

Privacy Impact Assessment - 2009 (Form) / Financial & Logistics Integrated Technology Enterprise (FLITE)-2009 (Item)

Part I. Project Identification and Determination of PIA Requirement

1. PROJECT IDENTIFICATION:

1.1) Project Basic Information:

1.1.a) Project or Application Name:

Financial & Logistics Integrated Technology Enterprise (FLITE)-2009

1.1.b) OMB Unique Project Identifier:

029-00-01-01-01-1051-00

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 Financial and Logistics Integrated Management System (FLITE) is being developed to address the Department's long standing major Federal Financial Management Integrity Act (FFMIA) material weakness, Lack of an Integrated Financial Management System (LIFMS). The objectives of FLITE are: To effectively integrate and standardize financial/logistical data and processes across all VA offices. To provide management with access to timely and accurate financial, logistics, budget, asset and related information on VA-wide operations as well as on specific programs and projects. To establish an advanced technology environment which provides the greatest capability and an extended life cycle.

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.

FLITE consists of two major components. The Strategic Assets Management System (SAM) and the Integrated Financial Accounting System (IFAS). The SAM component has completed its PIA, which is presented here. IFAS is still in the very early stages of planning. As such, the IFAS component will be integrated into the FLITE PIA as IFAS progresses into later stages of the SDLC.

1.2) Contact Information:

1.2.a) Person completing this document:	
Title:	Arokiaswamy Pushparajan
Organization:	
Telephone Number:	(202) 273-7503
Email Address:	Arokiaswamy.Pushparajan@va.gov
1.2.b) Project Manager:	
Title:	Arokiaswamy Pushparajan
Organization:	
Telephone Number:	(202) 273-7503
Email Address:	Arokiaswamy.Pushparajan@va.gov
1.2.c) Staff Contact Person:	

Title:	Arokiaswamy Pushparajan
Organization:	
Telephone Number:	(202) 273-7503
Email Address:	Arokiaswamy.Pushparajan@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.)

FLITE consists of two major components. The Strategic Assets Management System (SAM) and the Integrated Financial Accounting System (IFAS). The SAM component has completed its PIA, which is presented here. IFAS is still in the very early stages of planning and not at the stage of development where a PIA is required.

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.

SAM will replace the Automated Equipment Management System/Medical Equipment Reporting System (AEMS/MERS) legacy system, that contains personally identifiable information on certain VA employees such as name, pay rate and craft or specialty information, for purposes of project management and tracking. SAM may include this personally identifiable employee information as well for these same purposes. SAM will also replace the Prosthetics Inventory Package (PIP) legacy system, that contains personally identifiable patient information on Veterans such as name and last four digits of social security number, for use in prosthetics inventory tracking. SAM may also include this personally identifiable patient information, including name and last four digits of social security number, for the same purpose. Also, SAM will interface with the Surgery legacy system, and will receive certain information from the Surgery legacy system in order to replace certain functioning of this system, such as the development of the requests or orders for surgical carts prior to surgery. Personally identifiable patient information, such as patient name associated with a specific request or order for a surgical cart, is currently within the Surgery legacy system, for use in the development of the requests or orders for surgical carts prior to surgery. Although SAM will take over this aspect of the Surgery legacy system, no reason can be found at this point as to why this personally identifying information is necessary for the purposes of SAM. Therefore, pending further review and a final determination on this issue, it is anticipated that such information will not be included. PII may be included within the IFAS component of the FLITE system.

3.b) What specific legal authorities authorize this project, and the associated collection, use, and/or retention of personal information?

Data collected under title 38 authority, including but not limited to sections 501(a), 527 and 7301.

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.
1,000,000 - 9,999,999
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.
(1) Design/Planning
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.
12/2008
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'.
No. At this early stage in the planning and design phase, it has not yet been determined that a unique identifier will or will not be used to retrieve records.
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.
4.b.1) For each applicable System of Records, list:
(1) The System of Records identifier (number),
(2) The name of the System of Records, and
(3) Provide the location where the specific applicable System of Records Notice(s) may be accessed (include the URL).
<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)?
4.b.3) Was the System(s) of Records created specifically for this project, or created for another project or system?
If created for another project or system, briefly identify the other project or system.
4.b.4) Does the System of Records Notice require modification?
If "No" then skip to section 5, 'Data Collection'.
4.b.5) Describe the required modifications.
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.

