Privacy Impact Assessment for the VA IT System called:

Common Functional APIs (CFAPI)

Veterans Benefits Administration (VBA)

Office of information Technology (OIT)

eMASS ID # 2048

Date PIA submitted for review:

06/16/2025

System Contacts:

System Contacts

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Abstract

The abstract provides the simplest explanation for "what does the system do for VA?".

The Common Functional APIs (CFAPI) provides Veteran Benefits Management Service (VBMS) applications with a convenient programmatic interface for Create Read Update and Delete (CRUD) operations for the following data: Veteran profile, notes and claims. The Application Programming Interface (API) provides Tenants on the BIP Platform with a simplified mechanism to access Veteran data, notes and Claim information, a typical user will be a veteran or a dependent of a veteran. Information is collected and processed for Veterans and dependents including First & last Name, Address, Date of Birth, Date of Death (if applicable), and Social Security Number to support VBMS applications that need to access this data to process claims.

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?*
>
>> Manage Claimant Record is the ability to verify service and record, create a new one, or reconcile duplicate or distinct records in support of claims establishment.
>
> *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.*
>
>> CFAPI is owned and controlled by the controlled by the Office of Information Technology (OIT).

2. Information Collection and Sharing

> *C. 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?*
>
>> A typical individual stored in this system would be a Veteran and/or Dependent. The number of individuals within this system can vary by region with estimation of around 12,803,162 at this time.

Check if Applicable	Demographic of individuals
☒	Veterans or Dependents
☐	VA Employees
☐	Clinical Trainees
☐	VA Contractors
☐	Members of the Public/Individuals
☐	Volunteers

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

Information is collected and processed for Veterans and dependents including First & Last Name, Address, Date of Birth (DOB), Date of Death (DOD) (if applicable), Social Security Number (SSN), Phone, Sex, Email, Financial Information, Benefit Information, Claims Decisions, Participant ID, Integration control number (ICN), Military History/Service Connection to support C&P/VBMS applications that need to access this data to process claims.

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

CFAPI shares information with the following VA systems:

Corporate Database (CorpDB)- Is the system of record for Veteran information.

Compensation and Pension User Interface (CPUI) components:

Interactive Development Assist Banner (IDB) shown as Outstanding Development Actions (ODAs) User Interface (UI) - View messages on the Outstanding Development Actions banner on the Claim Details page in VBMS-Core and select links to navigate to other pages in VBMS-Core where actions can be resolved.

Veteran Summary Panel (VSP) UI - Veteran Summary Panel UI allows users to access a variety of information about the Veteran whose documents are in view.

Veteran Service Treatment Records (STR) Assist UI - STR Assist UI is the STR Requests page in VBMS Core.

IDA Admin UI - STR Assist UI is the STR Requests page in VBMS Core.

Benefits Integration Platform (BIP) component:

Confluent - Confluent is an open-source distributed event streaming platform built on Apache Kafka. Kafka acts as a distributed, fault-tolerant, and scalable commit log, providing a unified platform for building real-time data pipelines. This is achieved through the use of Kafka Brokers, which are responsible for storing and managing the streams of records, referred to in the architecture as "topics." Through the use of the various pieces of the platform, Confluent is able to build event-driven applications and create universal data pipelines of historical and real-time data.

Document Generator (DocGen) components:

Letters Service - Letters Service calls DocGen Service to build a list of letters that can be generated and an interview screen for a given letter. It also calls data services upon user preview or finalize to collect data identified in the letter definition.

GenStore Service - DocGen GenStore Service is an orchestration service used to coordinate the generation and storage of documents, as well as manage retrieval of documents that have been previously stored. This includes the coordination of locally stored documents used for preview, and permanent storage in Claim Evidence/eFolder for finalized or completed documents.

Veteran Enterprise File Storage (VEFS) - Claim Evidence - Claim Evidence is a file service for handling the storage and management of files supporting VA benefit claims. It serves as a modernized point of entry to files previously only accessible through VBMS eFolder. It is designed for easier implementation by consuming systems, but also with the ability to replace the eFolder logic within VBMS. The Claim Evidence UI has replaced the functionality of the VBMS eFolder/Documents UI.

Benefits Integration and Administration - Benefits Services (BIA-BS) component:

Claims API - The Claims API provides a mechanism to create and view claims, as well as create, view, and delete contentions.

VA Master Person Index (VA MPI) - VA MPI is ingested into VBMS for reporting, analysis and data correlation of veteran's identity across the VA enterprise.

