Privacy Impact Assessment for the VA IT System called:

WebEx

Contact Center Engineering, Solutions Delivery

Date PIA submitted for review:

07/17/2020

System Contacts:

<table>
<thead>
<tr>
<th>Name</th>
<th>E-mail</th>
<th>Phone Number</th>
</tr>
</thead>
<tbody>
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<td><a href="mailto:Rita.grewal@va.gov">Rita.grewal@va.gov</a></td>
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<td>Crystal White</td>
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</tr>
</tbody>
</table>
Abstract

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

Cisco Webex Meetings—Federal Risk and Authorization Management Program (FedRAMP) Authorized Cisco Webex Meetings (the “Service” or “Webex Meetings”) is a cloud-based web and video conferencing solution made available by Cisco to companies or persons (“Customers,” “you,” or “your”) who purchase it for use by their authorized users (each, a “user”). The Service enables global employees and virtual teams to collaborate in real time from anywhere, anytime, on any mobile device or video system as though they were working in the same room. Solutions include meetings, events, training, and support services.

Overview

The overview is the most important section of the PIA. A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA. The overview should contain the following elements:

- The IT system name and the name of the program office that owns the IT system.
- The business purpose of the program, IT system, or technology and how it relates to the program office and agency mission.
- The expected number of individuals whose information is stored in the system and a brief description of the typical client or affected individual.
- If your system is a regional GSS, VistA, or LAN, include a list of the hospitals/medical centers, or other regional offices that fall under your system. Additionally, what region is the system under?
- A general description of the information in the IT system.
- Any information sharing conducted by the IT system. A general description of the modules and subsystems, where relevant, and their functions.
- Whether the system is operated in more than one site, and if so, a description of how use of the system and PII is maintained consistently in all sites and if the same controls are used across sites.
- A citation of the legal authority to operate the IT system.
- Whether the completion of this PIA will result in circumstances that require changes to business processes.
- Whether the completion of this PIA could potentially result in technology changes.
- If the system is in the process of being modified and a SORN exists, will the SORN require amendment or revision and approval?
• Does the system use cloud technology? If so, Does the system have a FedRAMP provisional or agency authorization? If the system does use cloud technology, but does not have FedRAMP authorization, explain how the Cloud Service Provider (CSP) solution was assessed and what FedRAMP documents and processes were used for the assessment in order to comply with VA Handbook 6517.

• Does a contract with Cloud Service Provider, Contractors and VA customers establish who has ownership rights over data including PII?

• NIST 800-144 states, “Organizations are ultimately accountable for the security and privacy of data held by a cloud provider on their behalf.” Is this principle described in contracts with customers? Why or why not?

• What is the magnitude of harm if privacy related data is disclosed, intentionally or unintentionally? Would the reputation of the CSP or its customers (VA) be affected?

Cisco Webex Meetings is a FedRAMP Authorized collaboration platform that allows users to instantly connect in a way that is as personal as a face-to-face meeting. The meeting host has the option to record meetings and all users have the option to upload and preserve files shared during and outside of meetings, which may be discoverable in a legal matter. The meeting host should inform all meeting attendees prior to recording if the meeting host intends to record the meeting. If the meeting host opts not to preserve the meeting content, it disappears from the Webex Meetings platform immediately after the meeting concludes.

Audit Controls

Hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic PHI must be implemented. Cisco Webex Services is designed to encrypt data in transit and at rest based on risk analysis. Cisco restricts personnel that have access to and can perform activities on the system based on risk analysis and the security principle of least privilege. We also log and monitor activity, and take action for potential incidents.

Integrity: Mechanism to Authenticate Electronic Protected Health Information

Policies and procedures must be established to protect electronic PHI from improper alteration or destruction. Cisco WebEx Services’ end-to-end encryption helps to prevent data from being altered or destroyed in transit or at rest in an unauthorized manner. Cisco employees do not have access to the content or purpose of the data the customer is transmitting or storing under normal circumstances, as per the operational security deemed necessary for operating our offer.

Transmission Security

Integrity Controls, and Encryption Technical security measures must be implemented to guard against unauthorized access to electronic PHI that is being transmitted over an electronic communications network. Cisco WebEx Services uses Transport Layer Security (TLS) encryption in transit to prevent data from being improperly modified. TLS version is 1.2 or higher for FIPS compliance and implements NIST validated key exchange schemes (NIST 800-131A Rev 1 Section 5 and 6), and supports strong protocols (TLS 1.1, 1.2). Cisco also has measures in place to protect customer data against accidental or unlawful loss, destruction or alteration, and unauthorized disclosure or access. These measures include policies, procedures, and internal controls for Cisco personnel, equipment, and processes. We also enforce similar measures with our vendors and subcontractors.
Section 1. Characterization of the Information

The following questions are intended to define the scope of the information requested and collected as well as the reasons for its collection as part of the program, IT system, or technology being developed.

