

v. 2.00		<i>Welcome to the PIA for FY 2013!</i>
Congress passed the E-Government Act of 2002 to encourage the use of Web-based Internet applications or other information technology by Government agencies, with the intention of enhancing access to government information and services and increasing the effectiveness, efficiency, and quality of government operations.		<b>Macros Must Be Enabled To Use Full Functionality For This Form Template!</b>
To combat public concerns regarding the disclosure of private information, the E-Government Act mandated various measures, including the requirement that Federal agencies conduct a Privacy Impact Assessment (PIA) for projects with information technology systems that collect, maintain, and/or disseminate "personally identifiable information" of the public. Personally identifiable information, or "personal information," is information that may be used to identify a specific person.		<b>Microsoft Office 2003:</b> To enable macros, go to: 1) Tools > Macros > Security - Set to Medium; 2) Click OK; 3) Close the file and when reopening click on <u>Enable Macros at the prompt</u> . Or 1) When file opens click on <u>Enable Macros at the prompt</u> .
The Privacy Act and VA policy require that personally identifiable information only be used for the purpose(s) for which it was collected, unless consent (opt-in) is granted. Individuals must be provided an opportunity to provide consent for any secondary use of information, such as use of collected information for marketing.		<b>Microsoft Office 2007:</b> To enable macros, go to: 1) Office Button > Prepare > Excel Options > Trust Center > Trust Center Settings > Macro Settings > Enable All Macros; 2) Click OK
		<b>Microsoft Office 2010:</b> To enable macros, go to: 1) File Tab > Options > Trust Center > Trust Center Settings > Macro Settings > Enable All Macros; 2) Click OK
		<b>Final Signatures</b>
		Final signatures are required to be digitally signed; however wet signatures may be used on a case by case basis. All signatures should be done when all modifications have been approved by the VA Privacy Service and the reviewer has indicated that the signature is all that is necessary to obtain approval.
<b>Directions:</b>		<b>Privacy Impact Assessment Uploaded into SMART</b>
VA 6508 is the directive which outlines the PIA requirement for every System/Application/Program. If you find that you can't click on checkboxes, make sure that you are: 1) Not in "design mode" and 2) you have enabled macros.		All PIA Validation Letters should be mailed to <a href="mailto:PIAsupport@va.gov">PIAsupport@va.gov</a> to receive full credit for submission.
<b>INTERNAL WEBSITE :</b> <a href="http://www.privacy.va.gov/PIA.asp">http://www.privacy.va.gov/PIA.asp</a>		<b>Various Privacy Data Websites:</b>
<b>EXTERNAL WEBSITE :</b> <a href="http://www.privacy.va.gov/PRIVACY/Privacy_Impact_Assessment.asp">http://www.privacy.va.gov/PRIVACY/Privacy_Impact_Assessment.asp</a>		<b>SORNs :</b> <a href="http://www.rms.oit.va.gov/SOR_Records.asp">http://www.rms.oit.va.gov/SOR_Records.asp</a> <b>Directive Itself (6508):</b> <a href="http://www.va.gov/vapubs/viewPublication.asp?Pub_ID=414&amp;FType=2">http://www.va.gov/vapubs/viewPublication.asp?Pub_ID=414&amp;FType=2</a> <b>Schedule FY 2013 :</b> <a href="http://www.privacy.va.gov/PRIVACY/Privacy_Impact_Assessment.asp">http://www.privacy.va.gov/PRIVACY/Privacy_Impact_Assessment.asp</a>
<b>Roles and Responsibilities:</b>		
Roles and responsibilities for the specific process are clearly defined for all levels of staff in the VA Directive 6508 referenced in the procedure section of this document.		
a. <b>Privacy Officer</b> is responsible for the overall coordination with their local Information Security Officers and system owners to review the PIA and ensure compliance with VA Directive 6508.		Please read the following guidance on when to submit a full PIA: <a href="http://www1.va.gov/vapubs/viewPublication.asp?Pub_ID=527#page=10">http://www1.va.gov/vapubs/viewPublication.asp?Pub_ID=527#page=10</a>
b. <b>Records Officer</b> is responsible for supplying records retention and deletion schedules		
c. <b>Information Technology (IT)</b> staff responsible for the privacy of the system data will perform a PIA in accordance with VA Directive 6508 and to immediately report all anomalies to the Privacy Service and appropriate management chain.		
d. <b>Information Security Officer (ISO)</b> is responsible for assisting the Privacy Officer and providing information regarding security controls.		
e. <b>Chief Information Officer (CIO)</b> is responsible for ensuring that the systems under his or her jurisdiction undergo a PIA. This responsibility includes identifying the IT systems; coordinating with the Privacy Officer, Information Security Officer, and others who have concerns about privacy and security issues; and reviewing and approving the PIA before submission to the Privacy Service.		
<b>Definition of PII (Personally Identifiable Information)</b>		
<b>Personally Identifiable Information (PII)</b> is —any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records; and (2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.		
<b>Examples of PII include, but are not limited to:</b>		
• Personal identification number, such as social security number (SSN), passport number, driver's license number, taxpayer identification number, or financial account or credit card number		
• Address information, such as street address or email address		
• Personal characteristics, including photographic image (especially of face or other identifying characteristic), fingerprints, handwriting, or other biometric data (e.g., retina scan, voice signature, facial geometry)		
• Information about an individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information).		
Organizations should minimize the use, collection, and retention of PII to what is strictly necessary to accomplish their business purpose and mission.		
<b>A "routine use" is a Privacy Act discretionary authority published in the Federal Register that permits VA to disclose information or records from a Privacy Act-protected record without the patient's prior signed authorization. A "routine use" permits the:</b>		
(1) Release of PHI only when disclosure is also authorized by other applicable legal authorities, including 45 CFR Parts 160 and 164;		