Benefits Enterprise Platform (BEP) Services - BEP Services provide information flow to and from the VBA Corporate Database (CRP) and client systems, both internal and external to VA, for the purpose of processing Veteran benefits.

VBMS (Veteran Benefits Management System) Ratings (VBMS-R) - VBMS-R allows rating specialists to rate a case, determining the extent of disability and recommending a disability benefit.

VBMS Core (VBMSCORE) - VBMSCORE is a component of VBMS used to create and develop a Veteran's claim. It is the primary maintenance center for Veteran Service Representatives (VSRs). Core also includes the National Work Queue (NWQ) application.

Claim Establishment (CEST) - The purpose of VBMS Claim Establishment (CEST) is to handle performing the same claim establishment processes that currently live in VBMS Core within BIP. This includes both the modernized user interface and backend processes that occur. In addition to the existing processes in Core, we will be adding the capability to establish Decision Reviews (030, 040, 930) claims.

Work Queue (WORKQ) - WORKQ is a replacement for legacy capability originally built inside of VBMS Core that supported the viewing, routing, assignment, and brokering of work items. It extracts the logical elements of the legacy application within VBMS and restructures them as a standalone application for use both in updated VBMS capabilities as well as new capabilities requiring access to work item events. It contains two functional areas, National Work Queue (NWQ) and Work Queue, as well as shared architectural components.

Package Manager (PacMan) - PacMan provides the ability to create "packages" of documents to be sent to a Veteran or a 3rd party representative. Packages are created in PacMan and sent for distribution by the VA's Centralized Benefits Communications Management (CBCM) system. PacMan is a capability that processes package distribution events from Veteran's Benefits Management System (VBMS) which resides on the Benefits Integrated Platform. These distribution events are sent to the CBCM system which routes them to the appropriate vendor for fulfillment and delivery of documents.

Federal Tax Information File Repository (FTI-FFR) - FFR provides storage for Federal Tax Information (FTI) data needed by VBA users to support claims processing. Authorized users can select the FTI Documents button from Claim Evidence to view the FTI Documents page, which provides access to documents stored in the FFR.

VBMS Fiduciary - The VBMS-Fiduciary application enables the Fiduciary Program to expedite qualifications, appointments of fiduciaries, and release withheld VA funds to beneficiaries. It provides a more effective means for the VA to meet its mission of oversight and protection of our Veterans and their survivors to provide fiduciary

appointments, reduction of accounting disapproval rates, and the ability to manage workload, oversight, and reporting. VBMS-Fiduciary provides increased automation and communication with other applications that are necessary to provide comprehensive functionality to Fiduciary Program customers.

Veteran Deployment Services (VETDEP) - The Veteran Deployment Service stores data around the deployment of Veterans and awards received by that Veteran related to PACT Act deployments. This data is received from VADIR (Veteran Affairs DoD Identity Repository) and PA&I (Performance Analysis & Integrity). The Veteran Deployment Service has an AWS DMS (Database Migration Service) feed to the PA&I tables to pull that data. The deployment and award information includes participant IDs, locations, dates, and award name. This data is stored to serve it to VBMS Core (PACT Act Deployment section) for filtering and display on the Veteran's Military Service page.

Records Research Center (RRC) - RRC is an application that supports the research and validation of a claim of disability related to stressors (ex. Post-traumatic Stress Disorder (PTSD)) and herbicide exposures (ex. Agent Orange). During claim intake and development, the Veteran provides information relative to the date, location, and details in which the stressor or exposure related incident(s) occurred. This information must be validated in order to proceed with claims processing. The RRC feature provides the functionality to support submission of a request, manage the request workload, and capture the findings of the research with the Veterans Benefits Management System (VBMS) application.

CFAPI VA External System Reference:

ILER (Individual Longitudinal Exposure Record) System DoD (Department of Defense) - CFAPI receives a HTTP Payload from external DoD ILER application to send to GenStore.

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

Yes

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?*

CFAPI is hosted on the Benefits Integration Platform (BIP) which resides on the VAEC (Veterans Administration Enterprise Cloud) Amazon Web Services (AWS) GovCloud, which are cloud platforms that offers several on-demand operations and therefore has no issues with synchronization.