1.1 What information is collected, used, disseminated, created, or maintained in the system?

Identify and list all Sensitive Personal Information (SPI) that is collected and stored in the system, including Individually Identifiable Information (III), Individually Identifiable Health Information (IIHI), Protected Health Information (PHI), and Privacy-Protected Information. For additional information on these information types and definitions, please see VA Directives and Handbooks in the 6500 series (https://va.gov/vapubs/). If the system creates information (for example, a score, analysis, or report), list the information the system is responsible for creating.

If a requesting system receives information from another system, such as a response to a background check, describe what information is returned to the requesting system.
This question is related to privacy control AP-1, Authority To Collect, and AP-2, Purpose Specification.

Please check any information listed below that your system collects, uses, disseminates, creates, or maintains. If additional SPI is collected, used, disseminated, created, or maintained, please list those in the text box below:

- Name
- Social Security Number
- Date of Birth
- Mother’s Maiden Name
- Personal Mailing Address
- Personal Phone Number(s)
- Personal Fax Number
- Personal Email Address
- Emergency Contact Information (Name, Phone Number, etc. of a different individual)
- Financial Account Information
- Health Insurance Beneficiary Numbers
- Account numbers
- Certificate/License numbers
- Vehicle License Plate Number
- Internet Protocol (IP) Address Numbers
- Current Medications
- Previous Medical Records
- Race/Ethnicity
- Tax Identification Number
- Medical Record Number
- Other Unique Identifying Number (list below)

The data that we collect as part of Cisco Webex Services user registration—username, email address, phone number, is considered “real identity” and stored in the user’s profile in a Cisco Webex Services cloud component known as Common Identity. For each user, we also generate a random 128-bit universally unique identifier (UUID), which is the user’s obfuscated identity. Similarly, for
enterprises, we use a random 128-bit “organization ID” as the obfuscated identity of each enterprise. Cisco Webex Services provides client-side, end-to-end encryption of user-generated text messages, space names, files, and file names, both at rest and in motion. Cisco Webex Services also encrypts the transmission of data from client devices to the Cisco Webex Services cloud using Transport Layer Security (TLS). All media in Cisco Webex Services, such as voice, video, and desktop share, is transmitted using Secure Real-Time Transport Protocol (SRTP; defined in RFC 3711).

For Unique Identifying number MSA may use standard Call Center Script and ask the Veteran – “Thank you for calling the Department of Veterans Affairs (VA). My name is (MSA state your first name), may I please have the Veteran's last name and last four digits of the Veteran's social security number?” This is not collected or entered into the Webex database… but referenced against other credentialed systems such as Vista. Any chat or discussion had within Webex is transmitted with a Secure Real Time Protocol (sRTP) stream and is not stored within the Webex systems or databases.

PII Mapping of Components

WebEx consists of 3 key components. Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected by WebEx and the reasons for the collection of the PII are in the table below.

PII Mapped to Components

<table>
<thead>
<tr>
<th>Components of the information system (servers) collecting/storing PII</th>
<th>Does this system collect PII? (Yes/No)</th>
<th>Does this system store PII? (Yes/No)</th>
<th>Type of PII (SSN, DOB, etc.)</th>
<th>Reason for Collection/Storage of PII</th>
<th>Safeguards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration</td>
<td>Yes</td>
<td>Yes</td>
<td>Name</td>
<td>Enrollment</td>
<td>Stored Encrypted</td>
</tr>
<tr>
<td>Registration</td>
<td>Yes</td>
<td>Yes</td>
<td>E-mail</td>
<td>Enrollment</td>
<td>Stored Encrypted</td>
</tr>
<tr>
<td>Registration</td>
<td>Yes</td>
<td>Yes</td>
<td>Phone</td>
<td>Enrollment</td>
<td>Stored encrypted</td>
</tr>
<tr>
<td>Meeting in progress</td>
<td>Yes</td>
<td>Yes</td>
<td>Video or Audio</td>
<td>Real-time Conference</td>
<td>Encrypted</td>
</tr>
</tbody>
</table>

1.2 What are the sources of the information in the system?

List the individual, entity, or entities providing the specific information identified above. For example, is the information collected directly from the individual as part of an application for a benefit, or is it collected from other sources such as commercial data aggregators?
Describe why information from sources other than the individual is required. For example, if a program’s system is using data from a commercial aggregator of information or data taken from public Web sites, state the fact that this is where the information is coming from and then in question 1.3 indicate why the system is using this source of data.

