urban Development.

Yes	State Government Agency
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If information is shared with a State government agency(ies), identify the agency(ies). For each organization, identify the information that is shared and for what purpose.

To determine eligibility for veterans benefits, either for compensation and pension, education and/or vocational rehabilitation an employment. For example inquiry to locate or verification of dependents. A primary example would be State government agency inquiry requirement of veteran(s) to provide child support care payments in case of separation of marriage and judge had ruled monthly child care payments. The State government agency would require those laws adhered to. A second example would be for state welfare payments; if the veteran is receiving full compensation for disabilities; than the state government agency might provide for lower payments based on the veterans income.

No	Local Government Agency
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If information is shared with a local government agency(ies), identify the agency(ies). For each organization, identify the information that is shared and for what purpose.

Not applicable

Yes	Other Project/ System
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If information is shared with other projects or systems:

1) Identify the other projects and/or systems, and briefly describe the data sharing. 2) For each project and/or system with which information will be shared, identify the information that will be shared with that project or system. 3) For each project and/or system with which information will be shared, describe why information is shared. 4) For each project and/or system with which information will be shared, describe who will be responsible for protecting the privacy rights of the individuals whose data will be shared across this interface.

The BDN records are shared with the BIRLS (Benefit Inquiry Record Locator System), the VA Insurance System and the Department of Treasury for payment of veterans claims; and income verification matches are conducted with the Social

Security Administration and Internal Revenue Service.

No	Other User(s)
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If information is shared with persons or organization(s) that are not described by the categories provided, use this field to identify and describe what other persons or organization(s) have access to personal information stored on project systems. Also, briefly describe the data sharing.

6.1.a.1) Describe here who has access to personal information maintained in project's IT systems:

All employees that are authorized to access and process veterans claims are provided specific passwords that allow them to obtain or access data within the BDN and/or the VBA Corporate system. Approximately 12,000 end-users access the IT systems supporting this data. In addition Veterans Service Organizations and attorney's that have power of attorney over veterans have restricted access to the BDN for inquiry only. The veterans service record, social security number, date of birth, etc., is available from the BIRLS record inquiry system. For example, the hospital can log into BIRLS for inquiry into that database to verify status of veteran for eligibility for admission into the hospital.

6.1.b) How is access to the data determined?

Access is determined by the level of authority required to process various veterans claims, approval of claims and disposition of claims. The access levels are provided through strict controls and passwords that are assigned to individual end-users. There are security logs of all passwords provided and the access levels granted which are reviewed daily to determine any unauthorized access attempts.

6.1.c) Are criteria, procedures, controls, and responsibilities regarding access documented? If so, identify the documents.

This system has documented Memorandums of Understanding/Agreement with all of its business partners, including veteran organizations, federal agencies, state agencies, and local agencies in regard to confidential business information, Privacy Act, and certain information that is subject to confidentiality protections. This includes all the entities mentioned previously within this document and includes the Department of Defense, the Social Security Administration, Educational Institutions, Federal Housing Administration, Internal Revenue Service and the Department of Housing and Urban Development. VBA has emplaced strict control measures to prevent the inadvertent or deliberate release of information to non-authorized personnel. The BDN has documented Memorandums of Understanding/Agreement with business partners, including veteran service organizations and federal agencies, in regard to sensitive personal and business information, Privacy Act information and certain information that is subject to confidentiality protections. Approved users complete access requests and sign "Rules of Behavior" statements. The VBA employs strict control measures to prevent the inadvertent or deliberate release of information to unauthorized personnel.

6.1.d) Will users have access to all data on the project systems or will user access be restricted? Explain.

The end user access is restricted by the level of authority they would require to perform their jobs. All veterans records that are accessed are automatically coded of what end-user performed work on that claim or accessed that veteran record. The BDN system includes authorization at the application and function level. Users may have inquiry, update and/or verifier authority to different screens but all access can be tracked to individual end-user of that particular veteran record by internal audit controls within the BDN system.

6.1.e) What controls are in place to prevent the misuse (e.g. unauthorized browsing) of data by those having access? (Please list processes and training materials that specifically relate to unauthorized browsing)

The BDN system has built in alerts that will be flagged if anyone tries to access any veteran records outside of their individual authorization permissions. These alerts messages are compiled into daily reports that are provided to the Information Security Officers (ISO) and are reviewed to verify what incidents took place and depending on degree of error, corrective action is followed through. The system has journal voucher audit trails that are reviewed to identify any unauthorized access to veterans records.