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

    H. What is the citation of the legal authority?

- 5 U.S.C. § 552a, Freedom of Information Act of 1996, As Amended By Public Law No. 104--- 231, 110 Stat. 3048
- 5 U.S.C. § 552a, Privacy Act of 1974, As Amended
- Public Law 100---503, Computer Matching and Privacy Act of 1988
- Privacy Act of 1974; U.S Code title 5 USC section 301 title 38 section 1705, 1717, 2306-2308 & Title38, US Code section 7301 (a) and Executive Order 9397
- OMB Circular A---130, Management of Federal Information Resources, 1996
- OMB Memo M---03---22, OMB Guidance for Implementing the Privacy Provisions
- OMB Memo M---07---16, Safeguarding Against and Responding to the Breach of PII
- The Health Insurance Portability and Accountability Act of 1996 (HIPAA) •
- State Privacy Laws
- The legal authority is 38 U.S.C 7601-7604 and U.S.C 7681-7683 and Executive Order 9397
- System of Record Notice (SORN): 58VA21/22/28, VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA (November 8, 2021). This SORN can be found online at https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.pdf

    I. What is the SORN?

A System of Records Notice (SORN) is a public notice that describes how a federal agency collects, maintains, and uses Personally Identifiable Information (PII). System of Record Notice (SORN): 58VA21/22/28, VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA (November 8, 2021). This SORN can be found online at https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.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.

No amendments or revisions to the SORN are required.

4. System Changes

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

☐ Yes
☒ No
if yes, <<ADD ANSWER HERE>>

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

☐ Yes
☒ No
if yes, <<ADD ANSWER HERE>>

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:

☒ Name	☐ Address	☐ Health Insurance
☒ **Full** Social Security Number	☒ Personal Phone Number(s)	Beneficiary Numbers
☐ **Partial** Social Security Number	☐ Personal Fax Number	Account Numbers
☒ Date of Birth	☒ Personal Email Address	☐ Certificate/License
☐ Mother's Maiden Name	☐ Emergency Contact Information (Name, Phone Number, etc. of a Different Individual)	
☒ Personal Mailing	☒ Financial Information	

    Numbers[1]
- ☐ Vehicle License Plate Number
- ☐ Internet Protocol (IP) Address Numbers
- ☐ Medications
- ☐ Medical Records
- ☐ Race/Ethnicity
- ☐ Tax Identification Number
- ☐ Medical Record Number

- ☒ Sex
- ☒ Integrated Control Number (ICN)
- ☒ Military History/Service Connection
- ☐ Next of Kin
- ☒ Date of Death
- ☐ Business Email Address
- ☐ Electronic Data Interchange Personal Identifier (EDIPI)

- ☒ Other Data Elements (List Below)

Other PII/PHI data elements: Benefit Information, Claims Decisions, Participant ID, Individual Longitudinal Exposure Record (ILER), Individual Exposure Summary (IES)

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?

Corporate Database (CorpDB)- Is the system of record for Veteran information.

Compensation and Pension User Interface (CPUI) components:

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

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ILER (Individual Longitudinal Exposure Record) System DoD (Department of Defense) - CFAPI receives a HTTP Payload from external DoD ILER application to send to GenStore.

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.

CFAPI provides applications residing within the Benefits Integration Platform (BIP) a programmatic interface for Create Read Update and Delete (CRUD) operations for Veteran profile, notes and claims data. CFAPI is a generic, abstract namespace used to house API components that may interact with one or more other functional components in BIP tenants but that do not necessarily interact functionally with each other.

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

CFAPI uses the listed application above to access this data to provide BIP tenants with access for purposes of creating, reading and updating this information as it relates to processing and handling of claims.

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 electronically received and updated data via Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange.

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?

Information is not collected on a form.

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.

Accuracy checking of this information is currently happening through the Master Person Index (MPI) service as they can correlate information from multiple separate systems (Corp/IBS/VAProfile/VADIR/etc). This is done on an ad hoc basis and during MPI queries they will return information denoting if there is conflicting information or catastrophic edits.

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?

No, a commercial aggregator is not used MPI is a VA service.

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

- 5 U.S.C. § 552a, Freedom of Information Act of 1996, As Amended By Public Law No. 104--- 231, 110 Stat. 3048
- 5 U.S.C. § 552a, Privacy Act of 1974, As Amended
- Public Law 100---503, Computer Matching and Privacy Act of 1988
- Privacy Act of 1974; U.S Code title 5 USC section 301 title 38 section 1705, 1717, 2306-2308 & Title38, US Code section 7301 (a) and Executive Order 9397
- OMB Circular A---130, Management of Federal Information Resources, 1996
- OMB Memo M---03---22, OMB Guidance for Implementing the Privacy Provisions
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- System of Record Notice (SORN): 58VA21/22/28, VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA (November 8, 2021). This SORN can be found online at https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.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: System being compromised, and data stolen.