If the system creates information (for example, a score, analysis, or report), list the system as a source of information.

This question is related to privacy controls DI-1, Data Quality, and IP-1, Consent.

· Single Sign-On (SSO) – Administrators can configure Cisco Webex Services to work with their existing SSO solutions. Cisco Webex Services supports identity providers using Security Assertion Markup Language (SAML) 2.0 and Open Authorization (OAuth) 2.0.

· Directory synchronization – Administrators can have employee lifecycle changes reflected in Cisco Webex Services in real-time when using Microsoft Active Directory.

1.3 How is the information collected?

This question is directed at the means of collection from the sources listed in question 1.2. Information may be collected directly from an individual, received via electronic transmission from another system, or created by the system itself. Specifically, is information collected through technologies or other technology used in the storage or transmission of information in identifiable form?

If the information is collected on a form and is subject to the Paperwork Reduction Act, give the form’s OMB control number and the agency form number.

This question is related to privacy controls DI-1, Data Quality, and IP-1, Consent.

User information is validated via SSO from the user at login, method details for collecting and validation is listed in section 1.2

1.4 What is the purpose of the information being collected, used, disseminated, created, or maintained?

Include a statement of why the particular SPI is collected, maintained, used, or disseminated in the system is necessary to the program’s or agency’s mission. Merely stating the general purpose of the system without explaining why this particular type of information should be collected and stored is not an adequate response to this question.

If the system collects, uses, disseminates, or maintains publicly available or commercial data, include a discussion of why commercial data is relevant and necessary to the system’s purpose.

This question is related to privacy control AP-2, Purpose Specification.
User Identity for meeting access. All media in Cisco Webex Services, such as voice, video, and desktop share, is transmitted using Secure Real-Time Transport Protocol (SRTP; defined in RFC 3711). See table from section 1.1

1.5 How will the information be checked for accuracy? How often will it be checked?

Discuss whether and how often information stored in the system is checked for accuracy. Is information in the system checked against any other source of information (within or outside your organization) before the information is used to make decisions about an individual? For example, is there a computer matching agreement in place with another government agency? For systems that receive data from internal data sources or VA IT systems, describe the system checks to ensure that data corruption has not occurred during transmission.

If the system checks for accuracy by accessing a commercial aggregator of information, describe this process and the levels of accuracy required by the contract.

This question is related to privacy controls DI-1, Data Quality, and DI-2, Data Integrity and Integrity Board.

Cisco Webex Services provides client-side, end-to-end encryption of user-generated text messages, space names, files, and file names, both at rest and in motion. Cisco Webex Services also encrypts the transmission of data from client devices to the Cisco Webex Services cloud using Transport Layer Security (TLS).

1.6 What specific legal authorities, arrangements, and agreements defined the collection of information?

List the full legal authority for operating the system, specifically the authority to collect the information listed in question 1.1. Provide the authorities in a manner understandable to any potential reader, i.e., do not simply provide a legal citation; use statute names or regulations in addition to citations. Legal authorities include Federal laws, regulations, statutes, and Executive Orders.

This question is related to privacy control AP-1, Authority to Collect

FedRAMP does this by standardizing a variety of security related issues for cloud products and services used by Federal agencies, including:
- Security Assessments
- Authorizations
- Continuous Monitoring

The Service is International Organization for Standardization (ISO) 270001, Statement on Standards for Attestation Engagements (SSAE) – 16, and Service Organization Control (SOC) 2 Type II certified and in accordance with those standards adopts technical and organizational security measures to protect your personal data from unauthorized access use or disclosure as required by law.
1.7 PRIVACY IMPACT ASSESSMENT: Characterization of the information
Consider the specific data elements collected and discuss the potential privacy risks and what steps, if any are currently being taken to mitigate those identified risks.

Consider the following Fair Information Practice Principles (FIPPs) when assessing the risk to individual privacy:

**Principle of Purpose Specification:** Explain how the collection ties with the purpose of the underlying mission of the organization and its enabling authority.

**Principle of Minimization:** Is the information directly relevant and necessary to accomplish the specific purposes of the program?

**Principle of Individual Participation:** Does the program, to the extent possible and practical, collect information directly from the individual?

**Principle of Data Quality and Integrity:** Are there policies and procedures for VA to ensure that personally identifiable information is accurate, complete, and current?
This question is related to privacy control AR-1, Governance and Privacy Program, and AR-2, Privacy Impact and Risk Assessment.