6.1.f) Is personal information shared (is access provided to anyone other than the system users, system owner, Project Manager, System Administrator)? (Yes/No)

Yes

Note: If you have selected No above, then SKIP to question 6.2, "Access to Records and Requests for Corrections".

6.1.g) Identify the measures taken to protect the privacy rights of the individuals whose data will be shared.

Controls to prevent misuse include signed Rules of Behavior statements of users, security policies and access procedures, strong passwords, security awareness training and audit trails. All veterans records that are accessed by users are coded by user identifiers.

6.1.h) Identify who is responsible, once personal information leaves your project's IT system(s), for ensuring that the information is protected.

The other systems do not access this data on-line but the data is provided by interface files and becomes as appropriate a part of the receiving system. For example, the VBA Corporate system could submit an inquiry into the BDN database for veteran match to determine if a claim has already been approved and authorized. The BIRLS database contains veterans service record, date of birth and social security number. This information is considered confidential and the reviewing official would adhere to the privacy rules governing that specific system.

6.1.i) Describe how personal information that is shared is transmitted or disclosed.

The VBA is in the process of implementing software for electronic data transfer that will provide encryption of all files from the BDN to VBA Corporate, BIRLS and VA Insurance System. The target date for encryption software implementation is September 2006.

6.1.j) Is a Memorandum of Understanding (MOU), contract, or any other agreement in place with all external organizations with whom information is shared, and does the agreement reflect the scope of the information currently shared? If an MOU is not in place, is the sharing covered by a routine use in the System of Records Notice? If not, explain the steps being taken to address this omission.

Yes, the system has documented Memorandums of Understanding Agreements with all of its business partners, veteran organizations, federal agencies, and state agencies in reference to access to veterans privacy data.

6.1.k) How is the shared information secured by the recipient?

The recipients of any BDN data are required to sign rules of behavior to assist in prevention of unauthorized disclosure of privacy information.

6.1.l) What type of training is required for users from agencies outside VA prior to receiving access to the information?

Unknown

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

6.2 Access to Records and Requests for Corrections

The Privacy Act and VA policy provide certain rights and mechanisms by which individuals may request access to and amendment of information relating to them that is retained in a System of Records.

6.2.a) How can individuals view instructions for accessing or amending data related to them that is maintained by VA? (Select all applicable options below.)

No	The application will provide a link that leads to their information.
No	The application will provide, via link or where data is collected, written instructions on how to access/amend their information.
Yes	The application will provide a phone number of a VA representative who will provide instructions.
Yes	The application will use other method (explain below).
No	The application is exempt from needing to provide access.

6.2.b) What are the procedures that allow individuals to gain access to their own information?

Individuals may request information concerning their benefits/claims status from the VBA Regional Office in their area. In addition, individuals may also request their information under the Freedom of Information Act. However, employees are not allowed to access their records. Strong security measures are input in the BDN system that will not allow end users to access their own information. If they attempt, this violation is flagged and reports are generated by the Information Security Officers (ISO) and acted upon either at the local regional office level or at the data center.

6.2.c) What are the procedures for correcting erroneous information?

The BDN security logs are generated on a daily basis. The VBA Internal Control Staff and the VBA Regional Office ISO's receive reports that are reviewed for inconsistencies and can verify what access has been attempted. The ISO's produce

monthly reports that are reviewed by the Hines Senior ISO to ensure no unauthorized access has been allowed into the BDN system. If any violations are detected, the appropriate officials are notified to correct the incident.

6.2.d) *If no redress is provided, are alternatives available?*

The Office of Field Operations and local Regional Office Director(s) are notified to remove/restrict and/or monitor end user BDN access that is attempting to perform unauthorized access to veterans records.

6.2.e) *Provide here any additional explanation; if exempt, explain why the application is exempt from providing access and amendment.*

Any person who wishes to determine whether a record is maintained under in the BDN System under his or her name or other personal identifier, or who has a routine inquiry concerning the status of his or her established benefits claims in process may contact the nearest VBA Regional Office. All requests concerning the specific content of a record must be in writing or in person to the VBA Regional Office and/or Insurance Center.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

7 Retention and Disposal

By completing this section, you provide documented assurance that proper data retention and disposal practices are in place.

