



Privacy Impact Assessment for the VA IT System called:

Veterans Health Administration Leadership Workforce Development Cloud

VHA

Workforce Solutions

eMASS ID : 2587

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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 for VA?”.

The Veterans Health Administration (VHA) Leadership Workforce Development Cloud (VHALWD Cloud) contains information on people, positions, and organizations, work groups, workforce, workforce and leadership classes, workforce development programs and participation, personal development plans, supervisory levels, mentor and coach attributes, High Performance Development Model (HPDM) core competency, intern data, Equal Employment Opportunity reporting, succession planning, workforce planning, senior executive information, applicant tracking and recruitment, Executive Career Field (ECF) position and performance information, and education funding and programs. The method used to collect this information is a proprietary system using relational database technology. Information from these databases are joined and expanded to inform programs and processes. This combination of information is used in the administration of talent management, VHA human capital objectives, and in the support of the Executive Resources Board (ERB) and Performance Review Board (PRB) functions.

Overview

The overview is the most important section of the Privacy Impact Assessment (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:

1 General Description

- A. What is the business purpose of the program, IT system, or technology and how it relates to the program office and agency mission?*

The Veterans Health Administration (VHA) Leadership and Workforce Development Cloud (VHALWD Cloud) contains information on people, positions, and organizations, work groups, workforce, workforce and leadership classes, workforce development programs and participation, personal development plans, supervisory levels, mentor and coach attributes, High Performance Development Model (HPDM) core competency, intern data, EEO reporting, succession planning, workforce planning, senior executive information, applicant tracking and recruitment, Executive Career Field (ECF) position and performance information, and education funding and programs. The VHA Executive Management Program consists of the functions that fall under the purview of the VHA Executive Resources Board (ERB) and the VHA Performance Review Board (PRB). Their functions include executive development, recruitment and placement, organizational analysis, succession planning, workforce planning, EEO and alternative dispute-resolution (ADR) assessment, workload tracking and reporting of human capital and HR, and individual and organizational performance assessment and recognition. The method used to collect this information is a proprietary system using relational database technology. Information from these databases are joined and expanded to inform programs and processes. This combination of information is used in the administration of talent management, VHA human capital objectives, and in the support of the ERB and PRB functions. Information on approximately 480,000 VA employees is on the system. The Human Talent Management (HTM) Local Area Network (LAN) and VHALWD major application are

under Region 6. All information in the system is VA Employee related service information that is setup with internal sharing for VA Organizations and the Office Personnel Management (OPM) Federal Government Agency. The legal authorities are listed in any SORN that is associated with the system. Or either VA directive or congressional law.

B. Who is the owner or has control of the IT system or project? If the system has an eMASS entry, ensure this information matches with the eMASS entry.

VA Owned and VA Operated

2. Information Collection and Sharing

Indicate the expected number of individuals whose information is stored in the system and include a brief description of the typical client or affected individual?

C.
The VHALWD system stores information for all VA employees, approximately 480,000. The typical clients or affected individuals include VA employees across all departments and locations.

Check if Applicable	Demographic of individuals
<input type="checkbox"/>	Veterans or Dependents
<input checked="" type="checkbox"/>	VA Employees
<input type="checkbox"/>	Clinical Trainees
<input type="checkbox"/>	VA Contractors
<input type="checkbox"/>	Members of the Public/Individuals
<input type="checkbox"/>	Volunteers

D. What is a general description of the information in the IT system and the purpose for collecting this information?

The VHALWD Cloud (Veterans Health Administration Leadership Workforce Development Cloud System) provides information on people, work groups, workforce,

funding, leadership classes, workforce development, personal development plans, supervisory levels, mentor and coach, HPDM core competency, senior executive information and recruitment, human resources automation, positions, organizations, Executive Career Field information, and locations of VHA top management positions.

E. What information sharing is conducted by the IT system? A general description of the modules and components, where relevant, and their functions.

VHALWD Cloud data is received from HRSmart and PAID.

F. Are the modules/subsystems only applicable if information is shared?

VHALWD Cloud applications do not share information. Information is received from HRSmart and PAID, then stored in SQL database, and viewed through VHALWD Cloud web applications that are internal to VHALWD Cloud information system.

G. Is the system operated in more than one site to include primary and secondary 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?

VHALWD Cloud is operated in Microsoft Azure Cloud Gov.

3. Legal Authority and System of Record Notices (SORN)

H. What is the citation of the legal authority?

The legal authorities are listed in any SORN that is associated with the system. Or either VA directive or congressional law.

Title 38, United States Code, Section 8127, Title 38, United States Code, Sections 501(a) and 501(b);, Title 38, United States Code, Sections 501(a), 1705, 1710, 1722, and 5317

161VA10, *Veterans Health Administration Human Capital Management-VA*
<https://www.govinfo.gov/content/pkg/FR-2023-06-28/pdf/2023-13681.pdf>

What is the SORN?

161VA10, *Veterans Health Administration Human Capital Management-VA*
<https://www.govinfo.gov/content/pkg/FR-2023-06-28/pdf/2023-13681.pdf>

J. If the system is in the process of being modified and a SORN exists, will the SORN require amendment or revision and approval.

SORN was reviewed and approved Mar 2023.

4. System Changes

K. Will the business processes change due to the information collection and sharing?

- Yes
 No

I. Will the technology changes impact information collection and sharing?

- Yes
 No

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 Information 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.

The information selected below must match the information provided in question 2.1 as well as the data elements columns in 4.1 and 5.1. It must also match the information provided in question 3.4 of the PTA.