Follow the format below when entering your risk assessment:

**Privacy Risk:** Name, E-mail, Phone Number are collected to create an account on the Webex platform. Form Factor Authentication is required by VA and therefore the collection of PII is necessary for Authentication, Authorization, and Authorization. This information is entered the 1st time for account creation directly by the individual. Only that individual can see any of the information outside of the user's name appearing in the participants list during a conference.

**Mitigation:** Only the minimum required data is used, optional PII such as mailing address is not required.

**Section 2. Uses of the Information**

The following questions are intended to clearly delineate the use of information and the accuracy of the data being used.

2.1 Describe how the information in the system will be used in support of the program’s business purpose.

*Identify and list each use (both internal and external to VA) of the information collected or maintained.*
*This question is related to privacy control AP-2, Purpose Specification.*
User Identity for meeting access. All media in Cisco Webex Services, such as voice, video, and desktop share, is transmitted using Secure Real-Time Transport Protocol (SRTP; defined in RFC 3711).

2.2 What types of tools are used to analyze data and what type of data may be produced?

Many systems sift through large amounts of information in response to a user inquiry or programmed functions. Systems may help identify areas that were previously not obvious and need additional research by agents, analysts, or other employees. Some systems perform complex analytical tasks resulting in, among other types of data, matching, relational analysis, scoring, reporting, or pattern analysis. Describe any type of analysis the system conducts and the data that is created from the analysis.

If the system creates or makes available new or previously unutilized information about an individual, explain what will be done with the newly derived information. Will it be placed in the individual’s existing record? Will a new record be created? Will any action be taken against or for the individual identified because of the newly derived data? If a new record is created, will the newly created information be accessible to Government employees who make determinations about the individual? If so, explain fully under which circumstances and by whom that information will be used.

This question is related to privacy controls DI-1, Data Quality, DI-2, Data Integrity and Integrity Board, and SE-1, Inventory of Personally Identifiable Information

Evaluation Periodic technical and nontechnical performance evaluations must be conducted in response to environmental or operational changes affecting the security of electronic PHI. Independent internal audits, external audits, security assessments, and risk assessments are performed for Cisco Webex Services. The results provide identification of risks, risk treatments, and remediation as appropriate to address any potential risks.

2.3 PRIVACY IMPACT ASSESSMENT: Use of the information. How is access to the PII determined? Are criteria, procedures, controls, and responsibilities regarding access documented? Does access require manager approval? Is access to the PII being monitored, tracked, or recorded? Who is responsible for assuring safeguards for the PII?

Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above. Example: Describe if training for users of the project covers how to appropriately use information. Describe the disciplinary programs or system controls (i.e. denial of access) that are in place if an individual is inappropriately using the information.

Consider the following FIPPs below to assist in providing a response:

**Principle of Transparency:** Is the PIA and SORN, if applicable, clear about the uses of the information?

**Principle of Use Limitation:** Is the use of information contained in the system relevant to the mission of the project?
Add answer here:

Access to PII is not granted. Participants on a conference will be able to see a participant list which will contain the name of the Host. The participants can choose to enter their full name or abbreviate. No Access to Login information is granted.

Section 3. Retention of Information

The following questions are intended to outline how long information will be retained after the initial collection.

3.1 What information is retained?

Identify and list all information collected from question 1.1 that is retained by the system.

This question is related to privacy controls DM-1, Minimization of Personally Identifiable Information, and DM-2, Data Retention and Disposal

Name, E-mail, Phone Number

3.2 How long is information retained?

In some cases VA may choose to retain files in active status and archive them after a certain period of time. State active file retention periods, as well as archived records, in number of years, for the information and record types. For example, financial data held within your system may have a different retention period than medical records or education records held within your system, please be sure to list each of these retention periods.

The VA records officer should be consulted early in the development process to ensure that appropriate retention and destruction schedules are implemented.

This question is related to privacy control DM-2, Data Retention and Disposal.

Name, E-mail, and Phone Number are retained for 7 years from when service is terminated.

3.3 Has the retention schedule been approved by the VA records office and the National Archives and Records Administration (NARA)? If so please indicate the name of the records retention schedule.

An approved records schedule must be obtained for any IT system that allows the retrieval of a record via a personal identifier. The VA records officer will assist in providing a proposed schedule.
The schedule must be formally offered to NARA for official approval. Once NARA approves the proposed schedule, the VA records officer will notify the system owner.

This question is related to privacy control DM-2, Data Retention and Disposal.

Webex is not a system of record.

