



Privacy Impact Assessment for the VA IT System called:

Permanent Change of Station (PCS) System

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System Contacts:

System Contacts

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Abstract

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

Permanent Change of Station (PCS) Relocation processing; The system creates and houses all relocation documents from PCS orders to reimbursements which are processed to make payments to VA employees for costs incurred during relocations. The Financial Services Center processes such payments for all VA employees who receive relocation funding.

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?*

Permanent Change of Station (PCS): Corporate Travel and Charge Card Service (CTCCS) includes the PCS Relocation program and the Finance Services Center (FSC) houses the PCS Relocation Office. The purpose of this system is to automate the VA’s Permanent relocation program and contain all supporting documents including the 3918 Intra Agency Transfer Request form for both funded and unfunded relocations, SF 1038 (Advance), VA Form 3036d Travel Authority, discretionary items requests, and payment vouchers for reimbursements for funded relocations.

The PCS Travel Portal contains pertinent information to facilitate the relocation such as the employees name, full physical address to include state and zip code, social security number, phone number, email address, and declared dependents. The system stores financial account information of employees in the system that is further explained in section 1.1. PCS system adheres to information security requirements instituted by the VA Office of Information Technology (OIT) to protect the sensitive data. The contracted companies used by VA all have a Memorandum of Understanding (MOU) or contract signed through the VA Contracting Office. The companies do not access this VA system. The system will be sharing information internally, as discussed in section 4, and externally, as discussed in question 5. The legal authority we follow is the Budget and Accounting Act of 1950, General Accounting Office Title 8, Chapter 3. The completion of the PIA will not result in any business or technology changes. The system does not use cloud technology.

There is a total of 79,4622 VA users in the system. The users are all current or former VA employees who receive relocation benefits. Profiles are created for relocating employees when 3918 forms are initiated by the receiving station Human Resource Specialist. The employee will receive an e-mail notification with their user name and instructions on how to create a new password. User profiles are never deleted from the system; however, access will be revoked if the user does not login for 60 days. This is a standalone system located at the FSC. The sharing of information is covered in SORN 13VA047, Individuals Submitting Invoices-Vouchers for Payment-VA.

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://vaww.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:

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

Also collected are: Business email, business phone number, and HR Smart Employee ID Code

PII Mapping of Components

Permanent Change of Station (PCS) consists of 1 key component. Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected by Permanent Change of Station (PCS) and the functions that collect it are mapped below.

PII Mapped to Components

PII Mapped to Components

Components of the information system (servers) collecting/storing PII	Does this system collect PII? (Yes/No)	Does this system store PII? (Yes/No)	Type of PII (SSN, DOB, etc.)	Reason for Collection/ Storage of PII	Safeguards
PCS Portal Database	Yes	Yes	SSN DOB	Provide PCS relocation services	PII Masked & Encrypted role based access separation of duties

					Dynatrace Monitoring
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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.

The information provided above is provided by the Human Resource Specialists at the relocating employee's gaining station. It is required that the HR Specialist (Station) provide the information because the form that is populated with this information is an HR form. The information is gathered from the HR Smart system and other applicable agency HR systems. The HR representative from OIG, VHA, VBA, NCA, and other VA Staff Offices manually input the information into the PCS Travel Portal by the approved HR representative. The relocating employee then verifies the information as correct.

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.

The information is collected electronically in the system. The HR Specialist logs into the PCS system with a user name and password and enters the requested SPI data.

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.

The purpose of the information is to ensure the correct individuals are receiving the PCS entitlements. Also, the authorized relocation entitlements in accordance with the Federal Travel Regulations affect the relocating employee's income, so we must ensure we apply it to their payroll records.

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.

The relocating employee has access to view their Sensitive Personal Information (SPI) data identified in item #1.1 above. The FSC asks the relocating employee to validate the information prior to initiating a travel authority.

