

Welcome to the PIA for FY 2010!

Congress passed the E-Government Act of 2002 to encourage the use of Web-based Internet applications or other information technology by Government agencies, with the intention of enhancing access to government information and services and increasing the effectiveness, efficiency, and quality of government operations.

To combat public concerns regarding the disclosure of private information, the E-Government Act mandated various measures, including the requirement that Federal agencies conduct a Privacy Impact Assessment (PIA) for projects with information technology systems that collect, maintain, and/or disseminate "personally identifiable information" of the public. Personally identifiable information, or "personal information," is information that may be used to identify a specific person.

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.

Directions:

VA 6508 is the directive which outlines the PIA requirement for every System/Application/Program. More information can be found by reading VA 6508.

If you find that you can't click on checkboxes, make sure that you are: 1) Not in "design mode" and 2) you have enabled macros.

PIA Website: <http://vawww.privacy.va.gov/PIA.asp>

Roles and Responsibilities:

Roles and responsibilities for the specific process are clearly defined for all levels of staff in the Privacy Impact Assessment Handbook 6202.2 referenced in the procedure section of this document.

- a. The Privacy Officer is responsible for the overall coordination and review of the PIA to ensure compliance with VA Handbook 6202.2.
- b. Records Officer is responsible for supplying records retention and deletion schedules.
- c. Information Technology (IT) staff responsible for the privacy of the system data will perform a PIA in accordance with VA Handbook 6202.2 and to immediately report all anomalies to the Privacy Service and appropriate management chain.
- d. Information Security Officer (ISO) is responsible for assisting the Privacy Officer and providing information regarding security controls.
- e. The CIO is responsible for ensuring that the systems under his or her jurisdiction undergo a PIA. This responsibility includes identifying the IT systems, coordinating with the Privacy Officer, Information Security Officer, and others who have concerns about privacy and security issues, and

systems; coordinating with the Privacy Officer, Information Security Officer, and others who have concerns about privacy and security issues; and reviewing and approving the PIA before submission to the Privacy Service.

Definition of PII (Personally Identifiable Information)

Information in identifiable form that is collected and stored in the system that either directly identifies an individual by name, address, social security number, telephone number, e-mail address, biometric identifiers, photograph, or other unique numbers, codes or characteristics or combined, indirectly identify an individual such as a combination of gender, race, birth date, geographical indicators, license number is also considered PII.

Macros Must Be Enabled on This Form

To enable macros, go to: 1) Tools > Macros > Security - Set to Medium; 2) Click OK; 3) Close the file and when reopening click on Enable Macros at the prompt.

(FY 2010) PIA: System Identification

Program or System Name: REGION1>VHA>VISN 22>Southern Nevada HCS>VISTA

OMB Unique System / Application / Program

Identifier (AKA: UPID #): 029-00-01-11-01-1180-00

Description of System / Application / Program: The VistA system is the software platform and hardware infrastructure (associated with clinical operations) on which the Southern Nevada Healthcare System facilities operate their software applications. It includes the computer equipment associated with clinical operations and the employees necessary to operate the system. VistA is a client-server system. It links the facility computer network to over 100 applications and databases VistA provides critical data that supports the delivery of healthcare to veterans and their dependants. Using the computer, the VA health care provider can access VistA-Legacy applications and meet a wide range of health care data needs. The VistA system operates in medical center, ambulatory and community-based clinics. The VistA system is in the mature phase of the capital investment lifecycle.

Facility Name: VA Southern Nevada Healthcare System

Title:	Name:	Phone:
Privacy Officer:	Gwen Shockley	702-636-3000 ext 3136
Information Security Officer:	Tennile Connor	702-636-3000 ext 3554
Chief Information Officer:	Jui-an Hsu	702-636-3000 ext 3086
Person Completing Document:	Gwen Shockley	702-636-3000 ext 3136
Other Titles:	James Laub	408-325-3131

Other Titles:

Other Titles:

Date of Last PIA Approved by VACO Privacy

Services: (MM/YYYY) 08/2009

Date Approval To Operate Expires: 08/2011

What specific legal authorities authorize this program or system:

Title 38, USC, Section 7301(a)

What is the expected number of individuals that will have their PII stored in this system:

100,000 - 300,000

Identify what stage the System / Application / Program is at:

Operations/Maintenance

The approximate date (MM/YYYY) the system will be operational (if in the Design or Development stage), or the approximate number of years the system/application/program has been in operation.