3.4 What are the procedures for the elimination of SPI?

Explain how records are destroyed or eliminated at the end of the retention period. Please give the details of the process. For example, are paper records shredded on site, or by a shredding company and accompanied by a certificate of destruction, etc?

This question is related to privacy control DM-2, Data Retention and Disposal

Subject only to VA’s retention policies, users with an active subscription have complete control over how long their User-Generated Information (e.g., recordings and files they initiate or upload) is stored on the Webex Meetings platform and can delete such User-Generated Information from their account through the My Webex Page at any time during the term of their subscription. Enterprise Customers have the ability to set organization-wide retention periods for recordings using APIs. After the Service is terminated or expires, User-Generated Information is deleted from the Webex Meetings platform within 60 days.

3.5 Does the system, where feasible, use techniques to minimize the risk to privacy by using PII for research, testing, or training?

Organizations often use PII for testing new applications or information systems prior to deployment. Organizations also use PII for research purposes and for training. These uses of PII increase the risks associated with the unauthorized disclosure or misuse of the information. Please explain what controls have been implemented to protect PII used for testing, training and research. Have policies and procedures been developed to minimize the use of PII for testing, training, and research?

This question is related to privacy control DM-3, Minimization of PII Used in Testing, Training and Research

The Cisco Webex Services cloud security team has established formal policies, standards, and procedures relevant to the design and operations of controls over Cisco Webex Services. Policies are reviewed and approved periodically, published on the Cisco company intranet, and shared with Cisco Webex Services employees and contractors. Cisco Webex Services management has an independent group within the Cisco Security & Trust Organization that performs periodic risk assessments. Activities, remediation, and initiatives are monitored and reported to management. The Data Protection & Privacy team within Cisco’s Security & Trust Organization coordinates the Data Incident Response Process and manages the enterprise-wide response to data-centric incidents. The team works with Customers, independent security researchers, consultants, industry organizations, and other vendors to identify possible security issues with Cisco products and networks. The Cisco Security Center details the process for reporting security incidents. The Cisco Notification Service allows Customers to subscribe and receive important Cisco product and technology information, including Cisco security advisories for critical and high severity security vulnerability.
3.6 PRIVACY IMPACT ASSESSMENT: Retention of information

Discuss the risks associated with the length of time data is retained and what steps, if any, are currently being taken to mitigate those identified risks.

While we understand that establishing retention periods for records is a formal process, there are policy considerations behind how long a project keeps information. The longer a project retains information, the longer it needs to secure the information and assure its accuracy and integrity. The proposed schedule should match the requirements of the Privacy Act to keep the minimum amount of PII for the minimum amount of time, while meeting the Federal Records Act. The schedule should align with the stated purpose and mission of the system.

Consider the following FIPPs below to assist in providing a response:

**Principle of Minimization:** Does the project retain only the information necessary for its purpose? Is the PII retained only for as long as necessary and relevant to fulfill the specified purposes?

**Principle of Data Quality and Integrity:** Has the PIA described policies and procedures for how PII that is no longer relevant and necessary is purged? This question is related to privacy controls DM-1, Minimization of Personally Identifiable Information, and DM-2, Data Retention and Disposal.

Follow the format below:

**Privacy Risk:** As the length of time that PII is retained increases, the probability of the risk event occurring increases. “Name, E-mail, and Phone Number are retained for 7 years. This data is required for login/account creation purposes and is used to meet VA requirements for 2 Form Factor Authentication.

**Mitigation:** WebEx has met all requirements to obtain a FEDRAMP Moderate certification. NIST Security controls are implemented to ensure the data is protected. Cisco Webex Services management has an independent group within the Cisco Security & Trust Organization that performs periodic risk assessments. Activities, remediation, and initiatives are monitored and reported to management. The Data Protection & Privacy team within Cisco’s Security & Trust Organization coordinates the Data Incident Response Process and manages the enterprise-wide response to data-centric incidents.

Section 4. Internal Sharing/Receiving/Transmitting and Disclosure

The following questions are intended to define the scope of information sharing/receiving/transmitting within VA. NOTE: Question 5 on Privacy Threshold Analysis should be used to answer this question.

4.1 With which internal organizations is information shared/received/transmitted? What information is shared/received/transmitted, and for what purpose? How is the information transmitted?
Identify and list the names of any program offices, contractor-supported IT systems, and any other organization or IT system within VA with which information is shared.

State the purpose for the internal sharing. If you have specific authority to share the information, provide a citation to the authority.

For each interface with a system outside your program office, state what specific data elements (PII/PHI) are shared with the specific program office, contractor-supported IT system, and any other organization or IT system within VA.