The "Retention and disposal" section of the applicable System of Records Notice(s) often provides appropriate and sufficiently detailed documented data retention and disposal practices specific to your project.

VA HBK 6300.1 Records Management Procedures explains the Records Control Schedule procedures.

System of Records Notices may be accessed via:

<http://vaww.vhaco.va.gov/privacy/SystemofRecords.htm>

or

http://vaww.va.gov/foia/err/enhanced/privacy_act/privacy_act.html

For VHA projects, VHA Handbook 1907.1 (Section 6j) and VHA Records Control Schedule 10-1 provide more general guidance.

VHA Handbook 1907.1 may be accessed at:

http://www1.va.gov/vhapublications/ViewPublication.asp?pub_ID=434

For VBA projects, Records Control Schedule (RCS) VB-1 provides more general guidance. VBA Records Control Schedule (RCS) VB-1 may be accessed via the URL listed below.

[Start by looking at the http://www.warms.vba.va.gov/20rcs.html](http://www.warms.vba.va.gov/20rcs.html)

7.a) *What is the data retention period? Given the purpose of retaining the information, explain why the information is needed for the indicated period.*

The data retention period for BDN data is contained in RCS VBA-1, Part I, ITen Number 08-065.000 and subparagraphs, which state "Destroy files data in accordance with system design." All active and terminated veterans records are retained indefinitely; therefore, there are no procedures for eliminating data. Data on active records is changeable. Prior copies of active records and their changed values are also retained. Additional backup copies of all data is stored in an off-site location indefinitely. The active veterans records are stored within the systems; if the veterans claim status is deemed non-active, then those records would be archived off the system and electronic images or backup of that veterans record would be stored on disk keep for a minimum of seventy five years.

7.b) *What are the procedures for eliminating data at the end of the retention period?*

The veterans records are not eliminated but are stored either on tape or disk indefinitely. The VA has detailed retention requirements, however, there is little reference to retention requirements for electronic records. The current working practice is to retain the electronic patient/veteran record for 75 years after the last episode of patient care or any benefit activity for that veteran. At the present time, this project retains all images. We are performing a study to explore

whether some images can be eliminated on an earlier schedule.

7.c) Where are procedures documented?

The procedures are part of the daily operations of the BDN payment system. If veterans records are inactive, the master record remains in the Beneficiary Identification Record Locator System (BIRLS). If the veterans records are active (benefit claims have been awarded) these records remain within the BDN databases.

7.d) How are data retention procedures enforced?

Daily journal logs are generated and tape backups are performed daily which are stored off site. In addition a duplicate set of the back up tapes are stored for the BDN Disaster Recovery platform installed at the Philadelphia ITC.

7.e) If applicable, has the retention schedule been approved by the National Archives and Records Administration (NARA)?

Yes

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

8 SECURITY

OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, (OMB M-03-22) specifies that privacy impact assessments must address how collected information will be secured.

8.1 General Security Measures

8.1.a) Per OMB guidance, citing requirements of the Federal Information Security Management Act, address the following items (select all applicable boxes.):

Yes	The project is following IT security requirements and procedures required by federal law and policy to ensure that information is appropriately secured.
Yes	The project has conducted a risk assessment, identified appropriate security controls to protect against that risk, and implemented those controls.
Yes	Security monitoring, testing, and evaluating are conducted on a regular basis to ensure that controls continue to work properly, safeguarding the information.

8.1.b) Describe the security monitoring, testing, and evaluating that is conducted on a regular basis:

The BDN security logs are generated on a daily basis. The VBA Internal Control Staff and the VBA Regional Office Information Security Officers receives reports that can be reviewed for inconsistencies and can verify what access has been attempted. The ISO's produce monthly reports that are reviewed by the Hines ISO to ensure no unauthorized access has been allowed into the BDN system. In addition, the Hines ITC provides LAN/WAN security monitoring detection through various off the shelf commercial products to ensure the networks that access the BDN are not being hacked into and reports are generated monthly to Hines ITC Director.

8.1.c) Is adequate physical security in place to protect against unauthorized access?

Yes

8.2 Project-Specific Security Measures

8.2.a) Provide a specific description of how collected information will be secured.

• A concise description of how data will be protected against unauthorized access, unauthorized modification, and how the availability of the system will be protected.