12 years

Is there an authorized change control process which documents any changes to existing applications or systems?

Yes

If No, please explain:

Has a PIA been completed within the last three years?

Yes

Date of Report (MM/YYYY):

Please check the appropriate boxes and continue to the next TAB and complete the remaining questions on this form.

- Have any changes been made to the system since the last PIA?
- Is this a PIV system/application/program collecting PII data from Federal employees, contractors, or others performing work for the VA?
- Will this system/application/program retrieve information on the basis of name, unique identifier, symbol, or other PII data?
- Does this system/application/program collect, store or disseminate PII/PHI data?
- Does this system/application/program collect, store or disseminate the SSN?

Does this system/application/program collect, store or disseminate the SSN?

If there is no Personally Identifiable Information on your system , please skip to TAB 12. (See Comment for Definition of PII)

Email:

gwen.shockley@va.gov

tennile.connor@va.gov

jui-an.hsu@va.gov

gwen.shockley@va.gov

james.laub@va.gov



work for the VA?

er PII data?



(FY 2010) PIA: System of Records

Is the data maintained under one or more approved System(s) of Records?

Yes

if the answer above is no, please skip to row 16.

For each applicable System(s) of Records, list:

1. All System of Record Identifier(s) (number):

79VA19

2. Name of the System of Records:

Vista-VA

3. Location where the specific applicable System of Records Notice may be accessed (include the URL):

http://www.rms.oit.va.gov/SOR_Records.asp

Have you read, and will the application, system, or program comply with, all data management practices in the System of Records Notice(s)?

Yes

Does the System of Records Notice require modification or updating?

No

(Please Select Yes/No)

Is PII collected by paper methods?

Yes

Is PII collected by verbal methods?

Yes

Is PII collected by automated methods?

Yes

Is a Privacy notice provided?

Yes

Proximity and Timing: Is the privacy notice provided at the time of data collection?

Yes

Purpose: Does the privacy notice describe the principal purpose(s) for which the information will be used?

Yes

Authority: Does the privacy notice specify the effects of providing information on a voluntary basis?

Yes

Disclosures: Does the privacy notice specify routine use(s) that may be made of the information?

Yes

—

—

—

—

—

—

(FY 2010) PIA: Notice

Please fill in each column for the data types selected.

Data Type	Collection Method	What will the subjects be told about the information collection?	How is this message conveyed to them?	How is a privacy notice provided?
Veteran or Primary Subject's Personal Contact Information (name, address, telephone, etc)	ALL	Healthcare	Verbal & Written	Verbal & Written
Family Relation (spouse, children, parents, grandparents, etc)	Verbal	contact information, such as name and telephone number, is collected from the	Verbally	Verbal & Written
Service Information				
Medical Information	ALL	Healthcare	Verbal & Written	Verbal & Written
Criminal Record Information				
Guardian Information	Paper	Next of kin, DNR instructions, health care proxy designation. This information is used in the notification process and as required for medical decisions.	Verbally	Verbal & Written
Education Information				
Benefit Information	Paper	On the 1010ez, how the information is to be used.	Written	Verbal & Written
Other (Explain)				

Data Type	Is Data Type Stored on your system?	Source (If requested, identify the specific file, entity and/or name of agency)	Is data collection Mandatory or Voluntary?	Additional Comments
Veteran or Primary Subject's Personal Contact Information (name, address, telephone, etc)	Yes	Veteran	Voluntary	
Family Relation (spouse, children, parents, grandparents, etc)	Yes	Veteran	Voluntary	
Service Information				
Medical Information	Yes	Veteran	Voluntary	
Criminal Record Information				
Guardian Information	Yes	Veteran	Voluntary	
Education Information				

Benefit Information	Yes	Veteran	Voluntary
Other (Explain)			
Other (Explain)			
Other (Explain)			