Mitigation: The system uses strong security controls. The Department of Veterans Affairs applies consistent security guidance to centralize and standardize account management, network access control, database security, vulnerability scanning and remediation.

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	Confirm Veteran's identity	Not used
Address	Confirm Veteran's address	Not used
Date of Birth (DoB)	Confirm Veteran's identity	Not used
Date of Death (DoD)	Confirm Veteran's address	Not used
Social Security Number (SSN)	Verify Veteran's identity and as a file number for the Veteran	Not used
Phone	Used for contacting the Veteran	Not used
Sex	Confirm Veteran's identity	Not used
Email	Used for contacting the Veteran	Not used
Financial Information	Determine benefits eligibility	Not used
Benefit Information	Confirm Veteran's benefits	Not used
Claims Decisions	Determine Veteran's benefits	Not used
Participant ID	Confirm Veteran's benefits	Not used
Integration control number (ICN)	Confirm Veteran's identity	Not used
Military History/Service Connection	Determine benefits eligibility	Not used

Individual Longitudinal Exposure Record (ILER)	Record of Veteran's Medical Conditions	Record of Veteran's Medical Conditions
Individual Exposure Summary (IES)	Record of Veteran's Medical Conditions	Record of Veteran's Medical Conditions

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?

> This system does not perform this action.

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.

> This system does not perform this action.

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?

> Data is stored in VAEC AWS GovCloud where Industry standard encryptions are present for both in transit and at rest information.

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 requests require Secure Socket Layer (SSL) encryption and a JWT (JSON Web Token).

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

Data is stored in a secure enclave within VAEC AWS GovCloud. Access to information is protected by industry standard authentication and authorization protocols. Data is encrypted both in transit and at rest via SSL/TLS (Transport Layer Security).

2.4 <u>PRIVACY IMPACT ASSESSMENT: Use of the information.</u>

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:

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

<u>*Principle of Use Limitation:*</u> *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?

The SORN defines the information collected from Veterans, use of the information, and how the information is accessed and stored.

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?

Yes, these are document in security control policies like an AC Policy which is kept in VA eMASS.

2.4c Does access require manager approval?

Yes

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

Yes

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

The Platform Accelerator teams control the security safeguards that are in all applications that use the Benefits Integration Platform (BIP) framework.

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
- Address
- Date of Birth (DoB)
- Date of Death (DoD)
- Social Security Number (SSN)
- Phone
- Sex
- Email
- Financial Information
- Benefit Information
- Claims Decisions
- Participant ID
- Integration control number (ICN)
- Military History/Service Connection
- Individual Longitudinal Exposure Record (ILER)
- Individual Exposure Summary (IES)

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.

Data is maintained in accordance with VA data retention policies in accordance with NARA retention schedule. Most routine material for Claims is destroyed after 2 years, but items in the Veteran's Claims Folders the disposition is to retain in active file. Depending on the type of data one would have to refer to the VBA records control schedule document to know how long it is retained.

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

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

> VBA Records Management, Records Control Schedule VB-1, Part 1, Section VII as authorized by NARA
> https://www.benefits.va.gov/WARMS/docs/regs/RCS_I.doc

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.

> Electronic data and files of any type, including PHI, SPI, Human Resources records, and more are destroyed in accordance with the Media Sanitization section of the VA Directive 6500 VA Cybersecurity Program (February 24, 2021) and are compliant with NIST SP 800-88. When required, this data is deleted from their file location and then permanently deleted from the deleted items or Recycle Bin. Magnetic media is wiped and sent out for destruction. Digital media is shredded or sent out for destruction.

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.

> Veteran PII is not used for research, testing, or training.

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 any information retained for longer than required holds an increased risk of breach, theft, or loss. The impact to an individual whose data has been unintentionally released can include identity fraud, financial loss, and emotional distress.

Mitigation: Data is maintained only for as long as required per records retentions listed in 3.3b. Furthermore, controlled access to the data is maintained at all times. Only those personnel required by job assignment have access to the data. Each employee with access to the data is required to attend data privacy training.