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

Budget and Accounting Act of 1950, General Accounting Office Title 8, Chapter 3. Because entitlements are considered income, reimbursements are recorded on the relocating employee's W-2 form.

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: Sensitive Personal Information may be released to unauthorized individuals.

Mitigation:

- PCS system adheres to information security requirements instituted by the VA Office of Information Technology (OIT).
- PCS system relies on information previously collected by the VA from the individuals.
- Both contractor and VA employees are required to take Privacy, HIPAA, and information security training annually.
- File access granted only to those with a valid need to know.
- Only internal VA employees can access PCS system

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.

Relocation payment processing; Reimbursement data is processed to make payments to VA employees for costs incurred during relocations. The FSC processes payments for all VA employees.

Name: Used as an identifier

Social Security Number: Used as an identifier

Date of Birth: Used as an identifier

HR Smart Employee ID: Used as an identifier

Mailing Address: Used to contact the individual/Used for entitlement verification

Zip Code: Used to contact the individual/Used for entitlement verification

Phone Number: Used to contact the individual

Email Address: Used to contact the individual

Financial Account Information: Used for reimbursement deposit account verification

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

If the employee's profile data is updated, the system replaces the data on the document that it is populated on and keeps a log that an update was made.

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?

YES

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

YES

This question is related to privacy control AR-4, Privacy Monitoring and Auditing, AR-5, Privacy Awareness and Training, and SE-2, Privacy Incident response.

- Access is approved by FSC managers and station approving officials with approving authority.
- Both contractor and VA employees are required to take Privacy, HIPAA, and information security training annually.
- System of Records Notice SORN is clear about the use of the information, specifically SORN: 13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA
http://www.va.gov/privacy/SystemsOfRecords/2001_Privacy_Act_GPO_SOR_compilation.pdf

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

The information listed in 1.1 that we collect (name, SSN, DOB, mailing address, zip code, phone numbers, e-mail address, HR Smart Employee ID, and financial account information) is retained in the system and is not purged.

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.*

Records are retained if required per National Archivist and Records Administration (NARA) standards (Reference: GRS Schedule 1.1, Item #10). Destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use.

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.*

<https://www.archives.gov/files/records-mgmt/grs/grs01-1.pdf> NARA GRS 1.1 item #10 (Disposition Authority DAA-GRS-2013-0003-0001) identifies records documenting the movement of goods and persons under government orders to be maintained for the specified retention period

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*

In accordance with VA6500.1; the Electronic records are retained if required (GRS Schedule 1.1, Item #10), and are destroyed in accordance with National Archives and Records Administration

disposition instructions. [Destroy 6 years after final payment or cancellation, but longer retention is authorized if required for business use.] We are also finalizing procedures to automate the destruction of media at the appropriate time based on published NARA and VA instructions (nightly job that removes data outside of retention period deletes / destroys metadata and image to re-use file storage).

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 PCS System uses testing sites for training and testing purposes. These testing sites do not have actual PII data and fictitious information is used as a filler in these locations. PII information is not used for searching data within the system, instead the employee name or Travel Authority number is used for all research.

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: If information is retained longer than specified, privacy information may be released to unauthorized individuals.

Mitigation: PCS follows GRS Schedule 1.1, Item #10. All information is stored for 10 years—due to business need—and is then destroyed following the procedures listed in 3.4.

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

<i>List the Program Office or IT System information is shared/received with</i>	<i>List the purpose of the information being shared /received with the specified program office or IT system</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT system</i>	<i>Describe the method of transmittal</i>
Relocating Employee's releasing HR office (VHA, VBA, NCA, OIG, VA Staff Offices)	Document with information is an HR form. HR needs for their records to drop	Name, SSN, DOB, Mailing Address, Zip code, phone number, e-mail address	Electronic only. User must login with system generated user