Describe how the information is transmitted. For example, is the information transmitted electronically, by paper, or by some other means? Is the information shared in bulk, on a case-by-case basis, or does the sharing partner have direct access to the information? This question is related to privacy controls AP-2, Purpose Specification, AR-3, Privacy Requirements for Contractors and Service Providers, AR-8, Accounting of Disclosures, TR-1, Privacy Notice, and UL-1, Internal Use.

### Data Shared with Internal Organizations

<table>
<thead>
<tr>
<th>List the Program Office or IT System information is shared/received with</th>
<th>List the purpose of the information being shared/received with the specified program office or IT system</th>
<th>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT system</th>
<th>Describe the method of transmittal</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Discuss the privacy risks associated with the sharing of information within the Department and what steps, if any, are currently being taken to mitigate those identified risks. This question is related to privacy control UL-1, Internal Use.
Follow the format below:

**Privacy Risk:** N/A

**Mitigation:**

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**Section 5. External Sharing/Receiving and Disclosure**

The following questions are intended to define the content, scope, and authority for information sharing external to VA, which includes Federal, State, and local governments, and the private sector.

5.1 With which external organizations (outside VA) is information shared/received? What information is shared/received, and for what purpose? How is the information transmitted and what measures are taken to ensure it is secure?

Is the sharing of information outside the agency compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If not, please describe under what legal mechanism the IT system is allowed to share the information in identifiable form or personally identifiable information outside of VA.

**Note:** This question is #7 in the Privacy Threshold Analysis.

Identify and list the names of any Federal, State, or local government agency or private sector organization with which information is shared.

For each interface with a system outside VA, state what specific data elements (PII/PHI) are shared with each specific partner.

What legal mechanisms, authoritative agreements, documentation, or policies are in place detailing the extent of the sharing and the duties of each party? For example, is the sharing of data compatible with your SORN? Then list the SORN and the applicable routine use from the SORN. Is there a Memorandum of Understanding (MOU), Computer Matching Agreement (CMA), or law that mandates the sharing of this information?

Describe how the information is transmitted to entities external to VA and what security measures have been taken to protect it during transmission.

This question is related to privacy control UL-2, Information Sharing with Third Parties.
### Data Shared with External Organizations

<table>
<thead>
<tr>
<th>List External Program Office or IT System information is shared/received with</th>
<th>List the purpose of information being shared / received / transmitted with the specified program office or IT system</th>
<th>List the specific data element types such as PII/PHI that are shared/received with the Program or IT system</th>
<th>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</th>
<th>List the method of transmission and the measures in place to secure data</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If specific measures have been taken to meet the requirements of OMB Memoranda M-06-15 and M-06-16, note them here.

N/A

5.2 PRIVACY IMPACT ASSESSMENT: External sharing and disclosure

Discuss the privacy risks associated with the sharing of information outside the Department and what steps, if any, are currently being taken to mitigate those identified risks.

Discuss whether access controls have been implemented and whether audit logs are regularly reviewed to ensure appropriate sharing outside of the Department. For example, is there a Memorandum Of Understanding (MOU), contract, or agreement in place with outside agencies or foreign governments.

Discuss how the sharing of information outside of the Department is compatible with the stated purpose and use of the original collection.

This question is related to privacy control AR-2, Privacy Impact and Risk Assessment, AR-3, Privacy Requirements for Contractors and Service Providers, and AR-4, Privacy Monitoring and Auditing.

Follow the format below:

**Privacy Risk:** N/A

**Mitigation:**
Section 6. Notice

The following questions are directed at providing notice to the individual of the scope of information collected, the right to consent to uses of the information, and the right to decline to provide information.

6.1 Was notice provided to the individual before collection of the information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on forms, or a system of records notice published in the Federal Register.) If notice was not provided, why not?

This question is directed at the notice provided before collection of the information. This refers to whether the person is aware that his or her information is going to be collected. A notice may include a posted privacy policy, a Privacy Act statement on forms, or a SORN published in the Federal Register. If notice was provided in the Federal Register, provide the citation.

If notice was not provided, explain why. If it was provided, attach a copy of the current notice.

Describe how the notice provided for the collection of information is adequate to inform those affected by the system that their information has been collected and is being used appropriately. Provide information on any notice provided on forms or on Web sites associated with the collection. This question is related to privacy control TR-1, Privacy Notice, and TR-2, System of Records Notices and Privacy Act Statements, and TR-3, Dissemination of Privacy Program Information.

