

Privacy Impact Assessment for the VA IT System called:

Data Migration and Management (DMM) Electronic Health Records Modernization VA Central Office eMASS ID 2025

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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 DMM (VistA eXtract of 130 VAMCs) mechanism funnels the data from all VistA nationwide systems to the Veterans Health Administration (VHA) Data Migration and Management (DMM). The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels.

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 DMM system houses a mirror copy of 25 million individual Veterans medical records. The system contains PII and PHI data and is collected for the Electronic Health Records Management systems of the Veterans Administration and Department of Defense. The Data Migration and Management system sends data to Oracle for integration into the Oracle Health Data Intelligence Platform and populates the Corporate Data Warehouse.

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.

Veterans Administration Owned and Operated

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?

25 million. Veterans currently or previously in the care of the Veterans Health Administration.

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?

Data Migration and Management VA VistA data is transmitted via an API connection to the Oracle Health Data Intelligence Platform for consumption by HealtheIntent and Millennium, components of the new VA Electronic Health Record Modernization (EHRM). Data syndication is capturing the returning data from the Oracle EHR and merging it with other VA data to be used for reporting and analytic platforms.

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

The system operates out of the Austin Information Technology Center, there is also a mirror in Microsoft Azure Government. The system maintains a duplicate of the onsite databases at the remote site in the cloud. The data is encrypted in transit and at rest at all sites

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

This is correct, as DMM needs the subsystems to duplicate the DATA store within its systems.

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?

The system operates out of the Austin Information Technology Center, there is also a mirror in Microsoft Azure Government. The system maintains a duplicate of the onsite databases at the remote site in the cloud. The data is encrypted in transit and at rest at all sites

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

H.	What	is	the	citation	of the	lega	l authorit	ν?
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The Privacy Act of 1974, as amended, 5 U.S.C. § 552a, establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals that is maintained in systems of records by federal agencies. The authority of maintenance of the system listed in question 1.1 falls under Title 28, United States Code, title 38, U.S.C., sections 501(a), 1705, 1710, 1722, and 5317.

I. What is the SORN?

79VA10/85 FR 84114 Veterans Health Information Systems and Technology Architecture (VistA) Records-VA

https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28340.pdf

The authority listed in this SORN is Under the authority of Title 38, United States Code, section 7301(a).

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

79VA10, Veterans Health Information Systems and Technology Architecture (VistA) Records-VA https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/202028340.pdf. The SORN will not require amendment or revision.

4. System Changes

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 Name	☐ Financial Information	Number (ICN)
▼ Full Social Security		☐ Military History/Service
Number	Beneficiary Numbers	Connection
☑ Partial Social Security	Account Numbers	Next of Kin
Number	☑ Certificate/License	☐ Date of Death
☑ Date of Birth	Numbers ¹	☐ Business Email Address
☑ Mother's Maiden	☐ Vehicle License Plate	☐ Electronic Data
Name	Number	Interchange Personal
☑ Personal Mailing	☐ Internet Protocol (IP)	Identifier (EDIPI)
Address	Address Numbers	☑ Other Data Elements
☑ Personal Phone		(List Below)
Number(s)	☑ Medical Records	
□ Personal Fax Number	☑ Race/Ethnicity	
☑ Personal Email Address	☐ Tax Identification	
	Number	
Information (Name,		
Phone Number, etc. of a	⊠ Sex	
Different Individual)	☐ Integrated Control	
Health Insurance		

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?

The primary sources of DMM data are the VistA production databases via the VistA Shadow server process.

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.

The primary sources of DMM data are the VistA production databases via the VistA Shadow server process.

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

The system does not create information

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?

DMM collects data from the VistA Shadow Servers. This data is transferred to DMM via the Enterprise Connection Protocol (ECP).

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?

DMM does not use a form in the collection of data

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.

The DMM implements data integrity checking using InterSystems IRIS software to check data to ensure VistA data reflects the values stored in the source systems. DMM Data Quality (DQ) tools are used on a daily basis to compare the data between a site's VistA Shadow and the DMM databases, fix unreconciled records, and report anomalies so that they can be addressed.

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?

The DMM implements data integrity checking using InterSystems Datacheck to ensure VistA data reflects the values stored in the source systems. DMM Data Quality (DQ) tools are used on a daily basis to compare the data between a site's VistA Shadow and the DMM databases, fix unreconciled records, and report anomalies so that they can be addressed. The Data Quality checks are run using Docker containers that create an ECP connection to a VistA shadow site and to the DMM mirror. The DQ check is run in a VA Docker container. The containers are managed using Portainer which is an open-source container management tool that works with the Docker Platform.

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 Privacy Act of 1974, as amended, 5 U.S.C. § 552a, establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals that is maintained in systems of records by federal agencies. The authority of maintenance of the system listed in question 1.1 falls under Title 28, United States Code, title 38, U.S.C., sections 501(a), 1705, 1710, 1722, and 5317.

The SORN assigned is 79VA10/85FR84114 and This falls and is required under the Privacy Act of 1974. 1

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:

<u>Principle of Purpose Specification:</u> The collection ties with the purpose of the underlying mission of the organization and its enabling authority.

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

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

<u>Principle of Data Quality and Integrity:</u> 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:

<u>Privacy Risk:</u> The Privacy risk may occur when the data may become corrupted or incorrect.

<u>Mitigation:</u> We run routine Datacheck and integrity checks against all our databases. DMM storage is encrypted at the hardware level at both the AITC, and Microsoft Azure Government. In addition, all mirror traffic is encrypted in transit.

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.

DMM extracts data from all Vista instances and moves it quickly and continuously into the CDW (Corporate Data Warehouse) and the Oracle Health Data Intelligence Platform, keeping the data from all 130 VistA EHR instances synchronized for later ingestion into the Oracle Health Data Intelligence Platform. This data is used to support health care operations. DMM forms an enterprise data platform upon which many activities can be built., including (but not limited to) APIs, applications, dashboards, and reports generated from database queries. The data in the combined repository is then available for use by data analysts, researchers, and others in the cloud.