(2) Release of drug or alcohol abuse, HIV, or sickle cell anemia medical information only when the disclosure is also authorized by 38 U.S.C. 7332.		

(FY 2013) PIA: System Information		*Green Highlight = Must Answer Question	*Yellow Highlight = Required to Sign PIA
Program or System Name (as shown in SMART):	FPO>VHA>CMOP-TUCSON>LAN		
OMB Unique System / Application / Program Identifier UPID #):	(AKA:	Exhibit 300-029-00-02-00-01-1120-00	
Description of System/ Application/ Program : "must match what is stated in System Security Plan (SSP)" ***Do not type more than allotted space!!!!*	<p>The Consolidated Mail Outpatient Pharmacy (CMOP) LAN establishes an interface for the electronic transfer of information between VHA Medical Centers (VAMCs) and the Consolidated Mail Outpatient Pharmacy host system for an integrated and highly automated outpatient prescription dispensing system. The CMOP LAN is used to transfer, process and manage the prescription data received from the medical center through the automated filling of the prescription.</p>		
Facility or Program Office Name:	Consolidated Mail Outpatient Pharmacy (CMOP)		
Title:	Name:	Phone:	Email:
Privacy Officer:	LaRue Roberts	361-356-1269	<a href="mailto:larue.morian2@va.gov">larue.morian2@va.gov</a>
Information Security Officer:	Paul Gillespie	708-786-7735	<a href="mailto:paul.gillespie@va.gov">paul.gillespie@va.gov</a>
System Owner/Delegate:	Michael Quinn	919-383-7874 x238	<a href="mailto:michael.quinn@va.gov">michael.quinn@va.gov</a>
Facility Chief Information Officer:*	Kelly Brooks	520-295-3446	<a href="mailto:kelly.brooks@va.gov">kelly.brooks@va.gov</a>
Information Owner:	Kenneth Siehr	913-758-4750	<a href="mailto:kenneth.siehr@va.gov">kenneth.siehr@va.gov</a>
Other Titles:			
Person Completing Document:	LaRue Roberts	361-356-1269	<a href="mailto:larue.morian2@va.gov">larue.morian2@va.gov</a>
Other Titles:			
Date of Last Full Approved PIA by VACO Privacy Services: (YYYY)	FY 2010		
What specific legal authorities authorize this program or system:	7301		
What is the expected number of individuals that will have their PII stored in this system:	after RX filled and data transferred back to medical		
Identify what stage the System / Application / Program is at:	Operations/Maintenance		
The approximate date (MM/YYYY) the system will be operational (if in the Design or Development stage), or the approximate number of years the system/application/program has been in operation.	1995		
Is there an authorized change control process which documents any changes to existing applications or systems?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A : First PIA		
If No, (Explain on Tab 8)			
Is there a contingency plan in place to process information when the system is down?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A : First PIA		
Has a PIA been completed within the last three years?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A : First PIA		
<b>FISMA QUESTIONS</b>			
Answers provided in this section must correspond with the FISMA information listed in SMART for this system.			
1. Is this a new system?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	
2. Does this system contain Federal information in identifiable form?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
2. System Information			

3. Does the system include information on the public?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
4. Is there a Privacy Impact Assessment (PIA) that covers this system?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> National Security System under 40 U.S.C. 11103, a PIA is not required for this system		
5. Is Federal-owned information in this system retrieved by name or unique identifier?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
6. What is the System of Records Notice (SORN) for this system?	J21VA19			
7. Has this SORN been reviewed or updated within the last three years?	Yes last year			
Date of Report (MM/YYYY):	14-Nov-12			
<b>Any check mark in the boxes below will require a full PIA. Please continue to the next TAB and complete the remaining questions.</b> <i>If there is no Personally Identifiable Information on your system, please complete TAB 2 &amp; TAB 12. (See Comment for Definition of PII)</i>				
<input type="checkbox"/> Have any changes been made to the system since the last PIA? <input type="checkbox"/> Is this a PIV system/application/program collecting PII data from Federal employees, contractors, or others performing work for the VA? <input checked="" type="checkbox"/> Will this system/application/program retrieve information on the basis of name, unique identifier, symbol or other PII data? <input checked="" type="checkbox"/> Does this system/application/program collect, store, or disseminate PII/PHI data? <input checked="" type="checkbox"/> Does this system/application/program collect, store or disseminate the SSN?				
<a href="#">Directions</a>				