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 checked="" type="checkbox"/> Personal Phone Number(s) | <input type="checkbox"/> Beneficiary Numbers |
| <input checked="" type="checkbox"/> Full Social Security Number | <input checked="" type="checkbox"/> Personal Fax Number | <input type="checkbox"/> Account Numbers |
| <input type="checkbox"/> Partial Social Security Number | <input checked="" type="checkbox"/> Personal Email Address | <input type="checkbox"/> Certificate/License Numbers ¹ |
| <input checked="" type="checkbox"/> Date of Birth | <input checked="" type="checkbox"/> Emergency Contact Information (Name, Phone Number, etc. of a Different Individual) | <input type="checkbox"/> Vehicle License Plate Number |
| <input checked="" type="checkbox"/> Mother's Maiden Name | <input checked="" type="checkbox"/> Financial Information | <input type="checkbox"/> Internet Protocol (IP) Address Numbers |
| <input checked="" type="checkbox"/> Personal Mailing Address | <input type="checkbox"/> Health Insurance | <input type="checkbox"/> Medications |
| | | <input type="checkbox"/> Medical Records |

¹ *Specify type of Certificate or License Number (e.g., Occupational, Education, Medical)

- | | | |
|--|--|-------------------|
| <input checked="" type="checkbox"/> Race/Ethnicity | <input type="checkbox"/> Date of Death | * National Origin |
| <input type="checkbox"/> Tax Identification Number | <input type="checkbox"/> Business Email Address | |
| <input type="checkbox"/> Medical Record Number | <input type="checkbox"/> Electronic Data Interchange Personal Identifier (EDIPI) | |
| <input checked="" type="checkbox"/> Gender/Sex | <input checked="" type="checkbox"/> Other Data Elements (List Below) | |
| <input type="checkbox"/> Integrated Control Number (ICN) | *Grade | |
| <input type="checkbox"/> Military History/Service Connection | *Standard Form 52 | |
| <input type="checkbox"/> Next of Kin | * Disability | |

1.2 List the sources of the information in the system

These questions are related to privacy controls DI-1, Data Quality, and IP-1, Consent.

1.2a 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?

Information is received via electronic transmission from PAID, Active Directory, Nature of Action, Employee and Payroll, HRSmart.

1.2b 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 indicate why the system is using this source of data.

Information is received via electronic transmission from PAID, Active Directory, Nature of Action, Employee and Payroll, HRSmart.

1.2c Does the system create information (for example, a score, analysis, or report), list the system as a source of information?

Yes, the VHALWD system generates HR-related records and reports used for workforce management, planning, recruitment, employee development programs, financial processes, senior leadership reporting, congressional inquiries, and Freedom of Information Act (FOIA) requests. In these cases, VHALWD serves as the source of information supporting HR functions and decision-making.

1.3 Methods of information collection

These questions are related to privacy controls DI-1, Data Quality, and IP-1, Consent.

1.3a 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 technologies used in the storage or transmission of information in identifiable form?

Information is received via electronic transmission from PAID, Active Directory, Nature of Action, Employee and Payroll, HRSmart.

1.3b If the information is collected on a form and is subject to the Paperwork Reduction Act, what is the form's OMB control number and the agency form number?

N/A. Information is received via electronic transmission from PAID, Active Directory, Nature of Action, Employee and Payroll, HRSmart.

1.4 Information checks for accuracy, and how often will it be checked.

These questions are related to privacy controls DI-1, Data Quality, and DI-2, Data Integrity and Integrity Board.

1.4a 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.

VHALWD Cloud imports information daily from HRSmart. If errors are identified, HRSmart staff is contacted for corrections to be made. After data is received, data type fields are validated for the correct data type. Data is received and checked daily and weekly from our data sources upstream. Active Directory, Nature of Action, Employee and Payroll, HRSmart. These systems are responsible for checking the accuracy and their processes can be found in their PIA. Our databases go above requirements and also does basic system checks to verify the integrity of the database.

1.4b Does the system check for accuracy by accessing a commercial aggregator of information, describe this process and the levels of accuracy required by the contract?

Data is received and checked daily and weekly from our data sources upstream. Active Directory, Nature of Action, Employee and Payroll, HRSmart. These systems are responsible for checking the accuracy and their processes can be found in their PIA. Our databases go above requirements and also does basic system checks to verify the integrity of the database.

1.5 Identify the specific legal authorities, arrangements, and agreements that 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

The legal authorities are listed in any SORN that is associated with the system. Or either VA directive or congressional law.

Title 38, United States Code, Section 8127, Title 38, United States Code, Sections 501(a) and 501(b); Title 38, United States Code, Sections 501(a), 1705, 1710, 1722, and 5317
161VA10, *Veterans Health Administration Human Capital Management-VA*
<https://www.govinfo.gov/content/pkg/FR-2023-06-28/pdf/2023-13681.pdf>

1.6 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: The collection ties with the purpose of the underlying mission of the organization and its enabling authority.

Principle of Minimization: The information is directly relevant and necessary to accomplish the specific purposes of the program.

Principle of Individual Participation: The program, to the extent possible and practical, collects information directly from the individual.

*Principle of Data Quality and Integrity: VA policies and procedures must ensure that personally identifiable information is accurate, complete, and current.
This 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: Due to the sensitive nature of this data, there is a risk that, if the data were accessed or received by unauthorized parties/recipients or otherwise breached, serious personal, professional and/or financial harm may result for the affected individuals. VA would be required to provide credit monitoring and ID theft insurance.