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?

DMM uses many different application software to process the data for ingestion into Oracle. This includes InterSystems IRIS, Ensemble, and SQL.Once the data is in Caché/IRIS class form, DMM can output it in a variety of formats, including XML, JSON, text or CSV. With the support of Open Database Connectivity (ODBC) / Java Database Connectivity (JDBC), the data output by DMM is available for querying and reporting by hundreds of common tools. These connections also enable data to be transformed into specific healthcare formats (such as HL7, FHIR, and X13) using InterSystems Ensemble/HealthShare/Health Connect.

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.

The system does not generate newly derived information

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?

The DMM data is encrypted at rest and in transit using SHA-256 Encryption.

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 DMM data is encrypted at rest and in transmission while replicating to the mirrors, using TLS 1.2. For data at rest, DMM uses infrastructure encryption using platform-managed keys, as well as MACsec and hardware security devices as it traverses the TIC. Access to DMM data is determined by views so that only authorized users can see certain data elements and users must be approved by National Data Systems (NDS)

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

Primary systems are located at the Austin Information Technology Center, which is a secure facility requiring a background check for access. Systems in Azure are in the GovCloud environment. All personnel with access to the data must complete the Rules of Behavior training, the Privacy and HIPAA Training, and must also submit an elevated privileges access request for the systems which must be approved by the System Owner.

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:

<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?

DMM uses VA Active Directory user provisioning process to provide access to our systems. Any user requiring access must submit an elevated privileges request that must be approved by the System Owner.

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, criteria, procedures, controls, and responsibilities regarding access are documented in the DMM Account Management SOP document maintained on our File server share.

2.4c Does access require manager approval?

Access does require manager approval

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

The system tracks and records the access to the application which contains PII data.

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

The System Owner is responsible for assuring safeguards for the PII.

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

All data loaded in DMM is retained and stored at the AITC, Oracle and in Microsoft Azure Government environments. Data elements are Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, current medications, previous medical records, race/ethnicity, medical record number, sex

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

Records are maintained in accordance with VHA RCS 10-1 section 1100.38. Unscheduled VISTA associated records needed to perform various business duties. Retained indefinitely.

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?

DMM uses VHA RCS 10-1 section 1100.38.VHA Records Control Schedule 10-1: https://vaww.va.gov/vhapublications/rcs10/rcs10-1.pdf

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.

Records are maintained in accordance with VHA RCS 10-1 section 1100.38. Unscheduled VISTA associated records needed to perform various business duties. Retained indefinitely. Electronic data and files of any type, including Protected Health Information (PHI), Sensitive Personal Information (SPI), Human Resources records, and more are destroyed in accordance with VA Directive 6500 VA Cybersecurity Program (February 24, 2021) and VA Handbook 6500.1 Electronic Media Sanitization. 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. https://www.va.gov/vapubs/search_action.cfm?dType=1

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 research, testing and training use, data remains hosted on encrypted storage arrays, which limit access unless personnel are given specific permissions which must be approved by the System Owner.

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:

<u>Principle of Minimization:</u> 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.

<u>Principle of Data Quality and Integrity:</u> 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:

<u>Privacy Risk:</u> Data may be exposed when retained beyond what is necessary.

<u>Mitigation:</u> These measures 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.

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 (Servers/Database)

Data Migration and Management consists of 21 key components (databases). Each component has been analyzed to determine if any elements of that component collect PII. The type of PII collected by Data Migration and Management 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 the server names in the table.

Internal Database Connections

Database Name of the information system collecting/storing PII	Does this system collect PII? (Yes/No)	Does this system store PII? (Yes/No)	Type of PII (SSN, DOB, etc.)	Reason for Collection/ Storage of PII	Safeguards
DMM Server 1 - IRIS fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM Server 2 - IRIS			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM Server 3 - IRIS			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and	is limited to need to know.
				migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	
DMM Server 4 - IRIS fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM Server 5 - IRIS			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM Server 6 - IRIS			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM Server 7 - IRIS			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
fdwpriv fdw1-fdw68	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM SQL Server 1			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
B1930 BISL_MILL ETL ODS ODS30-ODS39	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM SQL Server 2			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
CSDE_BSV ETL ODS ODS01-ODS10 ODSDental	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

ODSEM ODSFCC ODSImport OEHRM_VEHRA SSISDB ValueXWalk VSSC_Out			number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system uses InterSystems Cache mirrors and multiple journal readers.	is limited to need to know.
ETL ODS ODSDental ODSEM ODSFCC	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

DMM SQL Server 4	Vac	Vac	number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	Access to
BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone	The DMM utility is designed to allow for full extraction of	Access to the system is restricted and access to specific information

CBOPC_CCODO	number, person		is limited to
CBOPC_COED	fax number,	from	need to
CBOPC_DAIC	personal email	specific sites	know.
CBOPC_Data	address, contac		
CBOPC_EPRS	information, ne		
CBOPC_FEE	of kin, emergen	•	
CBOPC_Fee_PIT	contact	Veterans	
CBOPC_FM	information,	Integrated	
CBOPC_NVCC	health insurance certificate/Lice		
CBOPC_OPS	numbers,		
CBOPC_OSD	medications,	(VISN), Regional, or	
CBOPC PA	medical records		
CBOPC_PC3	race/ethnicity,	levels. The	
	medical record	DMM	
CC_AET	number, sex	method	
CC_aetpp	namet, sen	involves	
CC_AMCMS		reading	
CC_AMCMS_ETL			
CC_AMCMS_FMS		journal files,	
CC_AuditRO		pattern	
CC_CBI		matching	
CC_CCDST		particular	
CC_CCNNC		data fields of	
CC_CIS		interest, and	
CC_ConsultsTB		then	
CC_CPACWFT		mi anatin a	
CC_DEV		migrating the	
CC_EMOProjects		identified	
CC_EPSI		fields to the	
CC EPSI PPRD		DMM	
CC_FMS		system. The	
CC_MCCFTAS		DMM	
CC_MLDS		system uses	
CC_PABSLC		InterSystems	
CC_PIE		Cache	
CC_PIE Dev		mirrors and	
		multiple	
CC_PIE_PPMS		journal	
CC_PIR		readers.	
CC_PIT			
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			