## (FY 2013) PIA: System of Records

\*Green Highlight = Must Answer Question

1. Is there a SORN (System of Records Notice) already in place?

\*\*\*If Yes, select all of the appropriate SORN number(s) and continue to Tab 4:

\*\*\*If No, continue to question 2

Yes  No

\*\*\*Click to add. Delete SORN by highlighting SORN and comma if included and press the Delete key or place focus on area to delete all SORNs.

LIST OF SORN NUMBER(S) :

121VA19

For each applicable System(s) of Records, list:

2. If records are retrieved using any of the following entities, A SORN will be required

(Please check all that apply)

<input type="checkbox"/> Full Name
<input type="checkbox"/> Maiden Name
<input type="checkbox"/> Mother's Maiden Name
<input type="checkbox"/> Alias
<input type="checkbox"/> Social Security Number
<input type="checkbox"/> Passport Number
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Taxpayer Identification Number
<input type="checkbox"/> Financial Account Number
<input type="checkbox"/> Credit Card Number
<input type="checkbox"/> Street Address
<input type="checkbox"/> Email Address
<input type="checkbox"/> Photographic Image
<input type="checkbox"/> Fingerprints
<input type="checkbox"/> Handwriting
<input type="checkbox"/> Other Biometric Data
<input checked="" type="checkbox"/> Other (Explain on Tab 8)

3. Based on Question 2, is a SORN required?

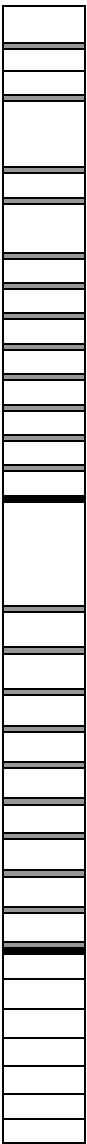
Yes  No

Yes  No

[http://www.rms.oit.va.gov/SOR\\_Records.asp](http://www.rms.oit.va.gov/SOR_Records.asp)

Location where the specific applicable System of Records Notice may be accessed:

(FY 2013) PIA: Data Collection And Storage		*Green Highlight = Must Answer Question		
The Department of Veterans Affairs is actively trying to reduce the amount of personally identifiable information (PII) stored within its systems. Please do not collect more PII than what is required.				
Please fill in each column for the data types selected.				
Data Type	Collection Method	What are the subjects told about the intended use of their information?	How is this message conveyed to them?	How is a privacy notice provided?
Veteran or Primary Subject's Personal Contact Information (name, address, telephone, etc)	VA File Database	Healthcare	All	All
Family Relation (spouse, children, parents, grandparents, etc)	N/A	N/A	N/A	N/A
Service Information	N/A	N/A	N/A	N/A
Medical Information	VA File Database	Healthcare	All	All
Criminal Record Information	N/A	N/A	N/A	N/A
Guardian Information	N/A	N/A	N/A	N/A
Education Information	N/A	N/A	N/A	N/A
Benefit Information	N/A	N/A	N/A	N/A
Other (Explain on Tab 8)				
Data Type	Storage Method	Source (If requested, identify the specific file, entity and/or name of agency)	Is data collection Mandatory or Voluntary?	
Veteran or Primary Subject's Personal Contact Information (name, address, telephone, etc)	<input checked="" type="radio"/> Yes <input type="radio"/> No	VA Files/Databases (Identify File)	<input checked="" type="radio"/> Mandatory <input type="radio"/> Voluntary	Automated
Family Relation (spouse, children, parents, grandparents, etc)	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Service Information	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Medical Information	<input checked="" type="radio"/> Yes <input type="radio"/> No	VA Files/Databases (Identify File)	<input checked="" type="radio"/> Mandatory <input type="radio"/> Voluntary	Automated
Criminal Record Information	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Guardian Information	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Education Information	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Benefit Information	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
Other (Explain on Tab 8)	<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Mandatory <input checked="" type="radio"/> Voluntary	
<i>(Please Select Yes/No)</i>				
Proximity and Timing: Is the privacy notice provided at the time of data collection?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
Purpose: Does the privacy notice describe the principal purpose(s) for which the information will be used?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
Authority: Does the privacy notice specify the effects of providing information on a voluntary basis?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
Disclosures: Does the privacy notice specify routine use(s) that may be made of the information?	<input checked="" type="radio"/> Yes <input type="radio"/> No			
<u>routine use(s)</u>				