Explanation:

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

PIA SECTION 5

Project Name

Financial & Logistics Integrated Technology Enterprise (FLITE)-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.)
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Specifically identify the personal information collected, and describe the intended use of the information.

SAM may contain personally identifiable patient information on Veterans such as name, and last four digits of the social security number, for prosthetics inventory tracking purposes. SAM may also contain personally identifiable patient information regarding patients who have, or are about to undergo, surgical procedures, including patient name and association with specific surgical cart, for purposes of developing the requests or orders for surgical carts prior to surgery, because this information was found in the legacy Surgery system for the same purpose. However, no reason can be found at this time for including this information within the SAM system, so, pending further review and a final determination on this issue, it is anticipated that such information will not be included within SAM.

No	Other Personal Information of the Veteran or Primary Subject
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Specifically identify the personal information collected, and describe the intended use of the information.

No	Dependent Information
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Specifically identify the personal information collected, and describe the intended use of the information.

No	Service Information
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Specifically identify the personal information collected, and describe the intended use of the information.

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

SAM may contain personally identifiable patient information on Veterans such as name, and last four digits of the social security number, for prosthetics inventory tracking purposes. SAM may also contain personally identifiable patient information regarding patients who have, or are about to undergo, surgical procedures, including patient name and association with specific surgical cart, for purposes of developing the requests or orders for surgical carts prior to surgery, because this information was found in the legacy Surgery system for the same purpose. However, no reason can be found at this time for including this information within the SAM system, so, pending further review and a final determination on this issue, it is anticipated that such information will not be included within SAM.

No	Criminal Record Information
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Specifically identify the personal information collected, and describe the intended use of the information.

No	Guardian Information
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Specifically identify the personal information collected, and describe the intended use of the information.

No	Education Information
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Specifically identify the personal information collected, and describe the intended use of the information.

No	Rehabilitation Information
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Specifically identify the personal information collected, and describe the intended use of the information.

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.

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.

No

Veteran Source

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

No

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.

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.

Veteran patient information will be imported into the SAM system from the Computerized Patient Records System, which is an application within the larger Veterans Health Information Systems and Technology Architecture (VistA) Records system, for the purposes described in Section 5.1b above. VA employee information as described in Section 3.a above will be imported into the SAM system from the Personnel and Accounting Pay System, for purposes of project management and tracking.

No	Other Federal Agency Source(s)
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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.

No	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.

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.

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.

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.

No	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.")

No	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.

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.)

Veteran patient information will be imported into the SAM system from the Computerized Patient Records System, which is an application within the larger Veterans Health Information Systems and Technology Architecture (VistA) Records system, for the purposes described in Section 5.1b above. VA employee information, as described in Section 3.a above, will be imported into the SAM system from the Personnel and Accounting Pay System, for purposes of project management and tracking.

No	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.

No	Telephone Contact:	Information is collected via telephone.
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Describe the process through which information is collected via telephone contacts.

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.

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?

No

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

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

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?

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

	Not applicable
	Privacy notice is provided on each page of the application.
	A link to the VA Website Privacy Policy is provided.
	Proximity and Timing: the notice is provided at the time and point of data collection.
	Purpose: notice describes the principal purpose(s) for which the information will be used.
	Authority: notice specifies the legal authority that allows the information to be collected.
	Conditions: notice specifies if providing information is voluntary, and effects, if any, of not providing it.
	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:

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.

No	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.

No	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.

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?

No	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?

No	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.

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."

No

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

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.

	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.

	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.

	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.

	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.

	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.

	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.

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:

This will occur through the local systems that supply information to SAM.

5.6.b) How is data checked for completeness?

This will occur through the local systems that supply information to SAM.

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

This will occur through the local systems that supply information to SAM. Changes made through the local systems will be updated in SAM when synchronization with these other systems occurs.

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

This will occur through the local systems that supply information to SAM. Changes made through the local systems will be updated in SAM when synchronization with these other systems occurs.

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

PIA SECTIONS 6 - 13

Project Name

Financial & Logistics Integrated Technology Enterprise (FLITE)-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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Yes	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.