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 **CFAPI** consists of **one** key components (severs/databases). Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected by **CFAPI** 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
Corporate Database (CorpDB)	Yes	Yes	• Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone • Sex • Email • Financial Information • Benefit Information • Claims Decisions • Participant ID • Integration control number (ICN) • Military History/Service Connection • Individual Longitudinal	Confirmation and verification of Veterans Identify and other relative information.	Encryption at rest, encryption in transit using SSL encryption and certificate exchange.

| | | | Exposure Record (ILER) • Individual Exposure Summary (IES) | | |
| | | | | | |

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

IT system and/or Program office. Information is shared/received with	*List the purpose of the information being shared /received with the specified program office or IT system*	*List PII/PHI data elements shared/received/transmitted.*	*Describe the method of transmittal*
Corporate Database (CorpDB)	Is the system of record for Veteran information.	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security	Representational State Representational State Transfer (REST) over HTTPS using SSL encryption

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
		Number (SSN) • Phone • Sex • Email • Financial Information • Benefit Information • Claims Decisions • Participant ID • Integration control number (ICN) • Military History/Service Connection • ILER • IES	and certificate exchange through Benefits Enterprise Platform (BEP) Services
Compensation and Pension User Interface (CPUI) components: <u>Interactive</u> Development Assist Banner (IDB) shown as Outstanding Development Actions (ODAs) User Interface (UI), Veteran Summary Panel (VSP) UI, Veteran Service Treatment Records (STR) Assist UI, IDA Admin UI	Interactive Development Assist Banner (IDB) shown as Outstanding Development Actions (ODAs) User Interface (UI) - View messages on the Outstanding Development Actions banner on the Claim Details page in VBMS-Core and select links to navigate to other pages in VBMS-Core where actions can be resolved. Veteran Summary Panel (VSP) UI - Veteran Summary Panel UI allows users to access a variety of information about the Veteran whose documents are in view.	• Benefit Information • Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	Veteran Service Treatment Records (STR) Assist UI - STR Assist UI is the STR Requests page in VBMS Core. IDA Admin UI - STR Assist UI is the STR Requests page in VBMS Core.		
Benefits Integration Platform (BIP) component: Confluent	Confluent is an open-source distributed event streaming platform built on Apache Kafka. Kafka acts as a distributed, fault-tolerant, and scalable commit log, providing a unified platform for building real-time data pipelines. This is achieved through the use of Kafka Brokers, which are responsible for storing and managing the streams of records, referred to in the architecture as "topics." Through the use of the various pieces of the platform, Confluent is able to build event-driven applications, and create universal data pipelines of historical and real-time data.	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone • Sex • Email • Financial Information • Benefit Information • Claims Decisions • Participant ID • Integration control number (ICN) • Military History/Service Connection	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
Document Generator (DocGen) components: Letters	Letters Service calls DocGen Service to build a list of letters that can be generated	• First Name • Last Name • Address	Representational State Transfer (REST) over HTTPS using