(FY 2013) PIA: Data Sharing  *Green Highlight = Must Answer Question	** Any connection external to VA requires an ISA/MOU per VA 6500. This section below must be consistent with your System Security Plan Interconnection Security Agreement section.					
Organization	Name of Agency/Organization	Do they access this system?	Identify the type of Data Sharing	Is PII or PHI Shared?	What is the procedure you reference for the release of information?	
Internal Sharing: VA Organization	All Medical Centers	<input checked="" type="radio"/> Yes <input type="radio"/> No	Healthcare	<input checked="" type="radio"/> Yes <input type="radio"/> No	VHA Handbook 1605.2	
Other Veteran Organization		<input checked="" type="radio"/> Yes <input type="radio"/> No		<input type="radio"/> Yes <input checked="" type="radio"/> No		
Other Federal Government Agency	DOD and IHS	<input checked="" type="radio"/> Yes <input type="radio"/> No	Healthcare	<input checked="" type="radio"/> Yes <input type="radio"/> No	MOU	
State Government Agency		<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Yes <input checked="" type="radio"/> No		
Local Government Agency		<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Yes <input checked="" type="radio"/> No		
Research Entity		<input type="radio"/> Yes <input checked="" type="radio"/> No		<input type="radio"/> Yes <input checked="" type="radio"/> No		
<input type="checkbox"/> Other Project/ System (Explain on Tab 8)						
(FY 2013) PIA: Access to Records						
Does the system gather information from another system?	<input checked="" type="radio"/> Yes <input type="radio"/> No					
Please enter the name of the system:	VHA Medical Centers VISTA Systems					
(FY 2013) PIA: Secondary Use						
Will PII data be included with any secondary use request?	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="checkbox"/> Mental Health	<input type="checkbox"/> HIV	<input type="checkbox"/> Drug/Alcohol Counseling		
Check all that apply		<input type="checkbox"/> Sickle Cell	<input type="checkbox"/> Other (Explain on Tab 8)	<input type="checkbox"/> Research		

(FY 2013) PIA: Retention & Disposal	*Green Highlight = Must Answer Question		
What is the data retention period?		RCS 10-1 link for VHA: <a href="http://www.va.gov/vhapublications/rccs10/rccs10-1.pdf">www.va.gov/vhapublications/rccs10/rccs10-1.pdf</a>	
Answer: CMOP Records are purged from the LAN Production Systems every 45 days. The data is maintained in a Centralized Database where records are purged in accordance to the RCS 10-1 for pharmacy records.		RCS VB-1, Part II Revised for VBA: <a href="http://www.benefits.va.gov/WARMS/docs/admin20/rccs/part2/part2.pdf">www.benefits.va.gov/WARMS/docs/admin20/rccs/part2/part2.pdf</a>	
Explain why the information is needed for the indicated retention period?		National Archives and Records Administration: <a href="http://www.nara.gov">www.nara.gov</a>	
Answer: Pharmaceutical care			
What are the procedures for eliminating data at the end of the retention period?			
Answer: Comply with VA regulations that address sanitization and disposal of VA data.			
Where are these procedures documented?			
Answer: VA Directive and Handbook 6500, NIST guidance.			
How are data retention procedures enforced?			
Answer: Through audit and monitoring to ensure staff is complying with VA regulations.			
Has the retention schedule been approved by the National Archives and Records Administration (NARA)			
<input checked="" type="radio"/> Yes <input type="radio"/> No (Explain on Tab 8)			
(FY 2013) PIA: Children's Online Privacy Protection Act (COPPA)			
Will information be collected through the internet from children under age 13?			
<input checked="" type="radio"/> Yes (Explain on Tab 8) <input type="radio"/> No			

Answer:

Health Care Delivery			
Is the system/application/program following IT security Requirements and procedures required by federal law and policy to ensure that information is appropriately secured.	<input checked="" type="radio"/> Yes	<input type="radio"/> No (Explain on Tab 8)	
Has the system/application/program conducted a risk assessment, identified appropriate security controls to protect against that risk, and implemented those controls.	<input checked="" type="radio"/> Yes	<input type="radio"/> No (Explain on Tab 8)	
Is security monitoring conducted annually or as needed to ensure that controls continue to work properly, safeguarding the information?	<input checked="" type="radio"/> Yes	<input type="radio"/> No (Explain on Tab 8)	
Is security assessment conducted annually or as needed to ensure that controls continue to work properly, safeguarding the information?	<input checked="" type="radio"/> Yes	<input type="radio"/> No (Explain on Tab 8)	
Is adequate physical security in place to protect against unauthorized access?	<input checked="" type="radio"/> Yes	<input type="radio"/> No (Explain on Tab 8)	
<b>*Ensure PE 2, PE-3, PE-6, PE-7, PE-8 have been addressed appropriately for your categorization</b>			

Explain what security risks were identified in the security assessment? (Check all that apply)