Mitigation: VHALWD Cloud uses a number of security measures designed to ensure that the information is not inappropriately disclosed or released. Use of encryption to secure data during transmission and at rest; user information security and privacy education and training; restricted use of removable media, weekly administrative rounds to identify any potential issues, security screens and secure mailing. The measures also include, access controls, security assessments, contingency planning; incident response, system and communications protection. Our facility employs all security controls in the respective high impact control baseline unless specific exceptions have been allowed based on the guidance provided in the National Institute of Standards and Technology (NIST) Special Publication 800-37 and specific VA directives.

The VHALWD Cloud applications are built using VA active directory roles and permissions. The VHALWD Cloud helpdesk has the process documented and assists users throughout VA. Security baselines approved by VA are in place on each SQL server to add additional protection.

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 that 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.

PII/PHI Data Element	Internal Use	External Use
<<Name>>	File Identification purposes	Not used
Name	Used to identify the VA employee for reports and VA application functions such as HR management in WebHR.	Not used
Full Social Security Number	Used to identify the VA employee for reports and VA application functions such as HR management in WebHR.	Not used
Date of Birth	Used to identify the VA employee for reports and VA application functions such as HR management in WebHR.	Not used
Mothers Maiden Name	Used for reports and VA application functions such as HR Management in WebHR	Not used
Personal Mailing Address	Used for reports and VA application functions such as HR Management in WebHR	Not used
Personal Phone Number	Used for reports and VA application functions such as HR Management in WebHR	Not used
Personal Fax Number	Used for reports and VA application functions such as HR Management in WebHR	Not used
Personal Email Address	Used for reports and VA application functions such as HR Management in WebHR	Not used
Emergency Contact	Used for reports and VA application functions such as HR Management in WebHR	Not used
Race/Ethnicity	Used for reports and VA application functions such as HR Management in WebHR Used for reports and VA	Not used

	application functions such as HR Management in WebHR	
Grade	Used for reports and VA application functions such as HR Management in WebHR	Not used
SF52	Used for reports and VA application functions such as HR Management in WebHR	Not used
Gender	Used for reports and VA application functions such as HR Management in WebHR	Not used
Disability	Used for reports and VA application functions such as HR Management in WebHR	Not used

2.2 Describe the types of tools used to analyze data and what type of data may be produced.
These questions are related to privacy controls DI-1, Data Quality, DI-2, Data Integrity and Integrity Board, and SE-1, Inventory of Personally Identifiable Information.

2.2a 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?

Tools used are VA’s licensed ProClarity and pyramid analytics software. Pyramid is replacing ProClarity as VA’s standard analytics software. A recent example report would be the VA Secretary and team asking how many VA vacant positions have been filled. Microsoft SQL Management Studio is used to evaluation and reporting. Data is used to produce valuable reports for national leadership and succession planning, members of congress, FOIA and other data calls in addition to the HR and other web applications mentioned above.

2.2b 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.

When the VHALWD Cloud system creates new information about an individual, it is stored in a separate database that references the individual’s existing records. This information supports HR functions such as workforce planning, compliance reporting, and employee programs. Authorized HR staff and managers can access this data based on their roles and job responsibilities, ensuring it is used appropriately and securely.

2.3 How the information in the system is secured.

These questions are related to security and privacy controls SC-9, Transmission Confidentiality, and SC-28, Protection of Information at Rest.

2.3a What measures are in place to protect data in transit and at rest?

All data is stored in SQL databases. All SQL databases have Transparent Data Encryption (TDE) applied. Data in transit is protected by SSL and SFTP.

2.3b If the system is collecting, processing, or retaining Social Security Numbers, are there additional protections in place to protect SSNs? (refer to PTA question 3.8).

All SSNs are in SQL databases. All SQL databases have Transparent Data Encryption (TDE) applied. As a common practice, we do scramble our SSN fields in our non-production applications. Our approach is not to show the SSN in our applications unless there is an absolute need. In those cases, we will display the last 4. In our production databases, the data we get from HRSmart has the full SSN. We also use role-based restrictions for both database and applications. We follow the principle of least privilege.

2.3c How is PII/PHI safeguarded in accordance with OMB Memorandum M-06-15?

All PII is stored in SQL databases. All SQL databases have Transparent Data Encryption (TDE) applied. We also use role-based restrictions for both database and applications. We follow the principle of least privilege.

2.4 PRIVACY IMPACT ASSESSMENT: Use of the information.

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?

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.

2.4a How is access to the PII determined?

Access to PII in the VHALWD system is determined based on the user's role and job responsibilities, following the principle of least privilege. Only individuals who need access to perform specific HR functions are granted permission.

2.4b Are criteria, procedures, controls, and responsibilities regarding access documented? How are the documented, i.e. Policy, SOP, other. And where is this documentation located?

VHAWD Cloud criteria, procedures, controls and responsibilities are listed in the VHALWD Cloud Access Control (AC) SOP

2.4c Does access require manager approval?

Yes, the VHALWD system requires manager approval to ensure that only authorized personnel can access sensitive information.

2.4d Is access to the PII being monitored, tracked, or recorded?

IIS logs and SQL transaction logs track user access.

2.4e Who is responsible for assuring safeguards for the PII as identified in eMASS?

Veteran Administration

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:

Full Social Security Number:

Date of Birth:

Mother's Maiden Name:

Mailing Address:

Zip Code:

Phone Number:

Fax Number:

Email Address:

Emergency Contact:

Race:

Grade:

SF52:

Gender:

Disability:

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. If the system is using cloud technology, will it be following the NARA approved retention length and schedule <https://www.archives.gov/records-mgmt/grs>? This question is related to privacy control DM-2, Data Retention and Disposal.