Users access to the system is optional within the VA so there will be no advanced notice related to the collection of PII. If a user decides to create an account the user will be asked to enter in their name, e-mail, and phone number. It’s at the point of account creation a user can decide to continue with the account creation process.

6.2 Do individuals have the opportunity and right to decline to provide information? If so, is a penalty or denial of service attached?

This question is directed at whether the person from or about whom information is collected can decline to provide the information and if so, whether a penalty or denial of service is attached. This question is related to privacy control IP-1, Consent, IP-2, Individual Access, and IP-3, Redress

Use of the Webex service is optional within the VA and individuals may decline to provide information.

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

This question is directed at whether an individual may provide consent for specific uses or the consent is given to cover all uses (current or potential) of his or her information. If specific consent is required, how would the individual consent to each use?
This question is related to privacy control IP-1, Consent

Use of the Webex service is optional within the VA and individuals may decline to provide information. An individual may be a participant within a hosted call and do not have to enter any PII.

6.4 PRIVACY IMPACT ASSESSMENT: Notice
Describe the potential risks associated with potentially insufficient notice and what steps, if any, are currently being taken to mitigate those identified risks.

Consider the following FIPPs below to assist in providing a response:

Principle of Transparency: Has sufficient notice been provided to the individual?

Principle of Use Limitation: Is the information used only for the purpose for which notice was provided either directly to the individual or through a public notice? What procedures are in place to ensure that information is used only for the purpose articulated in the notice?

This question is related to privacy control TR-1, Privacy Notice, AR-2, Privacy Impact and Risk Assessment, and UL-1, Internal Use

Follow the format below:
Privacy Risk: Risk that individual is unaware that their information is being collected by the system.

Mitigation: Use of the Webex service is optional within the VA and individuals may decline to provide information.

Section 7. Access, Redress, and Correction

The following questions are directed at an individual’s ability to ensure the accuracy of the information collected about him or her.

7.1 What are the procedures that allow individuals to gain access to their information?

Cite any procedures or regulations your program has in place that allow access to information. These procedures, at a minimum, should include the agency’s FOIA/Privacy Act practices, but may also include additional access provisions. For example, if your program has a customer satisfaction unit, that information, along with phone and email contact information, should be listed in this section in addition to the agency’s procedures. See 5 CFR 294 and the VA FOIA Web page at http://www.foia.va.gov/ to obtain information about FOIA points of contact and information about agency FOIA processes.

If the system is exempt from the access provisions of the Privacy Act, please explain the basis for the exemption or cite the source where this explanation may be found, for example, a Final Rule published in the Code of Federal Regulations (CFR).
If the system is not a Privacy Act system, please explain what procedures and regulations are in place that covers an individual gaining access to his or her information. This question is related to privacy control IP-2, Individual Access, and AR-8, Accounting of Disclosures.

Use of the Webex service is optional within the VA. If an individual decides to use the system, they will be provided the authorized URL approved and located within the Technical Reference Model (TRM) system. Once the account is created an individual may access their information by following the link and logging into the application. Once authenticated and authorized access the individual may go to account preferences and view their Name, E-mail, and Phone Number.

7.2 What are the procedures for correcting inaccurate or erroneous information?

Describe the procedures and provide contact information for the appropriate person to whom such issues should be addressed. If the correction procedures are the same as those given in question 7.1, state as much. This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.

The only information that can be incorrect is phone number, Name and E-mail is required to be accurate for account deletion and 2 Form Factor Login. Once authenticated and authorized access the individual may go to account preferences and view their Name, E-mail, and Phone Number. The Phone number is an editable field.

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

How are individuals made aware of the procedures for correcting his or her information? This may be through notice at collection or other similar means. This question is meant to address the risk that even if procedures exist to correct information, if an individual is not made fully aware of the existence of those procedures, then the benefits of the procedures are significantly weakened. This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.

A usage document is created and available for download. https://dvagov.sharepoint.com/sites/OITUCIS/webex/SitePages/WebEx.aspx

7.4 If no formal redress is provided, what alternatives are available to the individual?

Redress is the process by which an individual gains access to his or her records and seeks corrections or amendments to those records. Redress may be provided through the Privacy Act and Freedom of Information Act (FOIA), and also by other processes specific to a program, system, or group of systems. This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.
Example: Some projects allow users to directly access and correct/update their information online. This helps ensures data accuracy.

N/A

7.5 PRIVACY IMPACT ASSESSMENT: Access, redress, and correction
Discuss what risks there currently are related to the Department’s access, redress, and correction policies and procedures for this system and what, if any, steps have been taken to mitigate those risks. For example, if a project does not allow individual access, the risk of inaccurate data needs to be discussed in light of the purpose of the project. For example, providing access to ongoing law enforcement activities could negatively impact the program’s effectiveness because the individuals involved might change their behavior.