<input checked="" type="checkbox"/> Biological Release	<input checked="" type="checkbox"/> Fire	<input checked="" type="checkbox"/> Lightning Strike	<input checked="" type="checkbox"/> Terrorist
<input checked="" type="checkbox"/> Blizzard	<input checked="" type="checkbox"/> Flood	<input checked="" type="checkbox"/> Malicious Code	<input checked="" type="checkbox"/> Thunderstorm
<input checked="" type="checkbox"/> Hurricane/Wreak Tr	<input checked="" type="checkbox"/> Harkie/Draker	<input checked="" type="checkbox"/> Password Privacy Negligence	<input checked="" type="checkbox"/> Tornado
<input checked="" type="checkbox"/> Civil Unrest	<input checked="" type="checkbox"/> Hall	<input checked="" type="checkbox"/> Personnel Unavailable	<input checked="" type="checkbox"/> Tsunami
<input checked="" type="checkbox"/> Component Failure	<input checked="" type="checkbox"/> HAZMAT Release/Spill	<input checked="" type="checkbox"/> Power Failure	<input checked="" type="checkbox"/> User Negligence
<input type="checkbox"/> Dam Failure	<input checked="" type="checkbox"/> Human Health Emergency	<input checked="" type="checkbox"/> Radiation	<input checked="" type="checkbox"/> User Sabotage
<input type="checkbox"/> Dust Debris	<input checked="" type="checkbox"/> Hurricane	<input checked="" type="checkbox"/> System Intrusion, Break-Ins	<input checked="" type="checkbox"/> Vibration
<input checked="" type="checkbox"/> Earthquake	<input checked="" type="checkbox"/> HVAC Failure	<input checked="" type="checkbox"/> System Misconfiguration	<input checked="" type="checkbox"/> Volcano
<input checked="" type="checkbox"/> Extreme Heat	<input checked="" type="checkbox"/> Indoor Humidity	<input checked="" type="checkbox"/> System Penetration	<input checked="" type="checkbox"/> Water Damage
	<input checked="" type="checkbox"/> Landslide	<input checked="" type="checkbox"/> System Tampering	<input checked="" type="checkbox"/> Winter Weather Hazards

\*If any other risks identified, explain in Tab 8

Based upon the risks identified above, Explain what security controls are being used to mitigate these risks. (Check all that apply)

<input checked="" type="checkbox"/> Access Control	<input checked="" type="checkbox"/> Configuration Management	<input checked="" type="checkbox"/> Media Protection	<input checked="" type="checkbox"/> System and Services Acquisition
<input checked="" type="checkbox"/> Audit and Accountability	<input checked="" type="checkbox"/> Contingency Planning	<input checked="" type="checkbox"/> Personnel Security	<input checked="" type="checkbox"/> System and Communication Protection
<input checked="" type="checkbox"/> Awareness and Training	<input checked="" type="checkbox"/> Identification and Authentication	<input checked="" type="checkbox"/> Physical and Environmental Protection	<input checked="" type="checkbox"/> System and Information Integrity
<input checked="" type="checkbox"/> Security Assessment and Authorization	<input checked="" type="checkbox"/> Incident Response	<input checked="" type="checkbox"/> Risk Assessment	<input checked="" type="checkbox"/> Planning <input checked="" type="checkbox"/> Maintenance

Answer: [Other Controls] Explain on Tab 8

PIA: PIA Assessment

The PIA assessment is based on FIPS 199 which can be found within your system security plan (SSP).

<b>Availability Assessment:</b> If the data being collected is not available to process for any reason what will the potential impact be upon the system or organization? (Choose One)	<input type="radio"/> The potential impact is <b>high</b> if the loss of availability could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>moderate</b> if the loss of availability could be expected to have a serious adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>low</b> if the loss of availability could be expected to have a limited adverse effect on operations, assets or individuals.
<b>Integrity Assessment:</b> If the data being collected has been corrupted for any reason what will the potential impact be upon the system or organization? (Choose One)	<input type="radio"/> The potential impact is <b>high</b> if the loss of integrity could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>moderate</b> if the loss of integrity could be expected to have a serious adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>low</b> if the loss of integrity could be expected to have a limited adverse effect on operations, assets or individuals.
<b>Confidentiality Assessment:</b> If the data being collected has been shared with unauthorized individuals what will the potential impact be upon the system or organization? (Choose One)	<input type="radio"/> The potential impact is <b>high</b> if the loss of confidentiality could be expected to have a severe or catastrophic adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>moderate</b> if the loss of confidentiality could be expected to have a serious adverse effect on operations, assets or individuals. <input type="radio"/> The potential impact is <b>low</b> if the loss of confidentiality could be expected to have a limited adverse effect on operations, assets or individuals.

