(FY 2011) PIA: System Identification

Program or System Name:	General Counsel Legal Automation Workload System (GCLAWS)
OMB Unique System / Application / Program Identifier (AKA: UPID #):	
Description of System/ Application/ Program:	GCLAWS is used for case management, correspondence control, and statistical analysis. GCLAWS
Facility Name:	

Title:	Name:	Phone:	Email:
Privacy Officer:	Susan Sokoll	202-461-7623	Susan.Sokoll@va.gov
Information Security Officer:	Keneath Coleman	202-461-5122	Keneath.Coleman@va.gov
System Owner/ Chief Information Officer:			
Information Owner:	Will A. Gunn	202-461-4995	Will.Gunn@va.gov
Other Titles:	General Counsel		
Person Completing Document:	Susan Sokoll		Susan.Sokoll@va.gov
Other Titles:	Law Librarian		
Date of Last PIA Approved by VACO Privacy Services: (MM/YYYY)			07/2008
Date Approval To Operate Expires:			07/2011

What specific legal authorities authorize this program or system:	Title 38 U.S.C., Section 501
What is the expected number of individuals that will have their PII stored in this system:	100,000-999,999
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.	Operational since 2000. GCLAWS is a successor system to the Regional Counsel Management Information System (RCMIS).
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?

If there is no Personally Identifiable Information on your system , please complete TAB 7 & TAB 12. (See Comment for Definition of PII)

(FY 2011) PIA: System of Records

Is the data maintained under one or more approved System(s) of Records? If the answer above no, please skip to row 15.	Yes
For each applicable System(s) of Records, list:	
1. All System of Record Identifier(s) (number):	144VA026
2. Name of the System of Records:	General Counsel Legal Automated Workload System (GCLAWS)
3. Location where the specific applicable System of Records Notice may be accessed (include the URL):	http://edocket.access.gpo.gov/2007/pdf/E7-18464.pdf
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?	No
Is PII collected by verbal methods?	No
Is PII collected by automated methods?	No
Is a Privacy notice provided?	No
Proximity and Timing: Is the privacy notice provided at the time of data collection?	No
Purpose: Does the privacy notice describe the principal purpose(s) for which the information will be used?	No
Authority: Does the privacy notice specify the effects of providing information on a voluntary basis?	No
Disclosures: Does the privacy notice specify routine use(s) that may be made of the information?	No

(FY 2011) 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)				
Family Relation (spouse, children, parents, grandparents, etc)				
Service Information				
Medical Information				
Criminal Record Information				
Guardian Information				
Education Information				
Benefit Information				
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)				
Family Relation (spouse, children, parents, grandparents, etc)				
Service Information				

Medical Information	Yes	VA Files / Databases (Identify file)	Voluntary	Obtained from records held by another part of the agency.
Criminal Record Information	No			
Guardian Information	Yes	VA Files / Databases (Identify file)	Voluntary	Obtained from records held by another part of the agency.
Education Information	Yes	VA Files / Databases (Identify file)	Voluntary	Obtained from records held by another part of the agency.
Benefit Information	Yes	VA Files / Databases (Identify file)	Voluntary	Obtained from records held by another part of the agency.
Other (Explain) VA Employee Information	Yes	VA Files / Databases (Identify file)		Obtained from records held by another part of the agency.
Other (Explain)				
Other (Explain)				

(FY 2011) 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		N/A	
Other Veteran Organization		No			
Other Federal Government Agency		No		N/A	
State Government Agency		No			
Local Government Agency		No			
Research Entity		No			
Other Project / System					
Other Project / System					
Other Project / System					

(FY 2011) 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? No

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? No

(FY 2011) 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: Access to GCLAWS information must be requested through the OGC Privacy Office. Request for information will be evaluated using FOIA/PA standards to determine releasability.

(FY 2011) 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?

If Yes, Please Specify:

Explain how collected data are limited to required elements:

Answer: Data collected is limited to the attorney working on the case/litigation

How is data checked for completeness?

Answer: Information is provided via case file from the agency and the agency is required to ensure data is complete and accurate

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

Agency checks

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

Answer: Data is entered by hand from paper records. Data is verified through use of successive assignees within the system.