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
Service, GenStore Service	and an interview screen for a given letter. It also calls data services upon user preview or finalize to collect data identified in the letter definition. DocGen GenStore Service is an orchestration service used to coordinate the generation and storage of documents, as well as manage retrieval of documents that have been previously stored. This includes the coordination of locally stored documents used for preview, and permanent storage in Claim Evidence/eFolder for finalized or completed documents.	• Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone • Sex • Email • Financial Information • Benefit Information • Claims Decisions • Participant ID • Integration control number (ICN) • Military History/Service Connection	SSL encryption and certificate exchange
Veteran Enterprise File Storage (VEFS) - Claim Evidence	Claim Evidence - Claim Evidence is a file service for handling the storage and management of files supporting VA benefit claims. It serves as a modernized point of entry to files previously only accessible through VBMS eFolder. It is designed for easier implementation by consuming systems, but also with the ability to replace the eFolder logic within	• Benefit Information • Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	VBMS. The Claim Evidence UI has replaced the functionality of the VBMS eFolder/Documents UI.		
Benefits Integration and Administration - Benefits Services (BIA-BS) component: Claims API	The Claims API provides a mechanism to create and view claims, as well as create, view, and delete contentions.	• Benefit Information • Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
VA Master Person Index (VA MPI)	VA MPI is ingested into VBMS for reporting, analysis and data correlation of veterans identity across the VA enterprise.	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone • Sex • Email • Participant ID • Integration control number (ICN) • Military History/Service Connection	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
Benefits Enterprise Platform (BEP) Services	BEP Services provide information flow to and from the VBA Corporate Database (CRP) and client systems, both internal and external to VA, for the purpose of processing Veteran benefits.	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
		- Sex - Email - Financial Information - Benefit Information - Claims Decisions - Participant ID - Integration control number (ICN) - Military History/Service Connection	
VBMS (Veteran Benefits Management System) Ratings (VBMS-R)	VBMS-R allows rating specialists to rate a case, determining the extent of disability and recommending a disability benefit.	- Benefit Information - Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
VBMS Core (VBMSCORE)	VBMSCORE is a component of VBMS used to create and develop a Veteran's claim. It is the primary maintenance center for Veteran Service Representatives (VSRs). Core also includes the National Work Queue (NWQ) application.	- Benefit Information - Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
Claim Establishment (CEST)	The purpose of VBMS Claim Establishment (CEST) is to handle performing the same claim establishment processes that currently live in VBMS Core within BIP. This includes both the modernized user interface and	- Benefit Information - Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	backend processes that occur. In addition to the existing processes in Core, we will be adding the capability to establish Decision Reviews (030, 040, 930) claims.		
Work Queue (WORKQ)	WORKQ is a replacement for legacy capability originally built inside of VBMS Core that supported the viewing, routing, assignment, and brokering of work items. It extracts the logical elements of the legacy application within VBMS and restructures them as a standalone application for use both in updated VBMS capabilities as well as new capabilities requiring access to work item events. It contains two functional areas, National Work Queue (NWQ) and Work Queue, as well as shared architectural components.	• Benefit Information • Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
Package Manager (PacMan)	PacMan provides the ability to create "packages" of documents to be sent to a Veteran or a 3rd party representative. Packages are created in PacMan and sent for distribution by the	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN)	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	VA's Centralized Benefits Communications Management (CBCM) system. PacMan is a capability that processes package distribution events from Veteran's Benefits Management System (VBMS) which resides on the Benefits Integrated Platform. These distribution events are sent to the CBCM system which routes them to the appropriate vendor for fulfillment and delivery of documents.	- Phone - Sex - Email - Financial Information - Benefit Information - Claims Decisions - Participant ID - Integration control number (ICN) - Military History/Service Connection	
Federal Tax Information File Repository (FTI-FFR)	FFR provides storage for Federal Tax Information (FTI) data needed by VBA users to support claims processing. Authorized users can select the FTI Documents button from Claim Evidence to view the FTI Documents page, which provides access to documents stored in the FFR.	- First Name - Last Name - Address - Social Security Number (SSN) - Financial Information	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange
VBMS Fiduciary	The VBMS-Fiduciary application enables the Fiduciary Program to expedite qualifications, appointments of fiduciaries, and release withheld VA funds to beneficiaries. It	- First Name - Last Name - Address - Social Security Number (SSN) - Financial Information	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	provides a more effective means for the VA to meet its mission of oversight and protection of our Veterans and their survivors to provide fiduciary appointments, reduction of accounting disapproval rates, and the ability to manage workload, oversight, and reporting. VBMS-Fiduciary provides increased automation and communication with other applications that are necessary to provide comprehensive functionality to Fiduciary Program customers.	• Benefit Information • Claims Decisions	
Veteran Deployment Services (VETDEP)	The Veteran Deployment Service stores data around the deployment of Veterans and awards received by that Veteran related to PACT Act deployments. This data is received from VADIR (Veteran Affairs DoD Identity Repository) and PA&I (Performance Analysis & Integrity). The Veteran Deployment Service has an AWS DMS (Database Migration Service)	• First Name • Last Name • Address • Date of Birth (DoB) • Date of Death (DoD) • Social Security Number (SSN) • Phone • Sex • Email • Financial Information • Benefit Information • Claims Decisions • Participant ID • Integration control	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	feed to the PA&I tables to pull that data. The deployment and award information includes participant IDs, locations, dates, and award name. This data is stored to serve it to VBMS Core (PACT Act Deployment section) for filtering and display on the Veteran's Military Service page.	number (ICN) • Military History/Service Connection	
Records Research Center (RRC)	RRC is an application that supports the research and validation of a claim of disability related to stressors (ex. Post-traumatic Stress Disorder (PTSD)) and herbicide exposures (ex. Agent Orange). During claim intake and development, the Veteran provides information relative to the date, location, and details in which the stressor or exposure related incident(s) occurred. This information must be validated in order to proceed with claims processing. The RRC feature provides the functionality to support submission of a request, manage the request workload, and capture the findings of	• Benefit Information • Claims Decisions	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

IT system and/or Program office. Information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List PII/PHI data elements shared/received/transmitted.	Describe the method of transmittal
	the research with the Veterans Benefits Management System (VBMS) application.		

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: The privacy risk associated with maintaining SPI is that this data may be disclosed to individuals who do not require access, which would increase the risk of the information being misused.