(FY 2010) PIA: Data Sharing

Organization	Name of Agency/Organization	Do they access this system?	Identify the type of Data Sharing and its purpose.	Is PII or PHI Shared?	What is the procedure you reference for the release of information?
Internal Sharing: VA Organization	No				
Other Veteran Organization	No				
Other Federal Government Agency	No				
State Government Agency	No				
Local Government Agency	No				
Research Entity	No				
Other Project / System					
Other Project / System					
Other Project / System					

(FY 2010) PIA: Access to Records

Does the system gather information from another system? No
 Please enter the name of the system:

Per responses in Tab 4, does the system gather information from an individual? Yes

If information is gathered from an individual, is the information provided:
 Through a Written Request
 Submitted in Person
 Online via Electronic Form

Is there a contingency plan in place to process information when the system is down? Yes

(FY 2010) PIA: Secondary Use

Will PII data be included with any secondary use request? No

if yes, please check all that apply:
 Drug/Alcohol Counseling Mental Health HIV
 Research Sickle Cell Other (Please Explain)

Describe process for authorizing access to this data.

Answer:

(FY 2010) PIA: Program Level Questions

Does this PIA form contain any sensitive information that could cause harm to the Department of Veterans Affairs or any party if disclosed to the public? No

If Yes, Please Specify:

Explain how collected data are limited to required elements:

Answer: Data is collected electronically based on the automation of VA forms and clinical procedures.

How is data checked for completeness?

Answer: Data is reviewed by staff and compared to paper forms

What steps or procedures are taken to ensure the data remains current and not out of date?

Answer: Clinical data is not removed. Administrative data is updated with each application for care.

How is new data verified for relevance, authenticity and accuracy?

Answer: New data is compared with printed form or via patient verification

Additional Information: (Provide any necessary clarifying information or additional explanation for this section.)

Answer:

(FY 2010) PIA: Retention & Disposal

What is the data retention period?

Answer: Clinical information is retained in accordance with VA Records Control Schedule 10-1.

Demographic information is updated as applications for care are submitted and retained in accordance with VA Records Control Schedule 10-1.

Explain why the information is needed for the indicated retention period?

Answer: To be in compliance with VA Handbook 6300; Record Control Schedule 10-1

What are the procedures for eliminating data at the end of the retention period?

Answer: Electronic Final Version of Patient Medical Record is destroyed/deleted 75 years after the last episode of patient care as instructed in VA Records Control Schedule 10-1, Item XLIII, 2.b. (Page 190).

Where are these procedures documented?

Answer: VA Handbook 6300; Record Control Schedule 10-1

How are data retention procedures enforced?

Answer: Oversight by the local Records Manager; local policy put into place.

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.)

Answer:

(FY 2010) PIA: Children's Online Privacy Protection Act (COPPA)

Will information be collected through the internet from children under age 13?

No

If Yes, How will parental or guardian approval be obtained?

Answer:

(FY 2010) PIA: Additional Comments

Add any additional comments on this tab for any question in the form you want to comment on.
Please indicate the question you are responding to and then add your comments.

(FY 2010) PIA: VBA Minor Applications

Explain what minor application that are associated with your installation? (Check all that apply)