Documents are required for retention following the guidance in Guide to Personnel Recordkeeping (GPR) which clearly outlines documents required for long term retention and/or transfer. The Title V of the Code of Federal Regulations (CFR), § 293.405 which explains the retention period for SES and non-SES performance rating of record. Finally, the eOPF Master Forms List identifies forms designated as Permanent, Temporary, and Agency specific documents for both Title V and non-Title VA organizations for those agencies that have migrated to eOPF. The retention period is dependent on the type of data and the intended use. VA Records Control Schedule 10-1 (page 8) has Records Management Responsibilities for developing policies and procedures for effective and efficient records management throughout VHA. Program officials are responsible for creating, maintaining, protecting, and disposing of records in their program area in accordance with National Archives and Records Administration (NARA) regulations and VA policy. All VHA employees are responsible to ensure that records are created, maintained, protected, and disposed of in accordance with NARA regulations and VA policies and procedures.

3.3 The retention schedule approved by the VA records office and the National Archives and Records Administration (NARA).

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. Please work with the system VA Records Officer to answer these questions. This question is related to privacy control DM-2, Data Retention and Disposal.

3.3a Are all records stored within the system of record indicated on an approved disposition authority?

Yes, documents are required for retention following the guidance in Guide to Personnel Recordkeeping (GPR) which clearly outlines documents required for long term retention and/or transfer. The Title V of the Code of Federal Regulations (CFR), § 293.405 which explains the retention period for SES and non-SES performance rating of record. Finally, the eOPF Master Forms List identifies forms designated as Permanent, Temporary, and Agency specific documents for both Title V and non-Title V organizations for those agencies that have migrated to eOPF. The retention period is dependent on the type of data and the intended use. VA

Records Control Schedule 10-1 (page 8) has Records Management Responsibilities for developing policies and procedures for effective and efficient records management throughout VHA. Program officials are responsible for creating, maintaining, protecting, and disposing of records in their program area in accordance with National Archives and Records Administration (NARA) regulations and VA policy. All VHA employees are responsible to ensure that records are created, maintained, protected, and disposed of in accordance with NARA regulations and VA policies and procedures.

RCS 10-1 link for VHA: www.va.gov/vhapublications/rcs10/rcs10-1.pdf

RCS VB-1, Part II Revised for VBA:

www.benefits.va.gov/WARMS/docs/admin20/rcs/part2/part2.pdf

3.3b Please indicate each records retention schedule, series, and disposition authority?

VHALWD leverages the VA Records Control Schedule 10-1 and HRSmart Enterprise System for HR record retention schedule and management to maintain regulation compliance. The specific schedule is set by the department level enterprise system and VHALWD receives any updates through the daily download.

Name:

Full Social Security Number:

Date of Birth:

Mother's Maiden Name:

Mailing Address:

Zip Code:

Phone Number:

Fax Number:

Email Address:

Emergency Contact:

Race:

Grade:

SF52:

Gender:

Disability

3.4 What are the procedures for the elimination or transfer of SPI?

Explain how records are destroyed, eliminated, or transferred to NARA at the end of their mandatory 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.

Applicable federal regulatory requirements (NARA & VHA Records Control Schedule 10-1) will be followed for eliminating or disposing of data. We electronically retrieve our data from other sources as described above. Our upstream resources eliminate records based on the records control schedules

and we download the refreshed data. Paper records that are able to be shredded are done so onsite by a certified shredding company. Old hard drives from computers are destroyed as well with a certificate of destruction. For the database, the upstream data sources remove records as required by their retention period and policy and that data is received by our downstream database.

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

For the development and training environments, PII such as an SSN is scrambled to protect the data.

The baseline security requirements and safeguards cover a large number of security-related areas with regard to protecting the confidentiality, integrity, and availability of VA information systems and the information processed, stored, and transmitted by those systems. The security-related areas include: access control; awareness and training; audit and accountability; certification, accreditation, and security assessments; configuration management; contingency planning; identification and authentication; incident response; maintenance; media protection; physical and environmental protection; planning; personnel security; risk assessment; systems and services acquisition; system and communications protection; and system and information integrity. Our facility employs all security controls in the respective impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in NIST Special Publication 800-53 and specific VA directives. An updated PIA, PTA and SORN are all in place and updated on the VA approved schedule.

The application is role specific and requires approval to receive roles to access information through active directory. Safeguards include a VA baselined SQL database, servers and VA Cybersecurity Operations Center recurring scans such as PIN testing for servers, WASA scans for applications and database scans. Users complete recurring training in handling PII to include the yearly VA rules of behavior training and more detailed WS helpdesk standard operating procedures. The WS helpdesk manages access to roles and if requested by supervisors can remove access for disciplinary reasons.

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. (Work with your System Privacy Officer (PO) to complete all Privacy Risk questions inside the document in this section).

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: The project retains only the information necessary for its purpose, additionally, the PII is retained only for as long as necessary and relevant to fulfill the specified purposes.

Principle of Data Quality and Integrity: The PIA should describe 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: There is a risk that VHALWD Cloud will retain information for longer than necessary which can put the records at greater risk of being breached.

Mitigation: VHALWD Cloud adheres to the VA Records Control Schedule 10-1 as part of its enterprise system, ensuring proper management and disposition of records. To meet VHA business requirements, VHALWD Cloud additionally utilizes archived data for reporting needs, including Leadership, Congressional, and FOIA data requests, with extended retention periods. This approach allows for comprehensive data availability while maintaining compliance with federal records management regulations. The archived HR data maintained by VHALWD Cloud poses a low privacy risk due to implemented security safeguards and the application of the principle of least access. To further mitigate this minor risk, VHALWD Cloud plans to migrate to the upcoming VA data warehouse, which is expected to be available in fiscal years 2026/2027. This migration will enhance data management capabilities and align with VA's broader IT modernization efforts, ultimately improving data infrastructure and utilization across the organization.