CC VEMP			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
CDW14			
CDW15			
CDW16			
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CDW18			
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CDW36			
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CDW40 CDW41			
CDW41 CDW42			
CDW42 CDW43			
CDW44			
CDW45			
CDW46			
CDW47			
CDW48			
CDW49			
CDWImport CDWImport			
CDWLocal			
CDWPriv			
CDVVFIIV			

CDWPriv03					
CDWPriv04					
CDWPriv05					
CDWPriv06					
CDWPriv2					
CDWWork					
CDWWork2					
CDWWork3					
CPAC_ChoiceIV					
DBATools					
DDSClient					
ETL					
IVC_CDS					
IVC_CIPH					
IVC_landl					
IVC_IIA					
IVC_ITD					
IVC_MCA					
LSV					
LSVMembership					
OIT_Lighthouse					
OIT_Lighthouse2					
OIT_RPA					
SPV					
SPV2					
SPV3					
SPVNext					
SPVNext2					
SPVNext3					
VHAHOC_Tier2					
VHAOCC_OCCDW					
VHAOCC_OCCDW_PPD					
VHIE_ISAnalytics					
VHIE_ISAnalytics_Dev					
VHIE_ISAnalytics_ETL					
XDW18_V22					
DMM SQL Server 5	X 7	X 7	N CCN	TI. DIAIA	A
BaseCamp_Support	Yes	Yes	Name, SSN, DOB, Mothers	The DMM utility is	Access to the system
BIO_BIS			maiden name,	designed to	is restricted
	<u>I</u>	I	maraon namo,	acoigned to	15 1550116004

DIOL COD		11 0	•
BISL_COP	personal mailing	allow for	and access
CBO_SHPD	address, zip code,	full	to specific
CBOP_Analytics	personal phone	extraction of	information
CBOPC_CCODO	number, personal	VistA data	is limited to
CBOPC_COED	fax number,	from	need to
CBOPC_DAIC	personal email	specific sites	know.
CBOPC_Data	address, contact	or to	
CBOPC EPRS	information, next	aggregate	
CBOPC_FEE	of kin, emergency contact	data at Veterans	
CBOPC_Fee_PIT	information,	Integrated	
CBOPC_FM	health insurance,	Service	
CBOPC_NVCC	certificate/License	Network	
CBOPC_NVCC	numbers,	(VISN),	
_	medications,	Regional, or	
CBOPC_OSD	medical records,	National	
CBOPC_PA	race/ethnicity,	levels. The	
CBOPC_PC3	medical record	DMM	
CC_AET	number, sex	method	
CC_aetpp	,	involves	
CC_AMCMS		reading	
CC_AMCMS_ETL		journal files,	
CC_AMCMS_FMS		journal mes,	
CC_AuditRO		pattern	
CC_CBI		matching	
CC_CCDST		particular	
CC_CCNNC		data fields of	
CC_CIS		interest, and	
CC_ConsultsTB		then	
CC_CPACWFT		migrating	
CC_DEV		the	
CC_EMOProjects		identified	
CC_EPSI		fields to the	
CC_EPSI_PPRD		DMM	
CC FMS		system. The	
CC MCCFTAS		DMM	
_		system uses	
CC_MLDS		InterSystems	
CC_PABSLC		Cache	
CC_PIE		mirrors and	
CC_PIE_Dev		multiple	
CC_PIE_PPMS		journal	
CC_PIR		readers.	
CC_PIT			
CC_POM			
CC_PRSNM			
CC_REFDOC			

CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
CDW14			
CDW15			
CDW16			
CDW17			
CDW18			
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CDWImport CDWLocal CDWPriv	
CDWPriv	
CDWPriv03	
CDWPriv04	
CDWPriv05	
CDWPriv06	
CDWPriv2	
CDWWork	
CDWWork2	
CDWWork3	
CPAC_ChoiceIV	
DBATools	
DDSClient	
ETL	
IVC_CDS	
IVC_CIPH	
IVC_landl	
IVC_IIA	
IVC_ITD	
IVC_MCA	
LSV	
LSVMembership	
OIT_Lighthouse	
OIT_Lighthouse2	
OIT_RPA	
SPV	
SPV2	
SPV3	
SPVNext	
SPVNext2	
SPVNext3	
VHAHOC_Tier2	
VHAOCC_OCCDW	
VHAOCC_OCCDW_PPD	
VHIE_ISAnalytics	
VHIE_ISAnalytics_Dev	
VHIE_ISAnalytics_ETL	
XDW18_V22	