The controls are being considered for the project based on the selections from the previous assessments. The minimum security requirements for our high impact system cover seventeen security-related areas with regard to protecting the confidentiality, integrity, and availability of VA information systems and the information processed, stored, and transmitted by those systems. The security-related areas include: access control; awareness and training; audit and accountability; certification, accreditation, and security assessments; configuration management; contingency planning; identification and authentication; incident response; maintenance; media protection; physical and environmental protection; planning; personnel security; risk assessment; systems and services acquisition; system and communications protection; and system and information integrity. Our facility employs all security controls in the respective high impact security control baseline unless specific exceptions have been allowed based on the tailoring guidance provided in NIST Special Publication 800-53 and specific VA directives.

## **(FY 2013) PIA: Additional Comments**

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Add any additional comments or information that may have been left out for any question. Please indicate the question you are responding to and then add your comments.

Tab 3 Row 24- At the medical center level data can be retrieved using patient name or social security number. At the CMOP level it can only be retrieved using a unique identifier assigned to the prescription when it is exported.

Tab 4 Row 30 - PSX CMOP Pharmacy Data File with patients name and address

Tab 4 Row 36 - PSX CMOP Pharmacy Data File with patients prescription data

(FY 2013) PIA: VBA Minor Applications		
Which of these are sub-components of your system?		
Access Manager	Automated Sales Reporting (ASR)	Automated Folder Processing System (AFPS)
Actuarial	BCMA Contingency Machines	Automated Medical Information Exchange II (AIME II)
Agent Orange		Automated Medical Information System (AMIS)290
Appraisal System	Centralized Property Tracking System	Automated Standardized Performance Elements Nationwide (ASPEN)
ASSISTS	Common Security User Manager (CSUM)	Broomie Closet
Awards	Compensation and Pension (C&P)	Centralized Accounts Receivable System (CARS)
Baker System	Control of Veterans Records (COVERS)	Committee on Waivers and Compromises (COWC)
	Courseware Delivery System (CDS)	Compensation and Pension (C&P) Record Interchange (CAPRI)
Bbraun (CP Memo)	Dental Records Manager	
	Education Training Website	Compensation & Pension Training Website
C&P Payment System	Electronic Appraisal System	Distribution of Operational Resources (DOOR)
C&P Training Website	Electronic Card System (ECS)	Educational Assistance for Members of the Selected Reserve Program CH 1606
	Electronic Payroll Deduction (EPD)	Electronice Performance Support System (EPSS)
CONDO PUD Builder	Eligibility Verification Report (EVR)	Enterprise Wireless Messaging System (Blackberry)
	Fiduciary Beneficiary System (FBS)	Financial Management Information System (FMII)
EndoSoft	Fiduciary STAR Case Review	Hearing Officer Letters and Reports System (HOLAR)
FOCAS	Financial and Accounting System (FAS)	Inquiry Routing Information System (IRIS)
Inforce	Insurance Undclaimed Liabilities	
INS - BIRLS	Inventory Management System (IMS)	Modern Awards Process Development (MAP-D)
Insurance Online	Interactive Voce Response (IVR)	Personal Computer Generated Letters (PCGL)
Insurance Self Service	LGY Centralized Fax System	Personnel Information Exchange System (PIES)
LGY Home Loans	Loan Service and Claims	Post Vietnam Era educational Program (VEAP) CH 32
LGY Processing		Purchase Order Management System (POMS)
MES	Loan Guaranty Training Website	Reinstatement Entitlement Program for Survivors (REAPS)
Mobilization	Mental Health Assistant	Reserve Educational Assistance Program CH 1607
Montgomery GI Bill	National Silent Monitoring (NSM)	RightFax
MUSE	Powerscribe Dictation System	Service Member Records Tracking System
Omnicell	Rating Board Automation 2000 (RBA2000)	Survivors and Dependents Education Assistance CH 35
Priv Plus	Records Locator System	Systematic Technical Accuracy Review (STAR)
RAI/MDS	Remittance Processing System	Training and Performance Support System (TPSS)
Right Now Web	Review of Quality (ROQ)	VA Online Certification of Enrollment (VA-ONCE)
SAHSHA	Search Participant Profile (SPP)	VA Reserve Educational Assistance Program
Script Pro	Spinal Biifida Program Ch 18	
SHARE	State Benefits Reference System	Veterans Assistance Discharge System (VADS)
Sidexis	State of Case/Supplemental (SOC/SSOC)	Veterans Exam Request Info System (VERIS)
Synquest	Telecare Record Manager	Veterans Insurance Claims Tracking and Response System (VICTARS)
VBA Training Academy		Veterans Service Representative (VSR) Advisor
Veterans Canteen Web	VBA Enterprise Messaging System	Vocational Rehabilitation & Employment (VR&E) CH 31
VETSNET Housekeeping	Web Electronic Lender Identification	Web Automated Folder Processing System (WAFPS)
VR&E Training Website		Web Automated Reference Material System (WARMS)
Web LGY		Web Automated Verification of Enrollment
		Web-Enabled Approval Management System (WEAMS)
		Web Service Medical Records (WebsMR)
		Work Study Management System (WSMS)
Explain any minor application that are associated with your installation that does not appear in the list above. Please provide name, brief description, and any comments you may wish to include.		
Name		
Description		
Comments		
Is PII collected by this min or application?		
Does this minor application store PII?		
If yes, where?		
Who has access to this data?		
Name		
Description		
Comments		
Is PII collected by this min or application?		
Does this minor application store PII?		
If yes, where?		
Who has access to this data?		
Name		
Description		
Comments		
Is PII collected by this min or application?		
Does this minor application store PII?		
If yes, where?		
Who has access to this data?		