Records Locator System	Education Training Website	Appraisal System
Veterans Assistance Discharge System (VADS)	VR&E Training Website	Web Electronic Lender Identification
LGY Processing	VA Reserve Educational Assistance Program	CONDO PUD Builder
Loan Service and Claims	Web Automated Verification of Enrollment	Centralized Property Tracking System
LGY Home Loans	Right Now Web	Electronic Appraisal System
Search Participant Profile (SPP)	VA Online Certification of Enrollment (VA-ONCE)	Web LGY
Control of Veterans Records (COVERS)	Automated Folder Processing System (AFPS)	Access Manager
SHARE	Personal Computer Generated Letters (PCGL)	SAHSHA
Modern Awards Process Development (MAP-D)	Personnel Information Exchange System (PIES)	VBA Data Warehouse
Rating Board Automation 2000 (RBA2000)	Rating Board Automation 2000 (RBA2000)	Distribution of Operational Resources (DOOR)
State of Case/Supplemental (SOC/SSOC)	SHARE	Enterprise Wireless Messaging System (Blackberry)
Awards	State Benefits Reference System	VBA Enterprise Messaging System
Financial and Accounting System (FAS)	Training and Performance Support System (TPSS)	LGY Centralized Fax System
Eligibility Verification Report (EVR)	Veterans Appeals Control and Locator System (VACOLS)	Review of Quality (ROQ)
Automated Medical Information System (AMIS)290	Veterans On-Line Applications (VONAPP)	Automated Sales Reporting (ASR)
Web Automated Reference Material System (WARMS)	Automated Medical Information Exchange II (AIME II)	Electronic Card System (ECS)
Automated Standardized Performance Elements Nationwide (ASPEN)	Committee on Waivers and Compromises (COWC)	Electronic Payroll Deduction (EPD)
Inquiry Routing Information System (IRIS)	Common Security User Manager (CSUM)	Financial Management Information System (FMI)
National Silent Monitoring (NSM)	Compensation and Pension (C&P)	Purchase Order Management System (POMS)
Web Service Medical Records (WebSMR)	Record Interchange (CAPRI)	Veterans Canteen Web
Systematic Technical Accuracy Review (STAR)	Control of Veterans Records (COVERS)	Inventory Management System (IMS)
Fiduciary STAR Case Review	Corporate Waco, Indianapolis, Newark, Roanoke, Seattle (Corporate WINRS)	Synquest
Veterans Exam Request Info System (VERIS)	Fiduciary Beneficiary System (FBS)	RAI/MDS
Web Automated Folder Processing System (WAFPS)	Hearing Officer Letters and Reports System (HOLAR)	ASSISTS
Courseware Delivery System (CDS)	Inforce	MUSE
Electronic Performance Support System (EPSS)	Awards	Bbraun (CP Hemo)
Veterans Service Representative (VSR) Advisor	Actuarial	VIC
Loan Guaranty Training Website	Insurance Self Service	BCMA Contingency Machines
C&P Training Website	Insurance Unclaimed Liabilities	Script Pro
	Insurance Online	

Explain any minor application that are associated with your installation that does not appear in the list above. Please provide name, brief description, and any comments you may wish to include.

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #1	<input type="checkbox"/> Does this minor application store PII?	
	If yes, where?	
	Who has access to this data?	

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #2	<input type="checkbox"/> Does this minor application store PII?	
	If yes, where?	
	Who has access to this data?	

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #3	<input type="checkbox"/> Does this minor application store PII?	
	If yes, where?	
	Who has access to this data?	

Baker System	Veterans Assistance Discharge System (VADS)
Dental Records Manager	VBA Training Academy
Sidexis	Veterans Service Network (VETSNET) Waco Indianapolis, Newark, Roanoke, Seattle (WINRS)
Priv Plus Mental Health Assistant	BIRLS Centralized Accounts Receivable System (CARS)
Telecare Record Manager	
Omnicell	Compensation & Pension (C&P)
Powerscribe Dictation System	Corporate Database
EndoSoft	Control of Veterans Records (COVERS)
Compensation and Pension (C&P)	Data Warehouse
Montgomery GI Bill Vocational Rehabilitation & Employment (VR&E) CH 31 Post Vietnam Era educational Program (VEAP) CH 32	INS - BIRLS Mobilization Master Veterans Record (MVR)
Spinal Bifida Program Ch 18	BDN Payment History
C&P Payment System	
Survivors and Dependents Education Assistance CH 35	
Reinstatement Entitlement Program for Survivors (REAPS) Educational Assistance for Members of the Selected Reserve Program CH 1606	
Reserve Educational Assistance Program CH 1607 Compensation & Pension Training Website	
Web-Enabled Approval Management System (WEAMS)	
FOCAS Work Study Management System (WSMS)	
Benefits Delivery Network (BDN) Personnel and Accounting Integrated Data and Fee Basis (PAID) Personnel Information Exchange System (PIES) Rating Board Automation 2000 (RBA2000)	
SHARE Service Member Records Tracking System	