DMM SQL Server 6					
	Yes	Yes	Name, SSN,	The DMM	Access to
BaseCamp_Support			DOB, Mothers	utility is	the system
BIO_BIS			maiden name,	designed to	is restricted
BISL_COP			personal mailing	allow for	and access
CBO_SHPD			address, zip code,	full	to specific
CBOP_Analytics			personal phone	extraction of	information
CBOPC_CCODO			number, personal	VistA data	is limited to
CBOPC_COED			fax number,	from	need to
CBOPC_DAIC			personal email	specific sites	know.
CBOPC_Data			address, contact	or to	
CBOPC_EPRS			information, next	aggregate	
CBOPC_FEE			of kin, emergency	data at	
CBOPC_Fee_PIT			contact	Veterans	
CBOPC_FM			information,	Integrated	
_			health insurance,	Service	
CBOPC_NVCC			certificate/License	Network	
CBOPC_OPS			numbers,	(VISN),	
CBOPC_OSD			medications,	Regional, or	
CBOPC_PA			medical records,	National levels. The	
CBOPC_PC3			race/ethnicity, medical record	DMM	
CC_AET			number, sex	method	
CC_aetpp			number, sex	involves	
CC_AMCMS				reading	
CC_AMCMS_ETL					
CC_AMCMS_FMS				journal files,	
CC_AuditRO				pattern	
CC_CBI				matching	
CC_CCDST				particular	
CC_CCNNC				data fields of	
CC_CIS				interest, and	
CC_ConsultsTB				then	
CC_CPACWFT					
CC_DEV				migrating	
				the	
CC_EMOProjects				identified	
CC_EPSI				fields to the	
CC_EPSI_PPRD				DMM	
CC_FMS				system. The DMM	
CC_MCCFTAS					
CC_MLDS				system uses	
CC_PABSLC				InterSystems Cache	
CC_PIE				mirrors and	
CC_PIE_Dev				multiple	
CC_PIE_PPMS				journal	
CC_PIR					
CC_PIT				readers.	
_	<u> </u>	1		larsian data. Ost	

CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
CDW14			
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CDW44			
CDW45			
CDW46			

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CDW47			
CDW48			
CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			
OIT_Lighthouse2			
OIT_RPA			
SPV			
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SPVNext			
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VHAHOC_Tier2			
VHAOCC_OCCDW			
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VHACCC_OCCDW_FFD VHIE_ISAnalytics			
VHIE_ISAnalytics_Dev			
VHIE_ISAnalytics_ETL			
XDW18_V22			
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CC DIE DDMC		14:1	
CC_PIE_PPMS		multiple	
CC_PIR		journal	
CC_PIT		readers.	
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
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CDW15			
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CDW45			
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CDW47			
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CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
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IVC_ITD			
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OIT_Lighthouse			
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SPVNext			
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SPVNext3			
VHAHOC_Tier2			
VHAOCC_OCCDW			
VHAOCC_OCCDW_PPD			
VHIE_ISAnalytics			
VHIE_ISAnalytics_Dev			
VHIE_ISAnalytics_ETL			
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XDW18_V22					
DMM SQL Server 8 BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_DATA CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FOS CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_PC3 CC_AET CC_aetpp CC_AMCMS_ETL CC_AMCMS_FMS CC_AMCMS_FMS CC_AUditRO CC_CBI CC_CCDST CC_CCNNC CC_CIS CC_CCNNC CC_CIS CC_CCACWFT CC_DEV CC_EMOProjects CC_EPSI CC_FMS CC_MCCFTAS CC_MCCFTAS CC_PABSLC	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems	Access to the system is restricted and access to specific information is limited to need to know.

00.015			
CC_PIE		Cache	
CC_PIE_Dev		mirrors and	
CC_PIE_PPMS		multiple	
CC_PIR		journal	
CC_PIT		readers.	
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
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CDW43			
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CDW46			
CDW47			
CDW48			
CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			
OIT_Lighthouse2			
OIT_RPA			
SPV			
SPV2			
SPV3			
SPVNext			
SPVNext2			
SPVNext3			
VHAHOC_Tier2			
VHAOCC_OCCDW			
VHAOCC_OCCDW_PPD			
VHIE_ISAnalytics			
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VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 9 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FW CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_OSD CBOPC_PA CBOPC_PA CBOPC_PC3 CC_AET CC_aetpp CC_AMCMS_ETL CC_AMCMS_FMS CC_AUditRO CC_CBI CC_CCDST CC_CCDST CC_CCNNC CC_CIS CC_CCPACWFT CC_DEV CC_EMOProjects CC_EPSI CC_FMS	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM	Access to the system is restricted and access to specific information is limited to need to know.

	ı	I	I	1	
CC_MCCFTAS				system uses	
CC_MLDS				InterSystems	
CC_PABSLC				Cache	
CC_PIE				mirrors and	
CC_PIE_Dev				multiple	
CC_PIE_PPMS				journal	
CC_PIR				readers.	
CC_PIT					
CC_POM					
CC_PRSNM					
CC_REFDOC					
CC_Revenue					
CC_SEMQUALITY					
CC_SEMQUALITY_CCM					
CC_VFMP					
CDW_Validation					
CDW_Validation_CCE					
CDW02					
CDW03					
CDW04					
CDW1					
CDW10					
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CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			
OIT_Lighthouse2			
OIT_RPA			
SPV			
SPV2			
SPV3			
SPVNext			
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SPVNext3			
VHAHOC_Tier2			

VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 10 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_EPRS CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FW CBOPC_OPS CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_PA CBOPC_PC3 CC_AET CC_aetpp CC_AMCMS_ETL CC_AMCMS_FMS CC_AUditRO CC_CBI CC_CCDST CC_CCNNC CC_CIS CC_CCACWFT CC_DEV CC_EMOProjects	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the	Access to the system is restricted and access to specific information is limited to need to know.

		I	
CC_EPSI		DMM	
CC_EPSI_PPRD		system. The	
CC_FMS		DMM	
CC_MCCFTAS		system uses	
CC_MLDS		InterSystems	
CC_PABSLC		Cache	
CC_PIE		mirrors and	
CC_PIE_Dev		multiple journal	
CC_PIE_PPMS			
CC_PIR		readers.	
CC_PIT			
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
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CDW45			
CDW46			
CDW47			
CDW48			
CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			
OIT_Lighthouse2			
OIT_RPA			
SPV			
SPV2			
SPV3			
SPVNext			
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SPVNext2 SPVNext3 VHAHOC_Tier2 VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 11 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_EPRS CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FW CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_PA CBOPC_PA CBOPC_PA CBOPC_PC3 CC_AET CC_aetpp CC_AMCMS_ETL CC_AMCMS_FMS CC_AUditRO CC_CBI CC_CCDST CC_CCIS CC_CONSULTSTB	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then	Access to the system is restricted and access to specific information is limited to need to know.