• A concise description of the administrative controls (Security Plans, Rules of Behavior, Procedures for establishing user accounts, etc.).

• A concise description of the technical controls (Access Controls, Intrusion Detection, etc.) that will be in place to safeguard the information.

• Describe any types of controls that may be in place to ensure that information is used in accordance with the above described uses. For example, are audit logs regularly reviewed to ensure appropriate use of information? Are strict disciplinary programs in place if an individual is found to be inappropriately using the information?

Note: Administrative and technical safeguards must be specific to the system covered by the PIA, rather than an overall description of how the VA's network is secured. Does the project/system have its own security controls, independent of the VA network? If so, describe these controls.

All information stored in VBA databases is secured in agreement with VA strategy. This strategy implements Federal Regulations, VA IT security policy and guidelines, NIST Guidelines and industry best practices. Security is implemented in compliance with VA's Office of Cyber and Information Security (OCIS) guidelines, policies, and mandates. With guidance from OCIS, the VBA administers and monitors security controls on multiple operating levels including the managerial, operational and technical levels. This System uses strong passwords. Access is granted on the principles of least privilege and separation of duties. Users have completed ethics training, annual cybersecurity training, and have signed rules of behavior. All security controls are implemented through a cohesive security structure and is geared to maintaining risk to information and information resources to acceptable levels. In addition to documented risk management, other management level controls such as system security planning, certification and accreditation and security reviews are also implemented to assure that controls reflect management policies at operational levels including at the enterprise, business line and project level. Operational and technical controls such as contingency planning, input/output settings, data integrity and validation measures and logical access controls, are implemented on the various network, system, server and application levels to assure that information is secured in transit, process and storage. For example, the VA employs a virtual private network to assure the privacy of information in transit. This system works in conjunction with strong authentication measures to ensure and authenticate the identification of VA network users. System interconnection agreements (SIA)s are a system level measure to ensure that all interconnected systems meet minimum VA access policies for interconnected systems from within and outside the VA wide area network (WAN) boundaries. Moreover, the VA employs a comprehensive incidence response unit to respond to unwanted incursions and institutes enterprise level anti-virus system to protect mission critical applications on the desktop. Finally, the VA security program is an iterative program with repeatable processes that, in an ongoing basis, will mitigate vulnerabilities, minimize security exposures and maintain security and operating risk at acceptable levels. A security plan has been developed that documents the procedures required ensuring the integrity, confidentiality, and availability to VA information. Specifically, personnel security, physical protection, production input/output controls, contingency planning, system hardware and software maintenance controls, security awareness and training, and incident response capabilities are discussed in detail. The details contained within these sections include specific activities and procedures, which ultimately ensure that the integrity, confidentiality, and availability to VA information contained within the system is protected as required by Federal policy. All files, records, reports, and other papers and documents pertaining to any claim under any of the laws administered by the Department of Veterans Affairs and the names and addresses of present or former members of the Armed Forces, and their dependents, in the possession of the Department shall be confidential and privileged. This specifically includes all individually identifiable health information of a veteran, which is stored electronically and in hard copy form. All works or items of intellectual property used, transmitted, stored, or disseminated by the Department as part of the this initiative, in any form, including electronic or physical, will be used in conformance with laws and regulations applicable to copyright, patent, trademark, or licensing of such works.

8.2.b) Explain how the project meets IT security requirements and procedures required by federal law.

An annual assessment of security controls are conducted to ensure that IT security requirements are being met.

9. CHANGE RECORD

OMB Memorandum M-03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, mandates that PIAs address any project/ system changes that potentially create new privacy risks. By completing this section, you provide documented assurance that significant project/ system modifications have been appropriately evaluated for privacy-related impacts.

9.a Since the last PIA submitted, have any significant changes been made to the system that might impact the privacy of people whose information is retained on project systems? (Yes, No, n/a: first PIA)

No

If no, then proceed to Section 10, "Children's Online Privacy Protection Act."

If yes, then please complete the information in the table below. List each significant change on a separate row. 'Significant changes' may include:

Conversions - when converting paper-based records to electronic systems;

Anonymous to Non-Anonymous - when functions applied to an existing information collection change anonymous information into information in identifiable form;

Significant System Management Changes - when new uses of an existing IT system, including application of new technologies, significantly change how information in identifiable form is managed in the system:

• For example, when an agency employs new relational database technologies or web-based processing to access multiple data stores; such additions could create a more open environment and avenues for exposure of data that previously did not exist.