Consider the following FIPPs below to assist in providing a response:
Principle of Individual Participation: Is the individual provided with the ability to find out whether a project maintains a record relating to him?

Principle of Individual Participation: If access and/or correction is denied, then is the individual provided notice as to why the denial was made and how to challenge such a denial?

Principle of Individual Participation: Is there a mechanism by which an individual is able to prevent information about him obtained for one purpose from being used for other purposes without his knowledge?
This question is related to privacy control IP-3, Redress.

Follow the format below:
Privacy Risk: N/A

Mitigation:

Section 8. Technical Access and Security
The following questions are intended to describe technical safeguards and security measures.

8.1 What procedures are in place to determine which users may access the system, and are they documented?

Describe the process by which an individual receives access to the system.

Identify users from other agencies who may have access to the system and under what roles these individuals have access to the system. Who establishes the criteria for what PII can be shared?
Describe the different roles in general terms that have been created to provide access to the system. For example, certain users may have "read-only" access while others may be permitted to make certain amendments or changes to the information.

This question is related to privacy control AR-7, Privacy-Enhanced System Design and Development.

Only VA employee may access the system. All VA users have the ability to create an account on the Webex managed service platform. If you do not have a VA Lightweight Directory Access Protocol (LDAP) account you will not be able to create an account on the Webex manager service platform. User access is documented and maintained through LDAP and Active Directory Federation Services (ADFS) logins and follow LDAP security policy for authentication and logging events. Once a user clears the VA and the LDAP account is deleted, the account on the Webex platform will automatically be deleted from the managed service platform. There will not be any elevated privilege to the system granted to VA employees.

8.2 Will VA contractors have access to the system and the PII? If yes, what involvement will contractors have with the design and maintenance of the system? Has a contractor confidentiality agreement or a Non-Disclosure Agreement (NDA) been developed for contractors who work on the system?

If so, how frequently are contracts reviewed and by whom? Describe the necessity of the access provided to contractors to the system and whether clearance is required. If Privacy Roles and Responsibilities have been established to restrict certain users to different access levels, please describe the roles and associated access levels. Explain the need for VA contractors to have access to the PII.

This question is related to privacy control AR-3, Privacy Requirements for Contractors and Service Providers.

VA Contractors will not be given access to “Host” meetings from the VA provided Webex solution.

Contractors will be able to participate in meetings and will only be able to see the current participant list which only includes the name of the participant.

8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?

VA offers privacy and security training. Each program or system may offer training specific to the program or system that touches on information handling procedures and sensitivity of information. Please describe how individuals who have access to PII are trained to handle it appropriately.

This question is related to privacy control AR-5, Privacy Awareness and Training.

VA annual privacy and security training
8.4 Has Authorization and Accreditation (A&A) been completed for the system?

If Yes, provide:

1. The date the Authority to Operate (ATO) was granted,
2. Whether it was a full ATO or ATO with Conditions,
3. The amount of time the ATO was granted for, and
4. The FIPS 199 classification of the system (LOW/MODERATE/HIGH).

Please note that all systems containing SPI are categorized at a minimum level of “moderate” under Federal Information Processing Standards Publication 199.

If No or In Process, provide your Initial Operating Capability (IOC) date.

Yes

1. The date the Authority to Operate (ATO) was granted, April 10, 2020
2. Whether it was a full ATO or ATO with Conditions, - Full
3. The amount of time the ATO was granted – 3 Year
4. The FIPS 199 classification of the system - Moderate
### Section 9. References

**Summary of Privacy Controls by Family**

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APPENDIX A-6.1

Please provide a link to the notice or verbiage referred to in Section 6 (a notice may include a posted privacy policy, a Privacy Act notice on forms).
Signature of Responsible Officials

The individuals below attest that the information provided in this Privacy Impact Assessment is true and accurate.

RITA K GREWAL
114938
Digitally signed by RITA K GREWAL 114938
Date: 2020.08.20 15:53:12 -04'00'

PO, Rita Grewal

CRYSTAL L. WHITE 134339
Digitally signed by CRYSTAL L. WHITE 134339
Date: 2020.08.21 13:25:51 -04'00'

Information Security Systems Officer, Crystal White

Terrill N. Harrison 1079525
Digitally signed by Terrill N. Harrison 1079525
Date: 2020.08.21 13:10:31 -04'00'

System Owner, Terrill Harrison