CC_CPACWFT		migrating	
CC_DEV		the	
CC_EMOProjects		identified	
CC_EPSI		fields to the	
CC_EPSI_PPRD		DMM	
CC_FMS		system. The	
CC_MCCFTAS		DMM	
CC_MLDS		system uses	
CC_PABSLC		InterSystems Cache	
CC_PIE		mirrors and	
CC_PIE_Dev		multiple	
CC_PIE_PPMS		journal	
CC_PIR			
CC_PIT		readers.	
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
CDW14			
CDW15			
CDW16			
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CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			
OIT_Lighthouse2			
OIT_RPA			
SPV			
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SPV2 SPV3 SPVNext SPVNext2 SPVNext3 VHAHOC_Tier2 VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 12 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_EPRS CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FW CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_PA CBOPC_PA CBOPC_PC3 CC_AET CC_aetpp CC_AMCMS CC_AMCMS_ETL CC_AMCMS_FMS CC_CCDST	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files, pattern matching	Access to the system is restricted and access to specific information is limited to need to know.

CC_CCNNC		particular	
CC_CIS		data fields of	
CC_ConsultsTB		interest, and	
CC_CPACWFT		then	
CC_DEV		migrating	
CC_EMOProjects		the	
CC_EPSI		identified	
CC_EPSI_PPRD		fields to the	
CC FMS		DMM	
CC_MCCFTAS		system. The	
CC_MLDS		DMM	
		system uses	
CC_PABSLC		InterSystems	
CC_PIE		Cache	
CC_PIE_Dev		mirrors and	
CC_PIE_PPMS		multiple	
CC_PIR		journal	
CC_PIT		readers.	
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
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CDW15			
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CDW46			
CDW47			
CDW48			
CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			
IVC_CDS			
IVC_CIPH			
IVC_landl			
IVC_IIA			
IVC_ITD			
IVC_MCA			
LSV			
LSVMembership			
OIT_Lighthouse			

OIT_Lighthouse2 OIT_RPA SPV SPV2 SPV3 SPVNext SPVNext2 SPVNext3 VHAHOC_Tier2 VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 13 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_EPRS CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FOC CBOPC_OPS CBOPC_OPS CBOPC_OPS CBOPC_OSD CBOPC_PA CBOPC_PA CBOPC_PC3 CC_AET CC_AMCMS_ETL CC_AMCMS_FMS	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method involves reading journal files,	Access to the system is restricted and access to specific information is limited to need to know.

CC_AuditRO		pattern	
CC_CBI		matching	
CC_CCDST		particular	
CC_CCNNC		data fields of	
CC_CIS		interest, and	
CC_ConsultsTB		then	
CC_CPACWFT			
CC DEV		migrating the	
CC_EMOProjects		identified	
CC_EPSI		fields to the	
CC_EPSI_PPRD		DMM	
CC_FMS		system. The	
CC_MCCFTAS		DMM	
CC_MLDS		system uses	
CC PABSLC		InterSystems	
CC_PABSEC		Cache	
CC_PIE_Dev		mirrors and	
		multiple	
CC_PIE_PPMS		journal	
CC_PIR		readers.	
CC_PIT			
CC_POM			
CC_PRSNM			
CC_REFDOC			
CC_Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
CDW1			
CDW10			
CDW12			
CDW14			
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CDW42				
CDW43				
CDW44				
CDW45				
CDW46				
CDW47				
CDW48				
CDW49				
CDWImport				
CDWLocal				
CDWPriv				
CDWPriv03				
CDWPriv04				
CDWPriv05				
CDWPriv06				
CDWPriv2				
CDWWork				
CDWWork2				
CDWWork3				
CPAC_ChoiceIV				
DBATools				
DDSClient				
ETL				
IVC_CDS				
IVC_CIPH				
IVC_landl				
IVC_IIA				
IVC_ITD				
IVC_MCA				
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LSV LSVMembership OIT_Lighthouse OIT_Lighthouse2 OIT_RPA SPV SPV2 SPV3 SPVNext SPVNext2 SPVNext3 VHAHOC_Tier2 VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM SQL Server 14 BaseCamp_Support BIO_BIS BISL_COP CBO_SHPD CBOP_Analytics CBOPC_CCODO CBOPC_COED CBOPC_DAIC CBOPC_DAIC CBOPC_EPRS CBOPC_FEE CBOPC_FEE CBOPC_FEE CBOPC_FW CBOPC_NVCC CBOPC_OPS CBOPC_OSD CBOPC_PA CBOPC_PC3 CC_AET CC_aetpp	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, medications, medical records, race/ethnicity, medical record number, sex	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels. The DMM method	Access to the system is restricted and access to specific information is limited to need to know.