(FY 2013) PIA: VHA/NCA Minor Applications A-M			
Which of these are sub-components of your system?			
1184 Web A4P	Citrix Clinical Case Registries	Embedded Fragment Registry ENCORE 2	Incentive Awards Incident Reporting
ACCU Care	Clinical Data Repository/Health Data Repository	ENDSOFT	Income Verification Match
ACCU Check	Clinical Info Resource Network	Engineering	Incomplete Records Tracking
ACCU Med	Clinical Monitoring System	Enrollment Application System	Inpatient Medications
Adobe Acrobat	Clinical Notes Templates	Enterprise Terminology Server & VHA Enterprise Terminology Services	Intake/ Output
ADP Planning (PlanMan)	Clinical Procedures	ePROMISE	Integrated Billing
ADT	Clinical Reminders	Equipment/ Turn-in Request	Integrated Patient Funds
Adverse Reaction Tracking	Clippership	Event Capture	Interim Management Support
Agent Cashier	Combat Veteran Outreach	Event Driven Reporting	Inventory Management System
Air Fortress	Committee on Waiver and Compromises	Extensible Editor	Kernal
ASISTS	Consult/ Request Tracking	External Peer Review	Kids
Authorization/ Subscription	Controlled Correspondence	EYECAR	KOWA
Auto Instrument	Controlled Substances	Fee Based Claims System	Lab Service
Auto Replenishment/ Ward Stock	CP&E	Fee Basis	Laboratory Electronic Data Interchange
AUTOCAD	CPRS	Financial and Accounting System (FAS)	Letterman
Automated Access Request	CPT/ HCPCS Codes	Financial Management System (FMS)	Lexicon Utility
Automated Info Collection Sys	Credentials Tracking	Functional Independence	Library
Automated Lab Instruments	Credit Card Authentication	Gen. Med. Rec. - I/O	List Manager
Automated Med Info Exchange	Data Innovations	Gen. Med. Rec. - Vitals	Lynx Duress Alarm
Automated Sales Reporting	DELIVEREX	Gen. Med.Rec. - Generator	Mailman
AutoMed	Dental	GENDEX	MCCR National Database
Bad Code Med Admin	DICTATION-Power Scribe	Generic Code Sheet	Meadows (MDWS)
Barcode Medication Administration Contingency Plan (BCU)	Dietetics	Genesys	Medicine
BCMA Contingency Workstations	Discharge Summary	Get Well Networks	Mental Health
BDN 301	DRG Grouper		
Beneficiary Travel	DRIM Plus	GMED	MHTP
BH	Drug Accountability	GRECC	MICOM
Big Fix	DSIT	Health Data and Informatics	Microsoft Exchange E-mail System
CA Verified Components - DSSI	DSS Extracts	Health Level Seven	Military/Vet Eye Injury Registry
Capacity Management - RUM	DSS Quadramed	Health Summary	Minimal Patient Dataset
Capacity Management Tools	EDS Whiteboard (AVJED)	Health Summary Contingency	Missing Patient Reg (Original) A4EL
CAPRI	Education Tracking	HINQ	Mumps AudioFAX
Cardiff Teleform	EEO Complaint Tracking	Hospital Based Home Care	MyHealthEVet
Cardiology Systems (stand alone servers from the network)	EKG System	ICB	
Care Management	Electronic Card System (ECD)	ICR - Immunology Case Registry	
CareTracker	Electronic Payroll Deduction (EPD)	IFCAP	
CHECKPOINT	Electronic Signature	Imaging	
Explain any minor application that are associated with your installation that does not appear in the list above. Please provide name, brief description, and any comments you may wish to include.			
Name	CMOP PSX V2.0		
Description	Prescription Software		
Comments			
Is PII collected by this minor application?	YES		
Does this minor application store PII?	YES		
If yes, where?		PSX	
Who has access to this data?	Administrative Privileges needed		
Name			
Description			
Comments			
Is PII collected by this minor application?			
Does this minor application store PII?			
If yes, where?			
Who has access to this data?			
Name			
Description			
Comments			
Is PII collected by this minor application?			
Does this minor application store PII?			
If yes, where?			
Who has access to this data?			