Mitigation: Safeguards are implemented to ensure data is not sent to unauthorized VA employees, including employee security and privacy training, and required reporting of suspicious activity. Use of secure passwords, access for need-to-know basis, Personal Identification Verification (PIV) Cards, Personal Identification Numbers (PIN), encryption, and access authorization are all measures that are utilized for the system.

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

List IT System or External Program Office information is shared/received with	*List the purpose of information being shared / received / transmitted*	*List the specific PII/PHI data elements that are processed (shared/received/transmitted)*	*List agreements such as: Contracts, MOU/ISA, BAA, SORN. etc. that permit external sharing (can be more than one)*	*List the method of transmission and the measures in place to secure data*
ILER (Individual Longitudinal Exposure Record) System DoD (Department of Defense)	CFAPI receives a HTTP Payload from external DoD ILER application to send to GenStore.	• ILER • IES	MOU-ISA (this document belongs to BIP)	Representational State Transfer (REST) over HTTPS using SSL encryption and certificate exchange

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: PII, including personal contact, service, and benefits information could be released to unauthorized individuals. Additionally, misspelling a Veteran's name could result in the wrong data being displayed to the user.

Mitigation: Outside agencies provide their own level of security controls such as access control, authentication, and user logs in order to prevent unauthorized access. The ISA/MOUs between BIP and external agencies establish the security requirements for the VA and the external agency. The VA and external systems are protected by the Moderate system certification level which ensures criticality defined by FIPS 199. The authorization process is completed for CFAPI and external agencies, and an Authority to Operate (ATO) has been approved. The security controls identified by NIST SP 800-53 for a moderate system are implemented to protect BIP and external agencies.

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.

> This notice is provided by the SORN for better understanding to the reader.
> The System of Record Notice (SORN) as listed in the Federal Register:
> 58VA21/22/28, *Compensation, Pension, Education, and Rehabilitation Records- VA*
> https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.pdf

6.1b If notice was not provided, explain why.

This notice is provided by the SORN.

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

The Department of Veterans Affairs provides public notice that the system exists in two ways:
1. The System of Record Notice listed in the Federal Register: a. "VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA" 58VA21/22/28 (November 8, 2021). This SORN can be found online at https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021- 24372.pdf
2. This Privacy Impact Assessment (PIA) also serves as notice as required by the eGovernment Act of 2002, Pub.L. 107–347 §208(b)(1)(B)(iii), the Department of Veterans Affairs "after completion of the [PIA] under clause (ii), make the privacy impact assessment publicly available through the website of the agency, publication in the Federal Register, or other means."

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.

Individuals have the right to decline providing information to VA personnel. However, failure to provide information may result in denial of access to claims for health care benefits, and various other benefits. Veterans and their family or guardian (spouse, children, parents, grandparents, etc.) cannot decline their information from being included to determine eligibility and entitlement for VA compensation and pension benefits and also designate a guardian to manage the VA compensation and pension benefits.

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.

While individuals may have the ability to consent to various uses of their information at the VA, they are not required to consent to the use of their information to determine eligibility and entitlement for VA compensation and pension benefits. The Privacy Act and VA policy require that PII information only be used for the purpose(s) for which it was collected unless consent (opt-in) is granted. Individuals must be provided an opportunity to provide consent for any secondary use of information such as use of collected information for marketing.

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 of insufficient/irrelevant PII/PHI being collected.

Mitigation: The VA mitigates this risk by providing two forms of notice, as identified in Section 6.1, including the System of Record Notice and Privacy Act statement.

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.

Individuals wishing to determine whether a record is being maintained under his/her name in Work Queue or wishes to determine the contents of a record in question, should communicate with the VA Facility where the record is located. This can be done in a written request or by applying in person. For a directory of VA facilities and phone numbers by region see,
https://www.benefits.va.gov/benefits/offices.asp

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)?

This system is not exempt from the privacy act.

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?

This system follows Privacy Act procedures and regulations.

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.

Those wishing to obtain more information about access, redress, and record correction of Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records, should contact the VA Regional Office as directed in the System of Record Notice (SORN) "VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA 58VA21/22/28 - Compensation, Pension, Education and Vocational Rehabilitation and Employment Records VA
https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.pdf

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.

> Those wishing to obtain more information about access, redress, and record correction of Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records, should contact the VA Regional Office as directed in the System of Record Notice (SORN) "VA Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA 58VA21/22/28 - Compensation, Pension, Education and Vocational Rehabilitation and Employment Records VA https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.pdf

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

Veterans and other beneficiaries may contact their supporting VA regional office or VHA center to learn how to access, correct, or contest their information.