CC_AMCMS		involves	
CC_AMCMS_ETL		reading	
CC_AMCMS_FMS		journal files,	
CC_AuditRO			
CC_CBI		pattern	
CC_CCDST		matching	
CC_CCNNC		particular	
CC_CIS		data fields of	
CC_ConsultsTB		interest, and	
CC_CPACWFT		then	
CC_DEV		migrating	
CC_EMOProjects		the	
CC_EPSI		identified	
CC_EPSI_PPRD		fields to the	
CC_FMS		DMM	
CC_MCCFTAS		system. The	
CC_MLDS		DMM	
CC PABSLC		system uses InterSystems	
CC_PIE		Cache	
CC_PIE_Dev		mirrors and	
CC_PIE_PPMS		multiple	
CC_PIR		journal	
CC_PIT		readers.	
CC_POM		readers.	
CC_PRSNM			
CC_REFDOC			
CC Revenue			
CC_SEMQUALITY			
CC_SEMQUALITY_CCM			
CC_VFMP			
CDW_Validation			
CDW_Validation_CCE			
CDW02			
CDW03			
CDW04			
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CDW48				
CDW49				
CDWImport				
CDWLocal				
CDWPriv				
CDWPriv03				
CDWPriv04				
CDWPriv05				
CDWPriv06				
CDWPriv2				
CDWWork				
CDWWork2				
CDWWork3				
CPAC_ChoiceIV				
DBATools				
DDSClient				
ETL				
IVC_CDS				
IVC_CIPH				
IVC_landl				
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IV/C IIA					
IVC_IIA IVC_ITD					
IVC_MCA					
LSV					
LSVMembership					
OIT_Lighthouse					
OIT_Lighthouse2					
OIT_RPA					
SPV					
SPV2					
SPV3					
SPVNext					
SPVNext2					
SPVNext3					
VHAHOC Tier2					
VHAOCC_OCCDW					
VHAOCC_OCCDW_PPD					
VHIE_ISAnalytics					
VHIE_ISAnalytics_Dev					
VHIE_ISAnalytics_ETL					
XDW18_V22					
_					
DMM SQL Server 15	Yes	Yes	Nama CCN	The DMM	Access to
BaseCamp_Support	168	168	Name, SSN, DOB, Mothers	utility is	the system
BIO_BIS			maiden name,	designed to	is restricted
BISL_COP			personal mailing	allow for	and access
CBO_SHPD			address, zip code,	full	to specific
CBOP_Analytics			personal phone	extraction of	information
CBOPC_CCODO			number, personal	VistA data	is limited to
CBOPC_COED			fax number,	from	need to
CBOPC_DAIC			personal email	specific sites	know.
CBOPC_Data			address, contact information, next	or to	
CBOPC_EPRS			of kin, emergency	aggregate data at	
CBOPC_FEE			contact	Veterans	
CBOPC_Fee_PIT			information,	Integrated	
CBOPC_FM			health insurance,	Service	
CBOPC_NVCC			certificate/License	Network	
CBOPC_OPS			numbers,	(VISN),	
CBOPC_OSD			medications,	Regional, or	
CBOPC_PA			medical records,	National	
			race/ethnicity,	levels. The	

CBOPC_PC3	medical record	DMM
CC_AET	number, sex	method
CC_aetpp		involves
CC_AMCMS		reading
CC_AMCMS_ETL		journal files,
CC_AMCMS_FMS		
CC AuditRO		pattern
CC_CBI		matching
CC_CCDST		particular
		data fields of
CC_CCNNC		interest, and
CC_CIS		then
CC_ConsultsTB		migrating
CC_CPACWFT		the
CC_DEV		identified
CC_EMOProjects		fields to the
CC_EPSI		DMM
CC_EPSI_PPRD		system. The
CC_FMS		DMM
CC_MCCFTAS		system uses
CC_MLDS		InterSystems
CC_PABSLC		Cache
CC_PIE		mirrors and
CC_PIE_Dev		multiple
CC_PIE_PPMS		journal
CC_PIR		readers.
CC_PIT		
CC_POM		
CC_PRSNM		
CC_REFDOC		
CC Revenue		
CC_SEMQUALITY		
CC_SEMQUALITY_CCM		
CC_VFMP		
CDW_Validation		
CDW_validation_CCE		
CDW02		
CDW03		
CDW04		
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CDW47			
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CDW49			
CDWImport			
CDWLocal			
CDWPriv			
CDWPriv03			
CDWPriv04			
CDWPriv05			
CDWPriv06			
CDWPriv2			
CDWWork			
CDWWork2			
CDWWork3			
CPAC_ChoiceIV			
DBATools			
DDSClient			
ETL			

IVC_CDS IVC_CIPH IVC_IandI IVC_IIA IVC_ITD IVC_MCA LSV LSVMembership OIT_Lighthouse OIT_Lighthouse2 OIT_RPA SPV SPV2 SPV3 SPVNext2 SPVNext3 VHAHOC_Tier2 VHAOCC_OCCDW VHAOCC_OCCDW_PPD VHIE_ISAnalytics VHIE_ISAnalytics_Dev VHIE_ISAnalytics_ETL XDW18_V22					
DMM Voogle Server 1 IFS IKV ikvgroup	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers,	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN),	Access to the system is restricted and access to specific information is limited to need to know.

			medications, medical records, race/ethnicity, medical record number, sex	Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	
DMM Voogle Server 2 IFS IKV ikvgroup	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers,	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN),	Access to the system is restricted and access to specific information is limited to need to know.

			medications, medical records, race/ethnicity, medical record number, sex	Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	
DMM Voogle Server 3 DMTS DCW EVT IFS IKV ikvgroup ROTH	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers,	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN),	Access to the system is restricted and access to specific information is limited to need to know.

			medications, medical records, race/ethnicity, medical record number, sex	Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	
DMM Voogle Server 4 IFS IKV ikvgroup	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers,	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN),	Access to the system is restricted and access to specific information is limited to need to know.

			medications, medical records, race/ethnicity, medical record number, sex	Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified fields to the DMM system. The DMM system uses InterSystems Cache mirrors and multiple journal readers.	
DMM Voogle Server 5 IFS IKV ikvgroup	Yes	Yes	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers,	The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN),	Access to the system is restricted and access to specific information is limited to need to know.

	medications, medical records, race/ethnicity, medical record number, sex	Regional, or National levels. The DMM method involves reading journal files, pattern matching particular data fields of interest, and then migrating the identified	
		system uses InterSystems Cache mirrors and multiple journal	
		readers.	