Section 4. Internal Sharing/Receiving/Transmitting and Disclosure

The following questions are intended to define the scope of information sharing/receiving/transmitting within VA.

PII Mapping of Components

4.1a **VHALWD Cloud** consists of **49** key components (servers/databases/instances/applications/software/application programming interfaces (API)). Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected by **VHALWD Cloud** and the reasons for the collection of the PII are in the table below.

Note: Due to the PIA being a public facing document, please do not include server names in the table. The first table of 3.9a in the PTA should be used to answer this question.

Internal Components Table

Component Name (Database, Instances, Application, Software, Application Program Interface (API) etc.) that contains PII/PHI	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
HTM (Human Talent Management) Data.htm.va.gov <ul style="list-style-type: none"> • ARPA • aspRoleManagement • CDW • DataFeeds • Education_Documentation • EEODemographics • EMI • ExternalCustomers • HLTIBudget • HLTITalentManagement • HPDM_Documents • HR_Administration • HR_Classification • HR_Staffing • hrro_education • HRSmart • HTM • HTM_Documents • IndividualAssessment • PAID • PCMM • ProgramEvaluation • RecurringReports • USASTaffing • VacancyTracking • VHALWD • Wmctravel • WorkforcePlanning • Working • aes • dbaTools • distribution 	Yes	Yes	<ul style="list-style-type: none"> • Emergency Contact Information (Name, Phone Number, etc. of a different individual) • Financial Account Information • Race/Ethnicity • Gender • Grade • SF52 • Disability National Origin 	Utilize WebHR software app in support of HR activities	Authentication/ Authorization controls with access limited to assigned roles to approved users. Access is removed when users leave or change positions. Use of Delta tables to monitor changes. Information is masked on screen for authorized users, not displayed for all others.

<ul style="list-style-type: none"> • ErrorHandling • HelpDesk_WRRS • HPDM_Messaging • HR_Global • HR_Processing • HR_Reports • Master • Model • Msdb • PAID_Reports • ReportServer • ReportServerTempDB • SystemState • Tempdb • VA_Organizations • Vacancies 					
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4.1b List internal organizations information is shared/received/transmitted, the information shared/received/transmitted, and the purpose, and how the information is transmitted.

NOTE: Question 3.9b (second table) on Privacy Threshold Analysis should be used to answer this question.

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>IT system and/or Program office. 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 PII/PHI data elements shared/received/transmitted.</i>	<i>Describe the method of transmittal</i>
PAID	Received from VA source for VA Internal reports, data calls, FOIA requests and VHALWD web applications data for employees	Full name, social security number, date of birth, race national origin, handicap status, and performance rating, VHA, VBA, and NCA	SFTP
Active Directory	Received from VA source for VA Internal reports, data calls, FOIA requests and VHALWD web applications data for employees	Received from VA source for Database items from section 2 above Used for reports and VA application functions such as HR management in the WebHR application.	Electronic/File Transfer
Nature of Action	Received from VA source for VA Internal reports, data calls, FOIA requests and VHALWD web applications data for employees	Full name, social security number, date of birth, race national origin, handicap status, and performance rating	Electronic/File Transfer/SFTP
Employee and Payroll	Received from VA source for VA Internal reports, data calls, FOIA requests and VHALWD web applications data for employees	Full name, social security number, date of birth	Electronic/File transfer
HRSmart	Received from VA source for VA Internal reports, data calls, FOIA requests and VHALWD web applications data for employees	Full name, social security number, Address, email, date of birth, race national origin, handicap status, and performance rating, VHA, VBA, and NCA	SFTP

4.2 PRIVACY IMPACT ASSESSMENT: Internal sharing and disclosure

Discuss the privacy risks associated with the sharing of information within the VA network and what steps, if any, are currently being taken to mitigate those identified risks. (Work with your System ISSO to complete all Privacy Risk questions in this section.).

This question is related to privacy control UL-1, Internal Use.

Follow the format below:

Privacy Risk: Due to the sensitive nature of this data, there is a risk that, if the data were accessed or received by unauthorized parties/recipients or otherwise breached, serious personal, professional and/or financial harm may result for the affected individuals. VA would be required to provide credit monitoring and ID theft insurance.

Mitigation: Procedures will be enforced using technical and managerial control mechanisms including following the Records Control Schedule (RCS) 10-1 VA guidance and having a disposal authority and log files for past and future suspense notices. The baseline security requirements and safeguards cover a large number of security-related areas with regard to protecting the confidentiality, integrity, and availability of VA information systems and the information processed, stored, and transmitted by those systems. The security-related areas include: access control; awareness and training; audit and accountability; certification, accreditation, and security assessments; configuration management; contingency planning; identification and authentication; incident response; maintenance; media protection; physical and environmental protection; planning; personnel security; risk assessment; systems and services acquisition; system and communications protection; and system and information integrity. Our facility employs all security controls in the respective impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in NIST Special Publication 800-53 and specific VA directives. An updated PIA, PTA and SORN are all in place and updated on the VA approved schedule.