(FY 2010) PIA: VISTA Minor Applications

Explain what minor application that are associated with your installation? (Check all that apply)

x	ACCOUNTS RECEIVABLE	x	DRUG ACCOUNTABILITY	x	INPATIENT MEDICATIONS	x
	ADP PLANNING (PLANMAN)		DSS EXTRACTS	x	INTAKE/OUTPUT	x
x	ADVERSE REACTION TRACKING		EDUCATION TRACKING	x	INTEGRATED BILLING	x
x	ASISTS	x	EEO COMPLAINT TRACKING		INTEGRATED PATIENT FUNDS	x
	AUTHORIZATION/SUBSCRIPTION	x	ELECTRONIC SIGNATURE		INTERIM MANAGEMENT SUPPORT	
x	AUTO REPLENISHMENT/WARD STOCK	x	ENGINEERING	x	KERNEL	x
	AUTOMATED INFO COLLECTION SYS		ENROLLMENT APPLICATION SYSTEM		KIDS	
	AUTOMATED LAB INSTRUMENTS	x	EQUIPMENT/TURN-IN REQUEST		LAB SERVICE	
	AUTOMATED MED INFO EXCHANGE	x	EVENT CAPTURE		LETTERMAN	
x	BAR CODE MED ADMIN		EVENT DRIVEN REPORTING	x	LEXICON UTILITY	x
x	BED CONTROL		EXTENSIBLE EDITOR	x	LIBRARY	
x	BENEFICIARY TRAVEL	x	EXTERNAL PEER REVIEW		LIST MANAGER	
	CAPACITY MANAGEMENT - RUM	x	FEE BASIS	x	MAILMAN	x
x	CAPRI	x	FUNCTIONAL INDEPENDENCE		MASTER PATIENT INDEX VISTA	x
	CAPACITY MANAGEMENT TOOLS		GEN. MED. REC. - GENERATOR		MCCR NATIONAL DATABASE	x
x	CARE MANAGEMENT		GEN. MED. REC. - I/O	x	MEDICINE	x
x	CLINICAL CASE REGISTRIES		GEN. MED. REC. - VITALS	x	MENTAL HEALTH	x
	CLINICAL INFO RESOURCE NETWORK	x	GENERIC CODE SHEET	x	MICOM	
	CLINICAL MONITORING SYSTEM		GRECC		MINIMAL PATIENT DATASET	x
x	CLINICAL PROCEDURES		HEALTH DATA & INFORMATICS		MYHEALTHVET	
x	CLINICAL REMINDERS		HEALTH LEVEL SEVEN	x	Missing Patient Reg (Original) A4EL	x
x	CMOP	x	HEALTH SUMMARY	x	NATIONAL DRUG FILE	x
x	CONSULT/REQUEST TRACKING	x	HINQ	x	NATIONAL LABORATORY TEST	x
	CONTROLLED SUBSTANCES		HOSPITAL BASED HOME CARE		NDBI	x
x	CPT/HCPCS CODES		ICR - IMMUNOLOGY CASE REGISTRY	x	NETWORK HEALTH EXCHANGE	x
	CREDENTIALS TRACKING	x	IFCAP	x	NOIS	
x	DENTAL	x	IMAGING	x	NURSING SERVICE	x
x	DIETETICS	x	INCIDENT REPORTING	x	OCCURRENCE SCREEN	x
x	DISCHARGE SUMMARY		INCOME VERIFICATION MATCH	x	ONCOLOGY	
x	DRG GROUPER	x	INCOMPLETE RECORDS TRACKING	x	ORDER ENTRY/RESULTS REPORTING	x

Explain any minor application that are associated with your installation that does not appear in the list above. Please provide name, brief description, and any comments you may wish to include.

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #1	<input type="checkbox"/> Does this minor application store PII? <input type="checkbox"/> If yes, where?	
	<input type="checkbox"/> Who has access to this data?	

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #2	<input type="checkbox"/> Does this minor application store PII? <input type="checkbox"/> If yes, where?	
	<input type="checkbox"/> Who has access to this data?	

Name	Description	Comments
<input type="checkbox"/> Is PII collected by this min or application?		
Minor app #3	<input type="checkbox"/> Does this minor application store PII? <input type="checkbox"/> If yes, where?	
	<input type="checkbox"/> Who has access to this data?	