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

Answer: Data is scheduled by type of underlying record and/or case (e.g., tort, FOIA/PA, benefits, EEO, etc.). Classes of records are aged out of GCALWS. Each item slated for potential deletion is reviewed by the creating attorney prior to deletion to insure that all anticipated legal contigencies are provided for. If the attorney does not indicate that a record should be save, the record will be deleted. If the attorney requests an extention of the retention period

(FY 2011) PIA: Retention & Disposal

What is the data retention period?

Answer: Data is retained from 2 years to fifty years depending on the underlying type of data stored. GCLAWS does not contain a single particular type of information, but rather contains information on every matter that OGC might encounter representing DVA.

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

Answer: Data is needed for the length of the retention to meet the needs of possible litigation.

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

Answer: Records scheduled for destruction are reviewed by creating attorney. If there is a compelling need to retain records beyond the established retention period, the attorney assigns a new retention period (not to exceed the original period).

Where are these procedures documented?

Answer: GCLAWS has an online HELP section that documents procedures. RCS : N1-15-11-1

How are data retention procedures enforced?

Answer: System Manager and OGC Records Manager assign retention periods to classes of records based on the OGC RCS.

Has t. .etention schedule been approved by the National Archives and R. rds Administration (NARA) Yes

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

Answer

(FY 2011) 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 2011) PIA: Security

Is the system/application/program following IT security Requirements and procedures required by federal law and policy to ensure that information is appropriately secured. Yes

Has the system/application/program conducted a risk assessment, identified appropriate security controls to protect against that risk, and implemented those controls.. Yes

Is security monitoring conducted on at least a quarterly basis to ensure that controls continue to work properly, safeguarding the information? Yes

Is security testing conducted on at least a quarterly basis to ensure that controls continue to work properly, safeguarding the information? Yes

Are performance evaluations conducted on at least a quarterly basis to ensure that controls continue to work properly, safeguarding the information? Yes

If 'No' to any of the 3 questions above, please describe why:

Answer:

Is adequate physical security in place to protect against unauthorized access? Yes

If 'No' please describe why:

Answer: GCLAWS is maintained on internal DVA computers behind the firewall. Access is strictly limited to those with need to know. Back-up tapes are numbered and monitored. Back-up tapes are stored in a locked room in an official DVA facility requiring badge to gain access.

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

Answer: System is a standalone system maintained on its own server behind the DVA firewall. The system does not interact with any other VA computer system.

Explain what security risks were identified in the security assessment? *(Check all that apply)*

- ☐ Air Conditioning Failure
- ☐ Chemical/Biological Contamination
- ☐ Blackmail
- ☐ Bomb Threats
- ☐ Burglary/Break In/Robbery
- ☐ Cold/Frost/Snow
- ☐ Communications Loss
- ☐ Computer Intrusion
- ☐ Computer Misuse
- ☐ Data Destruction
- ☑ Data Disclosure
- ☐ Data Integrity Loss
- ☐ Denial of Service Attacks
- ☐ Earthquakes
- ☐ Eavesdropping/Interception
- ☑ Errors (Configuration and Data Entry)
- ☐ Fire (False Alarm, Major, and Minor)
- ☐ Flooding/Water Damage
- ☐ Fraud/Embezzlement
- ☐ Hardware Failure
- ☐ Identity Theft
- ☐ Malicious Code
- ☐ Power Loss
- ☐ Sabotage/Terrorism
- ☐ Storms/Hurricanes
- ☐ Substance Abuse
- ☐ Theft of Assets
- ☐ Theft of Data
- ☐ Vandalism/Rioting

☐ Data Destruction

☐ Fraud/Embezzlement

☐ Vandalism/Rioting

Answer: (Other Risks)

Explain what security controls are being used to mitigate these risks. *(Check all that apply)*

- [x] Access Control
- [ ] Audit and Accountability
- [x] Awareness and Training
- [ ] Certification and Accreditation Security Assessments
- [x] Configuration Management
- [ ] Contingency Planning
- [ ] Identification and Authentication
- [x] Incident Response
- [ ] Media Protection
- [ ] Personnel Security
- [x] Physical and Environmental Protection
- [ ] Risk Management

Answer: (Other Controls)

PIA: PIA Assessment

Identify what choices were made regarding the project/system or collection of information as a result of performing the PIA.