The application is role specific and requires approval to receive roles to access information through active directory. Safeguards include a VA baselined SQL database, servers and VA Cybersecurity Operations Center recurring scans such as PIN testing for servers, WASA scans for applications and database scans. Users complete recurring training in handling PII to include the yearly VA rules of behavior training and more detailed WS helpdesk standard operating procedures. The WS helpdesk manages access to roles and if requested by supervisors can remove access for disciplinary reasons.

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 List the external organizations (outside VA) that information shared/received. and information shared/received, and the purpose, and how the information transmitted and what measures are taken to ensure it is secure.

The sharing of information outside the agency must be compatible with the original collection. The sharing must be covered by an appropriate routine use in a SORN. If not covered, 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: Question 3.10 on Privacy Threshold Analysis should be used to answer this question.

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

<i>List IT System or External Program Office information is shared/received with</i>	<i>List the purpose of information being shared / received / transmitted</i>	<i>List the specific PII/PHI data elements that are processed (shared/received/transmitted)</i>	<i>List agreements such as: Contracts, MOU/ISA, BAA, SORN. 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>
eOPF OPM (Office Personnel Management)	Extracts from the VHALWD to the OPM system	Database items including VA employee name, SSN and performance appraisal documents to be loaded into eOPF.	MOU/ISA/ICD	Electronic/File Transfer/IBM Connect Direct
USASTaffing	Retrieves OPM	Name, Financial Information	MOU/ISA/ICD	SFTP
Salesforce	Retrieves HR data from Salesforce	Full name, target grade, hiring related data fields	MOU/ISA/ICD	SFTP/DSS

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.

If no External Sharing listed on the table above, (State there is no external sharing in both the risk and mitigation fields).

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: Due to the sensitive nature of this data, there is a risk that, if the data were accessed or received by unauthorized parties/recipients or otherwise breached, serious personal, professional and/or financial harm may result for the affected individuals. VA would be required to provide credit monitoring and ID theft insurance.

Mitigation: Procedures will be enforced using technical and managerial control mechanisms including following the Records Control Schedule (RCS) 10-1 VA guidance and having a disposal authority and log files for past and future suspense notices. The baseline security requirements and safeguards cover a large number of security-related areas with regard to protecting the confidentiality, integrity, and availability of VA information systems and the information processed, stored, and transmitted by those systems. The security-related areas include: access control; awareness and training; audit and accountability; certification, accreditation, and security assessments; configuration management; contingency planning; identification and authentication; incident response; maintenance; media protection; physical and environmental protection; planning; personnel security; risk assessment; systems and services acquisition; system and communications protection; and system and information integrity. Our facility employs all security controls in the respective impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in NIST Special Publication 800-53 and specific VA directives. An updated PIA, PTA and SORN are all in place and updated on the VA approved schedule.

The application is role specific and requires approval to receive roles to access information through active directory. Safeguards include a VA baselined SQL database, servers and VA Cybersecurity Operations Center recurring scans such as PIN testing for servers, WASA scans for applications and database scans. Users complete recurring training in handling PII to include the yearly VA rules of behavior training and more detailed WS helpdesk standard operating procedures. The WS helpdesk manages access to roles and if requested by supervisors can remove access for disciplinary reasons.

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 The notice provided to the individual before collection of the information. Please provide a copy and/or screen shot of a web notice of the notice as an Appendix-A 6.1 on the last page of the document. (A notice may include a posted privacy policy, a Privacy Act notice on forms, notice given to individuals by the sources system, or a system of records notice published in the Federal Register.) If notice was not provided, explain why.

These questions are 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.

6.1a Provide the Privacy Notice provided to the public by this system or any source systems. Include a copy of the notice in Appendix A of the PIA, the Federal Register citation, or Privacy Statement from collection of information such as forms or surveys.

Multiple notices below and a system of records notice 161VA10, *Veterans Health Administration Human Capital Management-VA*
<https://www.govinfo.gov/content/pkg/FR-2023-06-28/pdf/2023-13681.pdf>

Initial Warning/Acknowledgement, and when user session expires:

“This U.S. Government computer system contains sensitive information and is for official use only. Any information exported from this application to your desktop, requires the same level of security as appropriate action on any information of a sensitive nature.

Activity on this system is monitored. Use of this system constitutes your unconditional consent to such monitoring and no expectation of privacy. Misuse of, unauthorized access to, or attempted unauthorized access to this system will result in administrative disciplinary action and/or criminal prosecution as appropriate. “

Button to click : “I Acknowledge”

Session Time out Warning:

“Session is Expiring!” Occurs when 15 minutes of inactivity.

“Session (Page) Expired!” Occurs when 15 minutes 30 seconds of no activity.

6.1b If notice was not provided, explain why.

Notice provided.

6.1c Provide how the notice provided at the time of collection meets the purpose of use for this system.

N/A. VHALWD Cloud does not collect information directly from users.

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.

Certain information is required by VA HR when being hired. Information is VA employment and demographic data. The VA employee has the right to work with his or her HR office on what information they provide.

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.

Certain information is required by VA HR when being hired. Information is VA employment and demographic data. The VA employee has the right to work with his or her HR office on what information they provide.

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. (Work with your Privacy Officer (PO) to complete all Privacy Risk questions inside the document this section).

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

Principle of Transparency: This is referring to sufficient notice provided to the individual.

Principle of Use Limitation: The information used only for the purpose for which notice was provided either directly to the individual or through a public notice. The procedures in place must 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: The risk for not providing notice would be a lack of transparency and the employee not being aware of the system's use of information.