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

List the Program Office or IT System information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List the specific PII/PHI data elements that are processed (shared/received/transmitted) with the Program Office or IT system	Describe the method of transmittal
Corporate Data Warehouse (CDW)	The DMM (VistA eXtract of 130 VAMCs) mechanism funnels the data from all VistA nationwide systems to the Veterans Health Administration (VHA) Corporate Data Warehouse (CDW). The DMMutility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels.	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number, personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, current medications, previous medical records,race/ethnicity, medical record number, sex	SQL Database Replication from IRIS to SQL
Veteran's Health Administration (VHA)/VistA	The DMM (VistA eXtract of 130 VAMCs) mechanism funnels the data	Name, SSN, DOB, Mothers maiden name, personal mailing address, zip code, personal phone number,	IRIS ECP (Enterprise Cache Protocol)

List the Program Office or IT System information is shared/received with	List the purpose of the information being shared /received with the specified program office or IT system	List the specific PII/PHI data elements that are processed (shared/received/transmitted) with the Program Office or IT system	Describe the method of transmittal
	from all VistA nationwide systems to the Veterans Health Administration (VHA) Corporate Data Warehouse (CDW). The DMM utility is designed to allow for full extraction of VistA data from specific sites or to aggregate data at Veterans Integrated Service Network (VISN), Regional, or National levels.	personal fax number, personal email address, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, current medications, previous medical records, race/ethnicity, medical record number, sex	

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: Risk of access and misuse of information by a VA employee

<u>Mitigation:</u> All systems receiving data from DMM on VA systems are subject to VA security and privacy controls managing data. Active directory is used for access controls and resources are given access to only the systems needed to perform their duties. We also monitor system access through logs and scans

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 External	List the	List the specific PII/PHI data	List the	List the
Program Office or	purpose of	elements that are processed	legal	method of
IT System	information	(shared/received/transmitted)w	authority,	transmission
information is	being shared	ith the Program or IT system	binding	and the
shared/received	/ received /		agreemen	measures in
with	transmitted		t, SORN	place to secure
	with the		routine	data
	specified		use, etc.	
	program		that	
	office or IT		permit	
	system		external	
			sharing	

			(can be more than one)	
Oracle/Departme nt of Defense (DoD) Oracle Health Data Intelligence Platform	The DMM system houses a mirror copy of 25 million individual Veterans medical records. The system contains PII and PHI data	Name, SSN, DOB, Mothers maiden name, mailing address, zip code, phone number, contact information, next of kin, emergency contact information, health insurance, certificate/License numbers, current medications, previous medical records, race/ethnicity, medical record number, sex	National ISA/ MOU	IRIS Mirroring (Site to Site (S2S), Secure FTP. Data is encrypted at rest and in transit for all
	and is collected for the Electronic Health Records Management systems of the Veterans Administratio n and Department of Defense. The Data Migration and			interconnectio ns
	Management system sends data to Oracle Health Data Intelligence Platform for integration into the HealthIntent			

Department		
of Defense		
EHR system		
and also		
populates the		
Corporate		
Data		
Warehouse		

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: Risk of sharing more data than is appropriate.

<u>Mitigation:</u> There are contracts, business associate agreements, and MOUs that outline how VA data must be protected, used, and destroyed when the use has ended.

The risk of sharing more data than appropriate is highly unlikely, all the data we collect from VistA is transferred to CDW and Oracle Health. Connectivity to our environment requires an approved certificate and authentication.

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 system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center. All Veterans received a Notice of Privacy Practices (NOPP) every 3 years, link provided in appendix A.

6.1b If notice was not provided, explain why.

are or were employed or made contact.

Notice is not directly provided by this system, but the SORN provides notice as well as the NOPP.

79VA10, Veterans Health Information Systems and Technology Architecture (VistA) Records-VA https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28340.pdf (govinfo.gov) Per the SORN: Individuals seeking information regarding access to and contesting of records in this system may write, call or visit the VA facility location where they are or were employed or made contact.

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

This system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center. All Veterans received a Notice of Privacy Practices (NOPP) every 3 years, link provided in appendix A.

79VA10, Veterans Health Information Systems and Technology Architecture (VistA) Records-VA https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28340.pdf (govinfo.gov) Per the SORN: Individuals seeking information regarding access to and contesting of records in this system may write, call or visit the VA facility location where they

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.

This system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center. The individuals have a right to decline from the source systems as this system only serves as a transfer data.

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.

Individuals do not have the right to particular uses of the information within this system, since the system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center

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.

<u>Principle of Use Limitation:</u> 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: Individuals might not know how data in DMM may be used, collected or disclosed.

<u>Mitigation:</u> Individuals do not have the right to particular uses of the information within this system, since the system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center.

For Veterans receiving health care by VHA, each receives a Privacy Notice every 3 years. In addition, the System of Record Notice is published in the Federal Register explaining the categories of records stored in the system and routine uses of the data. Notice is provided by the public posting of this PIA and the SORN.

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.

This system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center. The VA SORN addressed records correction in VistA System.

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)?

The system is not exempt from the access provisions of 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?

DMM is a privacy act system that contains VA data including PII and PHI.

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.

This system transfers data within the VA Network. Correction of information is found in

SOR 79VA10/85 FR 84114 Veterans Health Information Systems and Technology Architecture (VistA) Records-VA states:

Individuals seeking information regarding the contesting of records in this system may write, call or visit the VA facility location where they are or were employed or made contact.

In addition, the NOPP states:

Right to Request Amendment of Health Information.

Individuals have the right to request an amendment (correction) to health information in their records if they believe it is incomplete, inaccurate, untimely, or unrelated to their care. The request must be submitted in writing, must specify the information that needs correction, and provide a reason to support the request for amendment. All amendment requests should be submitted to the facility Privacy Officer at the VHA health care facility that maintains your information or health record

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.