Answer: GCLAWS is a self-contained system maintained on VA computers behind the DVA firewall. Access is limited to OGC personnel with a need to

Availability Assessment: If the data being collected is not available to process for any reason what will the potential impact be upon the system or organization? **(Choose One)**	[ ] The potential impact is **high** if the loss of availability could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. [ ] The potential impact is **moderate** if the loss of availability could be expected to have a serious adverse effect on operations, assets or individuals. [x] The potential impact is **low** if the loss of availability could be expected to have a limited adverse effect on operations, assets or individuals.
Integrity Assessment: If the data being collected has been corrupted for any reason what will the potential impact be upon the system or organization? **(Choose One)**	[ ] The potential impact is **high** if the loss of integrity could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. [ ] The potential impact is **moderate** if the loss of integrity could be expected to have a serious adverse effect on operations, assets or individuals. [x] The potential impact is **low** if the loss of integrity could be expected to have a limited adverse effect on operations, assets or individuals.
Confidentiality Assessment: If the data being collected has been shared with unauthorized individuals what will the potential impact be upon the system or organization? **(Choose One)**	[ ] The potential impact is **high** if the loss of confidentiality could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. [ ] The potential impact is **moderate** if the loss of confidentiality could be expected to have a serious adverse effect on operations, assets or individuals. [x] The potential impact is **low** if the loss of confidentiality could be expected to have a limited adverse effect on operations, assets or individuals.

The controls are being considered for the project based on the selections from the previous assessments?

The ultimate objective is to conduct the day-to-day operations of the VA and to accomplish our stated mission with what the Office of Management and Budget (OMB) Circular A-130 defines as adequate security including the magnitude of harm to individuals, the VA, or its assets resulting from the unauthorized access, use, disclosure, disruption, modification, or destruction of information. Many of the security controls such as contingency planning controls, incident response controls, security training and awareness controls, personnel security controls, physical and environmental protection controls, and intrusion detection controls are common security controls used throughout the VA. Our overall security controls follow NIST SP800-53 low impact defined set of controls.

(FY 2011) PIA: Additional Comments

Add any additional comments or information that may have been left out for any question. Please indicate the question you are responding to and then add your comments.

GCLAWS relies on collection of information from other VA information processing systems. This information is not collected through direct link, but instead is transferred via paper document. The information is entered from the paper documents into GCLAWS. GCLAWS does not maintain any direct link and/or access to any other DVA information system.

(FY 2011) PIA: VBA Minor Applications

Which of these are sub-components of your system? None

Access Manager
Actuarial
Appraisal System
ASSISTS
Awards
Awards
Baker System
Bbraun (CP Hemo)
BDN Payment History
BIRLS
C&P Payment System
C&P Training Website
CONDO PUD Builder
Corporate Database
Data Warehouse
EndoSoft
FOCAS
Inforce
INS - BIRLS
Insurance Online
Insurance Self Service
LGY Home Loans
LGY Processing
Mobilization
Montgomery GI Bill
MUSE
Omnicell
Priv Plus
RAI/MDS
Right Now Web
SAHSHA
Script Pro
SHARE
SHARE
SHARE
Sidexis
Synquest

Automated Sales Reporting (ASR)
BCMA Contingency Machines
Benefits Delivery Network (BDN)
Centralized Property Tracking System
Common Security User Manager (CSUM)
Compensation and Pension (C&P)
Control of Veterans Records (COVERS)
Control of Veterans Records (COVERS)
Control of Veterans Records (COVERS)
Courseware Delivery System (CDS)
Dental Records Manager
Education Training Website
Electronic Appraisal System
Electronic Card System (ECS)
Electronic Payroll Deduction (EPD)
Eligibility Verification Report (EVR)
Fiduciary Beneficiary System (FBS)
Fiduciary STAR Case Review
Financial and Accounting System (FAS)
Insurance Unclaimed Liabilities
Inventory Management System (IMS)
LGY Centralized Fax System
Loan Service and Claims
Loan Guaranty Training Website
Master Veterans Record (MVR)
Mental Health Asisstant
National Silent Monitoring (NSM)
Powerscribe Dictation System
Rating Board Automation 2000 (RBA2000)
Rating Board Automation 2000 (RBA2000)
Rating Board Automation 2000 (RBA2000)
Records Locator System
Review of Quality (ROQ)
Search Participant Profile (SPP)
Spinal Bifida Program Ch 18
State Benefits Reference System
State of Case/Supplemental (SOC/SSOC)