<i>List the Program Office or IT System information is shared/received with</i>	<i>List the purpose of the information being shared /received with the specified program office or IT system</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program Office or IT system</i>	<i>Describe the method of transmittal</i>
	the employee from their rolls.		name and self-created password.
Relocating Employee's receiving HR office (VHA, VBA, NCA, OIG, VA Staff Offices)	Document with information is an HR form. HR needs for their records to drop the employee from their rolls.	Name, SSN, DOB, Mailing Address, Zip code, phone number, e-mail address	Electronic only. User must login with system generated user name and self-created password.
Relocating Employee's receiving budget office (VHA, VBA, NCA, OIG, VA Staff Offices)	Office needs to allocate funds for relocation.	Name, SSN, DOB, Mailing Address, Zip code, phone number, e-mail address	Electronic only. User must login with system generated user name and self-created password.
Relocating Employee's receiving approving official. (VHA, VBA, NCA, OIG, VA Staff Offices)	Office needs to know who they are approving relocation entitlements for.	Name, SSN, DOB, Mailing Address, Zip code, phone number, e-mail address	Electronic only. User must login with system generated user name and self-created password.

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: Privacy information may be released to unauthorized individuals.

Mitigation: PCS system adheres to information security requirements instituted by the VA Office of Information Technology (OIT).

- Both contractor and VA are required to take Privacy, HIPAA, and information security training annually.
 - Information is shared in accordance with VA Handbook 6500
 - File access granted only to those with a valid need to know
 - Controls in place are station review of access requests followed by FSC review of access requests.
- All access requests are logged and recorded by who requested access and those approving access.

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

<i>List External Program Office or IT System information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted with the specified program office or IT system</i>	<i>List the specific data element types such as PII/PHI that are shared/received with the Program or IT system</i>	<i>List the legal authority, binding agreement, SORN routine use, etc. that permit external sharing (can be more than one)</i>	<i>List the method of transmission and the measures in place to secure data</i>
Relocation Management Worldwide (RMW)	To allow the vendor to contact employee to pick up and move household goods.	Name, mailing address, zip code, phone numbers, e-mail address.	SORN 13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA	Electronically in RMW web based system.
BGRS	To allow vendor to contact employee to assist with selling home.	Name, mailing address, zip code, phone numbers, e-mail address.	Relocation Services Contract	Electronically in vendor's web based system.
ARC Relocation Connections LLC	To allow the vendor to contact employee to pick up and move household goods.	Name, mailing address, zip code, phone numbers, e-mail address.	SORN 13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA	Electronically in American Relocation Connections (ARC)'s web based system.
Mill Move Management (M3)	To allow the vendor to contact employee to pick up and move household goods	Name, mailing address, zip code, phone numbers, e-mail address.	SORN 13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA	Electronically in M3's web based system.

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

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: Privacy information may be released to unauthorized individuals

Mitigation:

- PSC system adheres to information security requirements instituted by the VA Office of Information Technology (OIT).
- Both contractor and VA employees are required to take Privacy, HIPAA, and information security training annually.
- File access granted only to those with a valid need to know
- The companies used by VA all have a MOU or contract signed through the VA Contracting Office. The companies receive a redacted VA Form 3036 showing the relocation is authorized. The companies do not access the VA system.

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.

PCS system does not collect PII/PHI information directly from VA employees. Info is captured by HR. System of Records Notice SORN is clear about the use of the information, specifically SORN: 13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA
<https://www.govinfo.gov/content/pkg/FR-2020-04-23/pdf/2020-08611.pdf>

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

Mandatory; VA employees will not be paid relocation benefits unless their information is obtained and used to process the payment.

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

PCS system does not collect PII/PHI information directly from VA employees. Nevertheless, if an individual wish to remove consent for a particular use of their information, they should contact their servicing HR office

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: Privacy information may be collected prior to providing the written notice.

Mitigation:

- PCS system does not collect information directly from VA employees.
- Information is used only to process payments.

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.

PCS system does not collect PII/PHI information directly from VA Employees. VA employees may access their information by contacting HR or the Financial Services Center, Permanent Change of Station Counseling Center at (512) 460-5700

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.