This system transfers data within the VA Network. Correction of information is found in

SOR 79VA10/85 FR 84114 Veterans Health Information Systems and Technology Architecture (VistA) Records-VA states. https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28340.pdf

A link to the NOPP is provided in appendix A.

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.

This system transfers data within the VA network, therefore Notices are provided at the point of collection, medical provider, VA Medical Center. The VA SORN addressed records correction in VistA System. A link to the NOPP is provided in appendix A

7.5 PRIVACY IMPACT ASSESSMENT: Access, redress, and correction

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

involved might change their behavior. (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:

<u>Privacy Risk:</u> Individuals are not aware of what is being collected in the Data and Migration Management System. Individuals might be unaware of how to correct information.

<u>Mitigation:</u> The VA SORN addressed records correction in VistA System, this PIA also serves as a notice to the public about data collection, use and disclosure.

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?

All requests for data access are managed through the ePAS system where each request and approval are recorded. For local or VISN level access, a similar process is in place for granting a user access to one or more VHA facilities data.

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?

Other agencies do not 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.

Users granted privileged level access via ePAS requests have access to the system. These users must complete the training required for their access in TMS. IT Software Developers - Information Security Role-Based Training for IT Specialist, Data Managers, Network Administrators - Information Security and Privacy Role-Based Training for Network Administrators, System Administrators - Information Security Role-Based Training for System Administrators

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?

All contractors are cleared using the VA background investigation process and must obtain the appropriate background investigation for their role. Contractors are required to take Privacy and Security training to have a PIV card and a VA network account. All contractors requiring data Access must sign the VA Non-disclosure agreement.

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

Contractors are required to apply for DMM data access through ePAS for elevated privileges with the approval of the supervisor and the Contracting Officer Representative must approve the contractor's access to DMM.

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

The contractors who provide support to the system provide maintenance to DMM according to their role. This includes setting security controls, performing monthly security scans, patching servers and crucial systems, and designing better data storage and transfer.

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.

All users with access to VA sensitive information or information system must complete VA Privacy and Security Awareness Rules of Behavior Training (TMS#10176) initially and annually thereafter. Additionally, if users will be accessing protected health information (PHI) data VA HIPAA Privacy

training (TMS#10203) is required initially and annually thereafter

IT Software Developers - Information Security Role-Based Training for IT Specialist, Network Administrators - Information Security and Privacy Role-Based Training for Network Administrators, System Administrators - Information Security Role-Based Training for System Administrators

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: 5/12/2025
- 3. The Authorization Status: Authorization to Operate (ATO)
- 4. The Authorization Date: 08/11/2023
- 5. The Authorization Termination Date: 08/10/2025
- 6. The Risk Review Completion Date: 07/25/2023
- 7. The FIPS 199 classification of the system (LOW/MODERATE/HIGH): High

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.

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)

DMM is primarily hosted on premise at the VA Austin Information Technology Center. DMM also supports a copy of its data in the VA Enterprise Cloud provided by Microsoft Azure Government (MAG). Infrastructure as a service (IaaS) and Platform as a Service (PaaS) are both currently being utilized.

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.

Yes, the contract between the VA, contractors, and Microsoft Azure Government establishes ownership rights over data, including Personally Identifiable Information (PII) and Protected Health Information (PHI). The contract number is 47QTCA22D003G.

Contractual Basis: The DMM Privacy Impact Assessment (PIA) confirms that Microsoft Azure Government is used to host applications that ingest PII/PHI. However, ownership and control of the data remain with the VA, not Microsoft.

Supporting Directive: VA Directive 6509 explicitly mandates the inclusion of privacy language in contracts to ensure that VA PII, PHI, and Sensitive Personal Information (SPI) are safeguarded in accordance with privacy laws, regulations, and VA policy

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 CSP does not collect any ancillary data

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.

Yes, the principle from NIST SP 800-144—that organizations are ultimately accountable for the security and privacy of data held by a cloud provider—is reflected in the contract. This principle is embedded in VA policy to ensure that the VA remains the data steward, even when using third-party cloud services. The VHA Directive 1080(1) and VA Directive 6509 both reinforce that responsibility for safeguarding PII/PHI lies with the VA, regardless of the hosting environment

Contractual Language: Contracts and PIAs include clauses that require cloud providers to comply with VA privacy and security standards, including adherence to Federal Acquisition Regulations (FAR) and OMB guidance.

Roles and Responsibilities for Risk Management

Under privacy control AR-3, the roles and responsibilities between the VA and Microsoft Azure Government are clearly delineated:

VA Responsibilities:

Owns and controls the data.

Ensures compliance with federal privacy laws and internal directives.

Conducts Privacy Threshold Analyses (PTAs) and PIAs for each minor application.

Manages access controls and breach response protocols.

Microsoft Azure Government Responsibilities:

Provides infrastructure and platform services.

Implements and maintains security controls as defined in the FedRAMP High baseline.

Supports the VA in meeting compliance requirements through inherited controls.

Shared Responsibilities:

Both parties collaborate on incident response, auditing, and continuous monitoring.

Microsoft provides tools and logs; the VA uses them to enforce policy and investigate issues.

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).

DMM is not using RPA

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			

ID	Privacy Controls
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, Quinn D. Martin
Information System Security Officer, Momolu Sonie
Information System Owner, Jincheng Chen "Jimmy"

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).

79VA10, Veterans Health Information Systems and Technology Architecture (VistA) Records-VA https://www.govinfo.gov/content/pkg/FR-2020-12-23/pdf/2020-28340.pdf

Veteran Health Administration Notice of Privacy Practices (September 30, 2022) You may also obtain a copy of this Notice at the following website: http://www.va.gov/vhapublications.

Under Brochures:

10-163P	<u>VA Notice of Privacy Practices</u> , 105HIG - Health Information Governance	09/30/2022	

Version date: October 1, 2024

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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)