Certain contractors to VA will have access to SAM only as necessary for their job duties. However, access will be limited to programmatic functions and contractors will not have access to PII within the system at this point in the in early stages of the SDLC. If additional contractor support is later acquired and has access to PII, then contract identification will be supplied.

No	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.

No	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.

No	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.

No	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.

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.

No	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.

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:

Clinical and administrative staff involved in logistics operations.

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

On a need to know basis.

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

Yes - VA Directive 6502 and VA Handbook 6502 series

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

User access will be restricted.

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)

Security awareness and training for all SAM users and administrators will be provided by the VA Office of Cyber and Information Security (OCIS) Security Awareness and Training program that all VA employees and contractors are required to attend. Additionally, SAM administrators and users with security roles and responsibilities will be provided with the appropriate information-security role-based training.

SAM has been designated as a Federal Information Processing Standard (FIPS) 199 potential high impact system, which has led to the identification of the appropriate security controls and they will be implemented when the system is implemented, including but not limited to limiting views in the database, role based access levels and auditing.

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)

No

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.

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

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

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.

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

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

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.
No	The application will provide a phone number of a VA representative who will provide instructions.
No	The application will use other method (explain below).
Yes	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?
N/A
6.2.c) What are the procedures for correcting erroneous information?
N/A
6.2.d) If no redress is provided, are alternatives available?
N/A
6.2.e) Provide here any additional explanation; if exempt, explain why the application is exempt from providing access and amendment.
Direct access into SAM will not be allowed. Access to records and requests for corrections will occur through the local systems that supply information to SAM or MyHealthVet. Changes made through the local systems or My HealthVet will be updated in SAM when synchronization with these other systems occurs.
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

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.

Not determined yet. SAM is still being developed. Will be in accordance with VA Directive 6300 and VA Handbook 6300.1, and will eventually be scheduled with the National Archives and Records Administration.

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

Not determined yet. SAM is still being developed. Will be in accordance with VA Directive 6300 and VA Handbook 6300.1.

7.c) Where are procedures documented?

Not documented yet. SAM is still being developed.

7.d) How are data retention procedures enforced?

Not documented yet. SAM is still being developed.

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

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.
No	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:

SAM has been designated as a FIPS 199 potential high impact system, so security monitoring, testing and evaluating must be conducted on a regular basis to ensure that they are working properly. This will be done in accordance with NIST 800-53 requirements for high impact systems.

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.

SAM has been defined as a major application, and as such, it will be located in the VA's Corporate Franchise Data Center (CFD). SAM will be supported by the network or support system, which, like SAM, is a high potential impact system, so it has security boundaries and security controls consistent with this designation. Many of the relevant security controls that are needed to support the SAM mission will be made available through the GSS, and will not be available as a provision of the SAM system. Additionally, the workstation environment that will be used to provide connectivity to SAM users to the system will be outside of the SAM application boundary, so the workstation environment will provide many of the controls at the user interface level, thus alleviating those controls from the responsibility of the SAM program itself.

Access control in the SAM environment will be provided at the GSS network level with a single sign on (SSO) to the network and the application. Users will be assigned privileges that specify the activities and functions that they will be allowed to perform within the application. Security Awareness and Training for SAM users and administrators will be

provided by the VA Office of Cyber and Information Security (OCIS) Security Awareness Training program that all VA employees and contractors are required to attend.

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

The system will be developed as a high impact system, so all of the NIST SP 800-53 requirements will be taken into account.

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)

First PIA

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.

A determination will be made regarding whether the personally identifiable patient information currently found within the Surgery legacy system will be necessary when SAM takes over the functions of the Surgery legacy system, and at this time it appears that that information is not necessary.

Also, significant efforts have been made concerning the general design of SAM in order to limit the amount of personally identifiable information that will be transferred into the system, because this information is for the most part not necessary for the purposes of SAM. So, at this point, the anticipated amount of personally identifiable information that will be transferred into SAM is very minimal.

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

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?

Yes

12.b) If yes, specify:

There may be PII information on the SAM system. The Department would be embarrassed should it be disclosed to the public that PII information had not been adequately protected.

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

<i>maintenance of this application.</i>
Yes
13.2) Project Manager/Owner Name and Date (mm/dd/yyyy)
Arokiaswamy Pushparajan, 09/25/2007
ADDITIONAL INFORMATION: (Provide any necessary clarifying information or additional explanation for this section.)