7.5 <u>PRIVACY IMPACT ASSESSMENT: Access, redress, and correction</u>

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

<u>Principle of Individual Participation:</u> 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.

<u>Principle of Individual Participation:</u> 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: Individuals may seek to access or redress their records held by the VA Office and risk that their claim will not be processed correctly.

Mitigation: By publishing this PIA and the applicable SORN, the VA makes the public aware of the unique status of applications and evidence files. Furthermore, this document and the SORN provide the point of contact for members of the public who have questions or concerns about applications and evidence files.

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?

> Access is requested utilizing the BIP Operations Service Desk. The BIP Operations Service Desk is for requesting user access to BID (Benefits Integrated Delivery)/BIA (Benefits Integration and Administration)/BIP (Benefits Integration Platform). Supervisor, Contracting Officer Representative (COR), Information System Owner (ISO) and Office of Information and Technology (OIT) approval must be obtained prior to access being granted. These requests are submitted for VA employees, contractors and all outside agency requests and are processed through the appropriate approval processes. Once access is granted, individuals can log into the system(s) through dual authentication, i.e., a PIV card with a complex password combination (two-factor authentication is enforced). Once inside the system, individuals are authorized to access information on a need-to-know basis.

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?

> Only VA Employees and Contractors have access to the system.

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.

> There are End-User, Admin, and Read-Only roles for this system.

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?

> The contractors are under contract for this work and under non-disclosure agreement as well as other contract specific non-disclosure agreement.

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

> Yes, but only in the production environment.

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

> Yes, contractors will have access to design and maintenance of CFAPI.

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.

> Personnel that will be accessing information systems must read and acknowledge their receipt and acceptance of the VA National Rules of Behavior (ROB) or VA Contractor's ROB prior to gaining access to any VA information system or sensitive information. The rules are included as part of the security awareness training that all personnel must complete via the VA's Talent Management System 2.0 (TMS). After the user's initial acceptance of the Rules, the user must re-affirm their acceptance annually as part of the privacy and security awareness training. Acceptance is obtained via electronic acknowledgment and is tracked through the TMS 2.0 system.

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

8.4a If completed, provide:

1. *The Security Plan Status:* Approved
2. *The System Security Plan Status Date:* 10/11/2024

3. *The Authorization Status:* Approved >>
4. *The Authorization Date:* 11/20/2023
5. *The Authorization Termination Date:* 11/20/2026
6. *The Risk Review Completion Date:* 09/10/2024
7. *The FIPS 199 classification of the system (LOW/MODERATE/HIGH):* Moderate

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.***

> This system has an Assess Only ATO approval.

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)

> Yes, the system is a Software as a Service (SaaS) hosted on Benefits Integration Platform (BIP) which is hosted in the VA Enterprise Cloud (VAEC) Amazon Web Services (AWS).

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.*

> The VA maintains ownership of the data, and selects which services can process, store, and host data. The CSP does not access or use the data for any purpose without agreement from the VA. VAEC determines where the data will be stored, including the type of storage and geographic region of that storage. VAEC manages access to its data, and access to services and resources through users, groups, permissions, and credentials that are internally controlled. VAEC chooses the secured state of the data. The CSP provides encryption features that protect data in transit and at rest and provides VAEC with the option to manage their encryption keys. VAEC AWS Enterprise Cloud Capacity Contract - NNG15SD22B VA118-17-F-2284.

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.

The CSPs automatically collect metrics, such as offering usage, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs. VAEC is the owner of its data (customer data). The CSP does not use customer data and has anonymized metrics to help them measure, support, and improve their services. The CSP has ownership of these anonymized metrics.

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.

Each application in the VAEC is responsible for their data. For all cloud deployment types, the customer owns their data and identities. The customer is responsible for protecting the security of their data and identities, on-premises resources, and the cloud components they control (which varies by service type). This is the Shared Responsibility Model for Security in the 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).

CFAPI does not use Robotics Process Automation (RPA).

Section 10. References

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, Marvis Harvey

_____

Information System Security Officer, Thomas Wolf

_____

Information System Owner, Mycal Brown

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).

58VA21/22/28: Compensation, Pension, Education, and Rehabilitation Records- VA, https://www.govinfo.gov/content/pkg/FR-2021-11-08/pdf/2021-24372.pdf

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)