Significant Merging - when agencies adopt or alter business processes so that government databases holding information in identifiable form are merged, centralized, matched with other databases or otherwise significantly manipulated:

• For example, when databases are merged to create one central source of information; such a link may aggregate data in ways that create privacy concerns not previously at issue.

New Public Access - when user-authenticating technology (e.g., password, digital certificate, biometric) is newly applied to an electronic information system accessed by members of the public;

Commercial Sources - when agencies systematically incorporate into existing information systems databases of information in identifiable form purchased or obtained from commercial or public sources. (Merely querying such a source on an ad hoc basis using existing technology does not trigger the PIA requirement);

New Interagency Uses - when agencies work together on shared functions involving significant new uses or exchanges of information in identifiable form, such as the cross-cutting E-Government initiatives; in such cases, the lead agency should prepare the PIA;

Internal Flow or Collection - when alteration of a business process results in significant new uses or disclosures of information or incorporation into the system of additional items of information in identifiable form:

• For example, agencies that participate in E-Gov initiatives could see major changes in how they conduct business internally or collect information, as a result of new business processes or E-Gov requirements. In most cases the focus will be on integration of common processes and supporting data. Any business change that results in substantial new requirements for information in identifiable form could warrant examination of privacy issues.

Alteration in Character of Data - when new information in identifiable form added to a collection raises the risks to personal privacy (for example, the addition of health or financial information);

List All Major Project/System Modification(s)	State Justification for Modification(s)	*Concisely describe:	Modification Approver	Date

* The effect of the modification on the privacy of collected personal information

* How any adverse effects on the privacy of collected information were mitigated.

10. CHILDREN'S ONLINE PRIVACY PROTECTION ACT

10.a) Will information be collected through the Internet from children under age 13?

No

If "No" then SKIP to Section 11, "PIA Considerations".

10.b) How will parental or guardian approval be obtained.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

11. PIA CONSIDERATIONS

11) Identify what choices were made regarding the project/system or collection of information as a result of performing the PIA. Examples of choices made include reconsideration of: collection source, collection methods, controls to mitigate misuse of information, provision of consent and privacy notice, and security controls.

As a result of performing the PIA, continual emphasis and attention will be applied to addressing security and privacy concerns including assuring that collection of data and personal information contains appropriate consent and release information and that all information stored in VBA databases are secured per VA security standards.

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

Not applicable

12. PUBLIC AVAILABILITY

The Electronic Government Act of 2002 requires that VA make this PIA available to the public. This section is intended to provide documented assurance that the PIA is reviewed for any potentially sensitive information that should be removed from the version of the PIA that is made available to the public.

The following guidance is excerpted from M-03-22, "OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002," Section II.C.3, "Review and Publication": iii. Agencies must ensure that the PIA document and, if prepared, summary, are made publicly available (consistent with executive branch policy on the release of information about systems for which funding is proposed).

1. Agencies may determine to not make the PIA document or summary publicly available to the extent that publication would raise security concerns, reveal classified (i.e., national security) information or sensitive information (e.g., potentially damaging to a national interest, law enforcement effort or competitive business interest) contained in an assessment⁹. Such information shall be protected and handled consistent with the Freedom of Information Act (FOIA).

2. Agencies should not include information in identifiable form in their privacy impact assessments, as there is no need for the PIA to include such information. Thus, agencies may not seek to avoid making the PIA publicly available on these grounds.

12.a) Does this PIA contain any sensitive information that could cause harm to the Department of Veterans Affairs or any party if disclosed to the public?

No

12.b) If yes, specify:

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)

13. ACCEPTANCE OF RESPONSIBILITY AND ACKNOWLEDGEMENT OF ACCOUNTABILITY:

13.1) I have carefully reviewed the responses to each of the questions in this PIA. I am responsible for funding and procuring, developing, and integrating privacy and security controls into the project. I understand that integrating privacy and security considerations into the project may affect the development time and cost of this project and must be planned for accordingly. I will ensure that VA privacy and information security policies, guidelines, and procedures are followed in the development, integration, and, if applicable, the operation and maintenance of this application.

Yes

13.2) Project Manager/Owner Name and Date (mm/dd/yyyy)

Stephen Mercier VBA OIM IT Operations (20SB) BDN Exhibit 300 08/22/07

ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)