Automated Folder Processing System (AFPS)
Automated Medical Information Exchange II (AIME II)
Automated Medical Information System (AMIS)290
Automated Standardized Performace Elements Nationwide (ASPEN)
Centralized Accounts Receivable System (CARS)
Committee on Waivers and Compromises (COWC)
Compensation and Pension (C&P) Record Interchange (CAPRI)
Compensation & Pension Training Website
Corporate Waco, Indianapolis, Newark, Roanoke, Seattle (Corporate WINRS)
Distribution of Operational Resources (DOOR)
Educational Assistance for Members of the Selected Reserve Program CH 1606
Electronic Performance Support System (EPSS)
Enterprise Wireless Messaging System (Blackberry)
Financial Management Information System (FMI)
Hearing Officer Letters and Reports System (HOLAR)
Inquiry Routing Information System (IRIS)
Modern Awards Process Development (MAP-D)
Personnel and Accounting Integrated Data and Fee Basis (PAID)
Personal Computer Generated Letters (PCGL)
Personnel Information Exchange System (PIES)
Personnel Information Exchange System (PIES)
Post Vietnam Era educational Program (VEAP) CH 32
Purchase Order Management System (POMS)
Reinstatement Entitelment Program for Survivors (REAPS)
Reserve Educational Assistance Program CH 1607
Service Member Records Tracking System
Survivors and Dependents Education Assistance CH 35
Systematic Technical Accuracy Review (STAR)
Training and Performance Support System (TPSS)
VA Online Certification of Enrollment (VA-ONCE
VA Reserve Educational Assistance Program
Veterans Appeals Control and Locator System (VACOLS)
Veterans Assistance Discharge System (VADS)
Veterans Exam Request Info System (VERIS)
Veterans Service Representative (VSR) Advisor
Vocational Rehabilitation & Employment (VR&E) CH 31
Waco Indianapolis, Newark, Roanoke, Seattle (WINRS)

VBA Data Warehouse
VBA Training Academy
Veterans Canteen Web
VIC
VR&E Training Website
Web LGY
Telecare Record Manager
VBA Enterprise Messaging System
Veterans On-Line Applications (VONAPP)
Veterans Service Network (VETSNET)
Web Electronic Lender Identification
Web Automated Folder Processing System (WAFPS)
Web Automated Reference Material System (WARMS)
Web Automated Verification of Enrollment
Web-Enabled Approval Management System (WEAMS)
Web Service Medical Records (WebSMR)
Work Study Management System (WSMS)

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
Is PII collected by this min or application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

Name
Description
Comments
Is PII collected by this min or application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

Name
Description
Comments
Is PII collected by this min or application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