Mitigation: Procedures will be enforced using technical and managerial control mechanisms including following the Records Control Schedule (RCS) 10-1 VA guidance and having a disposal authority and log files for past and future suspense notices. The baseline security requirements and safeguards cover a large number of security-related areas with regard to protecting the confidentiality, integrity, and availability of VA information systems and the information processed, stored, and transmitted by those systems. The security-related areas include: access control; awareness and training; audit and accountability; certification, accreditation, and security assessments; configuration management; contingency planning; identification and authentication; incident response; maintenance; media protection; physical and environmental protection; planning; personnel security; risk assessment; systems and services acquisition; system and communications protection; and system and information integrity. Our facility employs all security controls in the respective impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in NIST Special Publication 800-53 and specific VA directives. An updated PIA, PTA and SORN are all in place and updated on the VA approved schedule.

The application is role specific and requires approval to receive roles to access information through active directory. Safeguards include a VA baselined SQL database, servers and VA Cybersecurity Operations Center recurring scans such as PIN testing for servers, WASA scans for applications and database scans. Users complete recurring training in handling PII to include the yearly VA rules of behavior training and more detailed HCSS helpdesk standard operating procedures. The WMC helpdesk manages access to roles and if requested by supervisors can remove access for disciplinary reasons.

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 The procedures that allow individuals to gain access to their information.

These questions are related to privacy control IP-2, Individual Access, and AR-8, Accounting of Disclosures.

7.1a 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 VA Public Access Link-Home (efoia-host.com) to obtain information about FOIA points of contact and information about agency FOIA processes.

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

To request a FOIA request outside of VA, see instructions at <http://www.foia.gov/how-to.html>.

7.1b 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)?

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

To request a FOIA request outside of VA, see instructions at <http://www.foia.gov/how-to.html>.

7.1c 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?

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

To request a FOIA request outside of VA, see instructions at <http://www.foia.gov/how-to.html>.

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.

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

To request a FOIA request outside of VA, see instructions at <http://www.foia.gov/how-to.html>

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.

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.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. **Example: Some projects allow users to directly access and correct/update their information online. This helps ensure data accuracy.***

This question is related to privacy control IP-3, Redress, and IP-4, Complaint Management.

Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

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.** (Work with your Privacy Officer (PO) to complete all Privacy Risk questions in this section).*

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

***Principle of Individual Participation:** The individual must be provided with the ability to find out whether a project maintains a record relating to them.*

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

***Principle of Individual Participation:** The mechanism by which an individual is able to prevent information about them obtained for one purpose from being used for other purposes without their knowledge.*

This question is related to privacy control IP-3, Redress.

Follow the format below:

Privacy Risk: – VA employees can update their employee information whenever they need to. The risk for employees is the employee entering incorrect information in HRSmart and/or PAID, which is then downloaded to VHALWD.

Mitigation: Employees update their data through HRSmart and PAID systems. Employees can also access <https://dev.azure.htm.va.gov/portal> for HTM applications. Employees work with their HR office for procedures for updating their information. Employees can access HRSmart at <https://ssologon.iam.va.gov/CentralLogin/> and MyPay at <https://mypay.dfas.mil/mypay.aspx>.

Section 8. Technical Access and Security

The following questions are intended to describe technical safeguards and security measures. (Work with your ISSO to complete this section).

8.1 The procedures in place to determine which users may access the system, must be documented.

These questions are related to privacy control AR-7, Privacy-Enhanced System Design and Development.

8.1a Describe the process by which an individual receives access to the system?

The VHALWD Cloud applications are built using VA active directory roles and permissions. The WS helpdesk has the process documented and assists users throughout VA. Security triggers approved by VA NSOC are in place on each SQL server to add additional protection.

8.1b 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?

VHALWD Cloud is only accessible for authorized VA employees.

8.1c 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.

- **Read-Only Access** – For users who need to view data but cannot make changes.
- **Data Entry/Update Roles** – For personnel responsible for entering or updating records.
- **Administrator Roles** – For users who manage system settings, user accounts, and permissions.
- **Reviewer/Approver Roles** – For managers who review and approve HR actions or decisions.

VHALWD Cloud follows the Least Privilege.

8.2. Contractor signed Non-Disclosure Agreement (NDA), Business Associate Agreement (BAA) etc. in place.

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.

8.2a Has a contractor confidentiality agreement, Business Associate Agreement (BAA), or a Non-Disclosure Agreement (NDA) been developed for contractors who work on the system?

No. All contractors are required to completed VA Privacy and Information Security Awareness and Rules of Behavior.

8.2a. Will VA contractors have access to the system and the PII?

Yes, Workforce Solutions help desk contractors have access to VHALWD Cloud and PII.

8.2b. What involvement will contractors have with the design and maintenance of the system?

Contractors are not involved with design nor maintenance of VHALWD Cloud.

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.

Yearly training is required for all users including additional training for managing PII and paperwork for PII including VA Privacy and information security awareness and rules of behavior and Annual Government Ethics Training. Additional training and standard operating procedures are managed at the team helpdesk level.

8.4 The Authorization and Accreditation (A&A) completed for the system.

8.4a If completed, provide:

1. *The Security Plan Status:* In Progress
2. *The System Security Plan Status Date:* In Progress

3. *The Authorization Status: In Progress*
4. *The Authorization Date: In Progress*
5. *The Authorization Termination Date: In Progress*
6. *The Risk Review Completion Date: In Progress*
7. *The FIPS 199 classification of the system (LOW/MODERATE/HIGH): LOW*

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

8.4b If not completed or In Process, provide your **Initial Operating Capability (IOC) date**.

July 25, 2024

Section 9 – Technology Usage

The following questions are used to identify the technologies being used by the IT system or project.