PCS system does not collect PII/PHI information directly from VA Employees. VA employees may access their information by contacting HR or the Financial Services Center, Permanent Change of Station Counseling Center at (512)-460-5700

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.

Typically, it is the employee who brings this information to our attention. They are then notified manually at that time. Typically, either via telephone or e-mail.

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 ensure data accuracy.

PCS system does not collect PII/PHI information directly from individuals. Nevertheless, VA employees can contact the Financial Services Center, Permanent Change of Station Counseling Center at (512) 460-5700. Veterans can correct/update their information online via the VA's eBenefits website. <http://benefits.va.gov/benefits/offices.asp>

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: Inaccurate data may be used to process payments.

Mitigation: Once it has been determined a payment has been sent to the wrong account. The employee is contacted, required to submit a new 10091 banking form. Once the form is received, it is sent to the Vendorizing Team to update the banking information in FMS and the payment is resubmitted.

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.

- Individuals must take and pass training on Privacy, HIPAA, information security, and government ethics.
- Individuals must have a completed security investigation
- Once training and the security investigation are complete, a request is submitted for access. Before access is granted; this request must be approved by the supervisor, Information System Security Officer (ISSO), and OIT.

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.

- Contractors will have access to the system and their contracts are reviewed on an annual basis.
- Contractors must take and pass training on Privacy, HIPAA, information security, and government ethics.
- Contractors must have a completed security investigation.
- Once training and the security investigation are complete, a request is submitted for access...before access is granted, this request must be approved by the government supervisor, Information System Security Officer (ISSO), and Office of Information & Technology (OIT).

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.

Privacy and Information Security Awareness and Rules of Behavior (TMS course # 10176) is required for all Federal and Contractor personnel that require access to the VA Network. Annual training compliance is closely monitored.

Other required Talent Management System courses monitored for compliance:

VA 10203: Privacy and HIPAA Training

VA 3812493: Annual Government Ethics

8.4 Has Authorization and Accreditation (A&A) been completed for the system? YES

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).*

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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**.*

ATO granted 9 Jan 2019. Next Renewal Date is 26 Jan 2023.
OM.FSC.PCS is categorized as a high system.

Section 9. References

Summary of Privacy Controls by Family

Summary of Privacy Controls by Family

ID	Privacy Controls
AP	Authority and Purpose
AP-1	Authority to Collect
AP-2	Purpose Specification
AR	Accountability, Audit, and Risk Management
AR-1	Governance and Privacy Program
AR-2	Privacy Impact and Risk Assessment
AR-3	Privacy Requirements for Contractors and Service Providers
AR-4	Privacy Monitoring and Auditing
AR-5	Privacy Awareness and Training
AR-7	Privacy-Enhanced System Design and Development
AR-8	Accounting of Disclosures
DI	Data Quality and Integrity
DI-1	Data Quality
DI-2	Data Integrity and Data Integrity Board
DM	Data Minimization and Retention
DM-1	Minimization of Personally Identifiable Information
DM-2	Data Retention and Disposal
DM-3	Minimization of PII Used in Testing, Training, and Research
IP	Individual Participation and Redress
IP-1	Consent
IP-2	Individual Access
IP-3	Redress
IP-4	Complaint Management
SE	Security
SE-1	Inventory of Personally Identifiable Information
SE-2	Privacy Incident Response
TR	Transparency
TR-1	Privacy Notice
TR-2	System of Records Notices and Privacy Act Statements
TR-3	Dissemination of Privacy Program Information
UL	Use Limitation

ID	Privacy Controls
UL-1	Internal Use
UL-2	Information Sharing with Third Parties

Signature of Responsible Officials

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

Privacy Officer

Information Security Systems Officer

System Owner

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).

13VA047 Individuals Submitting Invoices-Vouchers for Payment-VA
<https://www.govinfo.gov/content/pkg/FR-2020-04-23/pdf/2020-08611.pdf>