(FY 2013) PIA: VHA/NCA Minor Applications N-Z			
Which of these are sub-components of your system?			
National Cemetery Association	Pharmacy Data Management	Scanning Exam and Evaluation System	VBECs
National Drug File	Pharmacy National Database	Scheduling	VDEF
National Laboratory Test	Pharmacy Prescription Practice	Security Suite Utility Pack	Vendor - Document Storage Sys
NDBI	PICIS OR	Sentillion	Veterans Canteen Web
Network Health Exchange	Police & Security	Shift Change Handoff Tool	Veterans Information Solution
NOAHLINK	Problem List	ShoreTel	VHAHUNAPP1
NOIS	Progress Notes	Social Work	VHAHUNPC1
Nursing Service	Prosthetics	Stellant	VHS & RA Tracking System
Occurrence Screen	Purchase Order Management System	Stentor	Visit Tracking
Omnicell	Pyxis	Surgery	VISTA RAD
Oncology	Q-Matic	Survey Generator	VISTA RO
Onvicord (VLOG)	QMSI Prescription Processing	Telecare Record Manager	VistaLink
Optifill	Quality Assurance Integration	Temp Trak	VistaLink Security
Order Entry/ Results Reporting	Quality Improvement Checklist	Text Integration Utilities	Visual Impairment Service Team ANRV
Outpatient Pharmacy	QUASER	Tickler Database	Vitria BusinessWare
P2000 ROBOT	Radiology/ Nuclear Medicine	Toolkit	VIXS
PACS database	RAFT	TopCon	Voluntary Timekeeping
Patch Module	RAIS	TraceMaster	Voluntary Timekeeping National
Patient Data Exchange	Record Tracking	Tracking Continuing Education	WEB HINQ
Patient Feedback	Registration	Traumatic Brain Injury	Whiteboard
Patient Representative	Release of Information - DSSI	Unwinder	Women's Health
PCE Patient Care Encounter	Remote Order/ Entry System	Utility Management Rollup	Workload and Overtime
Personal Computer Generated Letters	RPC Broker	Utilization Review	
Pharmacy Benefits Management	Run Time Library	VA Conference Room Registration	
	SAGG	VA Fileman	
	SAN	VAMedSafe	
Explain any minor application that are associated with your installation that does not appear in the list above. Please provide name, brief description, and any comments you may wish to include.			
Name			
Description			
Comments			
Is PII collected by this minor application?			
Does this minor application store PII?			
If yes, where?			
Who has access to this data?			
Name			
Description			
Comments			
Is PII collected by this minor application?			
Does this minor application store PII?			
If yes, where?			
Who has access to this data?			
Name			
Description			
Comments			
Is PII collected by this minor application?			
Does this minor application store PII?			
If yes, where?			
Who has access to this data?			

(FY 2013) PIA: Final Signatures		*Green Highlight = Must Answer Question				
Facility Name:	Consolidated Mail Outpatient Pharmacy (CMOP)					
Title:	Name:	Phone:	Email:			
Privacy Officer:	LaRue Roberts	361-356-1269	larue.morian2@va.gov			
Digital Signature Block						
Information Security Officer:	John McKinley	913-758-4741	<a href="mailto:john_mckinley@va.gov">john_mckinley@va.gov</a>			
Digital Signature Block						
System Owner/Delegate:	Michael Quinn	919-383-7874 x238	michael.quinn@va.gov			
Digital Signature Block						
Facility Chief Information Officer	Kelly Brooks	520-295-3446	<a href="mailto:kelly.brooks@va.gov">kelly.brooks@va.gov</a>			
Digital Signature Block						
Information Owner:	Kenneth Siehr	913-758-4750	<a href="mailto:kenneth.siehr@va.gov">kenneth.siehr@va.gov</a>			
Digital Signature Block						
Other Titles:						
Digital Signature Block						
Date of Report:	14-Nov-12					
OMB Unique Project Identifier	Exhibit 300-029-00-02-00-01-1120-00					
Project Name	FPO>VHA>CMOP-TUCSON>LAN					
The Signature Process:						
<ul style="list-style-type: none"> <li>• Complete the PIA form.</li> <li>• Name the PIA Excel FORM ["FY13-Region # - Facility Name - Facility # -Date(mmddyyyy).xls"] <ul style="list-style-type: none"> <li>• Example: "FY13-Region3-Lexington VAMC-596-10302008.xls"</li> <li>• Submit the completed PIA Excel form to SMART Database.</li> </ul> </li> <li>• Fix errors the reviewers sent back, rename the file and submit to SMART Database <ul style="list-style-type: none"> <li>• If no errors, convert form into PDF with Nuance PDF Professional.</li> </ul> </li> <li>• Name the PIA PDF form ["FY13-Region # - Facility Name - Facility # - Date(mmddyyyy).xls"] <ul style="list-style-type: none"> <li>• Obtain digital signatures on the "Final Signatures tab"</li> <li>• Submit signed PIA PDF form to the SMART Database.</li> </ul> </li> </ul>						

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