9.1 Does the system use cloud technology? If so, what cloud model is being utilized?

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. Types of cloud models include: Software as a Service (SaaS), Infrastructure as a Service (IaaS), Platform as a Service (PaaS), Commercial off the Shelf (COTS), Desktop as a Service (DaaS), Mobile Backend as a Service (MBaaS), Information Technology Management as a Service (ITMaaS). This question is related to privacy control UL-1, Information Sharing with Third Parties. (Refer to question 1.8 of the PTA)

VHALWD Cloud utilizes VAEC, Microsoft Azure Gov Cloud.

9.2 Does the contract with the Hosting Cloud Service Provider, Contractors and VA customers establish who has ownership rights over data including PII? (Provide contract number and supporting information about PII/PHI from the contract). (Refer to question 3.3.1 of the PTA) This question is related to privacy control AR-3, Privacy Requirements for Contractors, and Service Providers.

VA Ownership VA Operated.

9.3 Will the CSP collect any ancillary data and if so, who has ownership over the ancillary data?

Per NIST 800-144, cloud providers hold significant details about the accounts of cloud consumers that could be compromised and used in subsequent attacks. Ancillary data also involves information the cloud provider collects or produces about customer-related activity in the cloud. It includes data collected to meter and charge for consumption of resources, logs and audit trails, and other such metadata that is generated and accumulated within the cloud environment.

This question is related to privacy control DI-1, Data Quality.

N/A. No ancillary data is being collected by CSP.

9.4 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 are the roles and responsibilities involved between the organization and cloud provider, particularly with respect to managing risks and ensuring organizational requirements are met? This question is related to privacy control AR-3, Privacy Requirements for Contractors and Service Providers.

N/A. This is VA owned and operated. CSP Staff do not have access inside VHALWD Cloud.

9.5 If the system is utilizing Robotics Process Automation (RPA), please describe the role of the bots.

Robotic Process Automation is the use of software scripts to perform tasks as an automated process that executes in parallel with or in place of human input. For example, will the automation move or touch PII/PHI information. RPA may also be referred to as “Bots” or Artificial Intelligence (AI).

N/A

Section 10. 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
UL-1	Internal Use
UL-2	Information Sharing with Third Parties

Signature of Responsible Officials

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

Privacy Officer, Harash Katyal

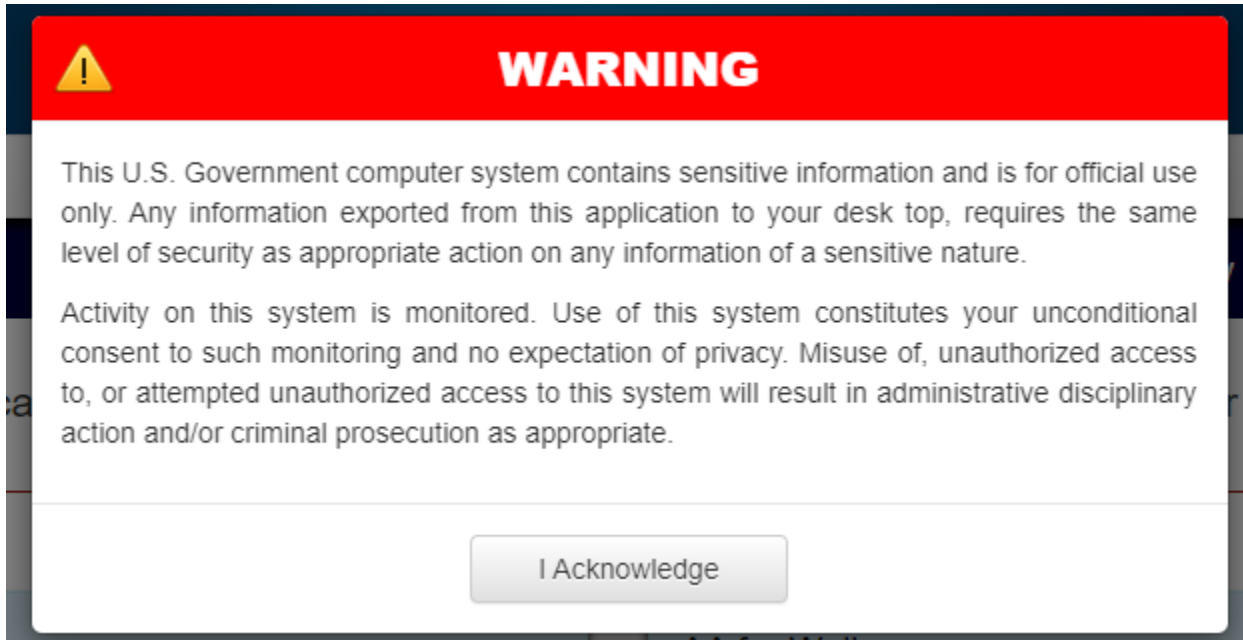
Information System Security Officer, Steve Cosby

Information System Owner, James Styers

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; screen shot of a website collection privacy notice).

<https://dev.azure.htm.va.gov/portal>



HELPFUL LINKS:

Records Control Schedule 10-1 (va.gov)

General Records Schedule

<https://www.archives.gov/records-mgmt/grs.html>

National Archives (Federal Records Management):

<https://www.archives.gov/records-mgmt/grs>

VA Publications:

<https://www.va.gov/vapubs/>

VA Privacy Service Privacy Hub:

<https://dvagov.sharepoint.com/sites/OITPrivacyHub>

Notice of Privacy Practice (NOPP):

VHA Directive 1605.04

IB 10-163p (va.gov)