OUTPATIENT PHARMACY	X	SOCIAL WORK
PAID	X	SPINAL CORD DYSFUNCTION
PATCH MODULE	X	SURGERY
PATIENT DATA EXCHANGE	X	SURVEY GENERATOR
PATIENT FEEDBACK	X	TEXT INTEGRATION UTILITIES
PATIENT REPRESENTATIVE	X	TOOLKIT
PCE PATIENT CARE ENCOUNTER		UNWINDER
PCE PATIENT/IHS SUBSET	X	UTILIZATION MANAGEMENT ROLLUP
PHARMACY BENEFITS MANAGEMENT	X	UTILIZATION REVIEW
PHARMACY DATA MANAGEMENT		VA CERTIFIED COMPONENTS - DSSI
PHARMACY NATIONAL DATABASE	X	VA FILEMAN
PHARMACY PRESCRIPTION PRACTICE	X	VBECS
POLICE & SECURITY	X	VDEF
PROBLEM LIST		VENDOR - DOCUMENT STORAGE SYS
PROGRESS NOTES	X	VHS&RA ADP TRACKING SYSTEM
PROSTHETICS	X	VISIT TRACKING
QUALITY ASSURANCE INTEGRATION	X	VISTALINK
QUALITY IMPROVEMENT CHECKLIST		VISTALINK SECURITY
QUASAR		VISUAL IMPAIRMENT SERVICE TEAM ANRV
RADIOLOGY/NUCLEAR MEDICINE		VOLUNTARY TIMEKEEPING
RECORD TRACKING		VOLUNTARY TIMEKEEPING NATIONAL
REGISTRATION	X	WOMEN'S HEALTH
RELEASE OF INFORMATION - DSSI		CARE TRACKER
REMOTE ORDER/ENTRY SYSTEM		
RPC BROKER		
RUN TIME LIBRARY SAGG		
SCHEDULING		
SECURITY SUITE UTILITY PACK		
SHIFT CHANGE HANDOFF TOOL		

(FY 2010) PIA: Minor Applications

Add any information concerning minor applications that may be associated with your system. Please indicate the name of the minor application, a brief description, and any comments you may wish to include. If you have more than 3 minor applications please copy then below sections as many times as needed.

Minor app #1	Name		Description	Comments
		<input type="checkbox"/>	Is PII collected by this min or application?	
		<input type="checkbox"/>	Does this minor application store PII?	
			If yes, where?	
		Who has access to this data?		

Minor app #2	Name		Description	Comments
		<input type="checkbox"/>	Is PII collected by this min or application?	
		<input type="checkbox"/>	Does this minor application store PII?	
			If yes, where?	
		Who has access to this data?		

Minor app #3	Name		Description	Comments
		<input type="checkbox"/>	Is PII collected by this min or application?	
		<input type="checkbox"/>	Does this minor application store PII?	
			If yes, where?	
		Who has access to this data?		

(FY 2010) PIA: Final Signatures

Facility Name: VA Southern Nevada Healthcare System

Title:	Name:	Phone:	Email:
Privacy Officer:	Gwen Shockley	702-636-3000 ext 3136	gwen.shockley@va.gov
Digital Signature Block			
Information Security Officer:	Tennile Connor	702-636-3000 ext 3554	tennile.connor@va.gov
Digital Signature Block			
Chief Information Officer:	Jui-an Hsu	702-636-3000 ext 3086	jui-an.hsu@va.gov
Digital Signature Block			
Person Completing Document:	Gwen Shockley	702-636-3000 ext 3136	gwen.shockley@va.gov
Digital Signature Block			
System / Application / Program Manager:	James Laub	408-325-3131	james.laub@va.gov
Digital Signature Block			

Date of Report: 1/0/1900

OMB Unique Project Identifier 029-00-01-11-01-1180-00

Project Name

REGION1>VHA>VISN 22>Southern
Nevada HCS>VISTA

Compatibility Report for Copy of FY2010-pia-template-11-12-09.xls
Run on 3/12/2010 10:26

The following features in this workbook are not supported by earlier versions of Excel. These features may be lost or degraded when you save this workbook in an earlier file format.

Minor loss of fidelity

of occurrences

Some formulas in this workbook are linked to other workbooks that are closed. When these formulas are recalculated in earlier versions of Excel without opening the linked workbooks, characters beyond the 255-character limit cannot be returned.

4
Defined Names