(FY 2011) PIA: VISTA Minor Applications

Which of these are sub-components of your system? None

ASISTS	Beneficiary Travel	Accounts Receivable	Adverse Reaction Tracking
Bed Control	Care Management	ADP Planning (PlanMan)	Authorization/ Subscription
CAPRI	Care Tracker	Bad Code Med Admin	Auto Replenishment/ Ward Stock
CMOP	Clinical Reminders	Clinical Case Registries	Automated Info Collection Sys
Dental	CPT/ HCPCS Codes	Clinical Procedures	Automated Lab Instruments
Dietetics	DRG Grouper	Consult/ Request Tracking	Automated Med Info Exchange
Fee Basis	DSS Extracts	Controlled Substances	Capacity Management - RUM
GRECC	Education Tracking	Credentials Tracking	Capacity Management Tools
HINQ	Engineering	Discharge Summary	Clinical Info Resource Network
IFCAP	Event Capture	Drug Accountability	Clinical Monitoring System
Imaging	Extensible Editor	EEO Complaint Tracking	Enrollment Application System
Kernal	Health Summary	Electronic Signature	Equipment/ Turn-in Request
Kids	Incident Reporting	Event Driven Reporting	Gen. Med.Rec. - Generator
Lab Service	Intake/ Output	External Peer Review	Health Data and Informatics
Letterman	Integrated Billing	Functional Independence	ICR - Immunology Case Registry
Library	Lexicon Utility	Gen. Med. Rec. - I/O	Income Verification Match
Mailman	List Manager	Gen. Med. Rec. - Vitals	Incomplete Records Tracking
Medicine	Mental Health	Generic Code Sheet	Interim Mangement Support
MICOM	MyHealthEVet	Health Level Seven	Master Patient Index VistA
NDBI	National Drug File	Hospital Based Home Care	Missing Patient Reg (Original) A4EL
NOIS	Nursing Service	Inpatient Medications	Order Entry/ Results Reporting
Oncology	Occurrence Screen	Integrated Patient Funds	PCE Patient Care Encounter
PAID	Patch Module	MCCR National Database	Pharmacy Benefits Mangement
Prosthetics	Patient Feedback	Minimal Patient Dataset	Pharmacy Data Management
QUASER	Police & Security	National Laboratory Test	Pharmacy National Database
RPC Broker	Problem List	Network Health Exchange	Pharmacy Prescription Practice
SAGG	Progress Notes	Outpatient Pharmacy	Quality Assurance Integration
Scheduling	Record Tracking	Patient Data Exchange	Quality Improvement Checklist
Social Work	Registration	Patient Representative	Radiology/ Nuclear Medicine
Surgery	Run Time Library	PCE Patient/ HIS Subset	Release of Information - DSSI
Toolkit	Survey Generator	Security Suite Utility Pack	Remote Order/ Entry System
Unwinder	Utilization Review	Shift Change Handoff Tool	Utility Management Rollup
VA Fileman	Visit Tracking	Spinal Cord Dysfunction	CA Vertified Components - DSSI
VBECS	VistALink Security	Text Integration Utilities	Vendor - Document Storage Sys
VDEF	Women's Health	VHS & RA Tracking System	Visual Impairment Service Team ANRV
VistALink		Voluntary Timekeeping	Voluntary Timekeeping National

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
Is PII collected by this minor application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

Name
Description
Comments
Is PII collected by this minor application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

Name
Description
Comments
Is PII collected by this minor application?
Does this minor application store PII?
If yes, where?
Who has access to this data?

(FY 2011) PIA: Final Signatures

Facility Name: General Counsel Legal Automation Workload System (GCLAWS)

Title:	Name:	Phone:	Email:
Privacy Officer:	Susan Sokoll	202-461-7623	Susan.Sokoll@va.gov
Susan P. Sokoll	Digital Signature Block	Digitally signed by Susan P. Sokoll DN: c=US, o=U.S. Government, ou=Department of Veterans Affairs, ou=Internal Staff, 0.9.2342.19200300.100.1.1=Susan.Sokoll@va.gov, cn=Susan P. Sokoll Date: 2011.07.07 12:13:32 -04'00'	
Information Security Officer:	Keneath Coleman	202-461-5122	Keneath.Coleman@va,gov
Keneath A. Coleman	Digital Signature Block	Digitally signed by Keneath A. Coleman DN: c=US, o=U.S. Government, ou=Department of Veterans Affairs, ou=Internal Staff, 0.9.2342.19200300.100.1.1=Keneath.Coleman@va.gov, cn=Keneath A. Coleman Date: 2011.07.07 12:03:59 -04'00'	
System Owner/ Chief Information Officer:	Horace Blackman	(202) 461-7457	Horace.Blackman@va.gov
	Digital Signature Block		
Information Owner:	Will A. Gunn	202-461-4995	Will.Gunn@va.gov
	Digital Signature Block		
Other Titles:	General Counsel	0	0
	Digital Signature Block		

Date of Report: 1/0/00

OMB Unique Project Identifier 0

Project Name General Counsel Legal Automation Workload System (GCLAWS)