

Purpose and Scope

The Privacy Threshold Analysis (PTA) is a tool created by the VA Privacy Service and used by Privacy Officers, Information System Owners, Information System Security Officers (ISSOs), and other stakeholders. Based on the information in the PTA, PIA Support determines the following:

- 1) Whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002.

With the assistance of the ISSO, Information System Owners will complete the PTA annually (or earlier if there is a major system change), and forward to the assigned Privacy Officer for review. Upon completion of an initial review, the Privacy Officer will forward a copy to the VA PIA Support Mail Group for final review.

- 1) A PIA is required to be done triennially, or when PIA Support indicates on the annual PTA that an updated PIA is required. **Note:** An updated PIA will be required earlier if there are major updates or changes to the system. The current PIA template can be downloaded here: <http://vaww.oprm.va.gov/privacy/pia.aspx>

Date submitted for review: 4/23/2019

Name of the IT System: Airborne Hazards and Open Burn Pit Registry (AHOBPR)

Name of the Program Office: Health Registries (HREG) Program

	Name	E-mail	Phone Number
Privacy Officer	Andrea Wilson	Andrea.wilson3@va.gov	321-405-4305
Information Systems Security Officer	Pedro Epting	Pedro.epting@va.gov	708-483-5096
Information System Owner	Chris Brown	Christopher.brown1@va.gov	202-270-1432

SPECIFIC QUESTIONS

1. Status of project (there can be more than one box checked)

- ☐ This is a new IT system
- ☒ This IT system or project has an existing approved PIA
- 12/21/2017
- Veterans Integrated Registries Platform (VIRP)

☐ As part of the annual PTA validation process, there ARE major changes¹.

Enter major system changes here.

☒ As part of the annual PTA validation process there are no major changes.

☐ This project is a Patch to an IT system titled: [Click here to enter text.](#)

☐ This IT system or project is decommissioned as of: [Click here to enter a date.](#)

☐ This IT system or project is no longer operational (but has not been decommissioned)

☒ This IT System is categorized as minor and augments a Major Application²
Veterans Integrated Registries Platform (VIRP)

☐ This IT System is categorized as a Major Application

2. Please describe the purpose of the IT system, project or program in layman's terms so that a non-technical person can understand.

This project is part of the Veterans Integrated Registries Platform (VIRP). The Airborne Hazards and Open Burn Pit Registry will allow VHA to track and study potential effects of airborne particulate and open burn pit exposure. It provides: a) a reach out capability with known findings, b) health intervention and follow-up treatment in the VA, and c) reporting capabilities on this specific Veteran and Service Member population to VA Management, Department of Defense (DoD) Management, and Congress. AHOBPR is a registry of Service Members and Veterans who were potentially exposed to airborne toxic chemicals and fumes from open-air burn pits and other sources in Iraq and Afghanistan. The registry consists of a database of registrants, their exposures and their health conditions that may be clinically relevant to the diagnosis or treatment of the individuals or the monitoring of the target population. The registry is accessible from two web portals (a public portal and a VA staff portal) and include a reporting, analysis and data cube capability.

3. Do you collect, process, or retain PII on: (Check all that apply)

☒ Veterans or dependants

☒ VA Employees

☒ VA Contractors

☐ Members of the public

¹ VA DIRECTIVE 6508 - 5. DEFINITIONS d. Major Change. A change to the information collected or maintained that could result in greater disclosure of information or a change in the way personal data is used.

² OMB Circular A-130, Appendix III, defines major application as an application that requires special attention to security due to the risk and magnitude of harm resulting from the loss, misuse, or unauthorized access to or modification of the information in the application.

☐ Volunteers

☐ Clinical Trainees

PII/PHI and electronic health record data will be collected, stored or retained for Veterans and/or dependents. The only information the system collects about VA Employees and Contractors are User IDs and their assigned user roles and permissions.

4. Do you use or collect Social Security Numbers (SSNs)?

☐ No

☒ Yes (Please provide the function of the SSN within the project and the legal authority to use or collect it.)

The Airborne Hazards and Open Burn Pit Registry (AHOBPR) is part of the Veterans Integrated Registries Platform (VIRP) which falls under the National Patient Databases – VA. Legal authority to collect SSN for VA patients was given to that system and pertains to the AHOBPR. Executive Order 9397. The last four digits of the SSN are displayed with the intent to assist the user in identifying and selecting a specific patient, along with other patient details such as last name, first name, Date of Birth (DOB), etc. It is part of the patient identifier.

5. Does the IT system or project connect, receive, or share Personally Identifiable Information (PII)³ with another **internal** organization, IT system, website or application?

☐ No

☒ Yes

Database Table:

Server Name	Database Name that contains PII/PHI	Data Elements Sharing (Internally)
Vaauscresqc20a.aac.dva.va.gov Vaauscresqc20b.aac.dva.va.gov Vaauscresqc40a.aac.dva.va.gov Vaauscresqc40b.aac.dva.va.gov Vaauscresqc50a.aac.dva.va.gov Vaauscresqc50b.aac.dva.va.gov	CRS, STG, DataMart_Registries	<ul style="list-style-type: none"> • Full Name • Home Address • Email • SSN • Date of Birth • Telephone • Admission/Discharge Dates • Medical Record Numbers • Past/Present/Future physical, mental health or condition

Internal Organization, IT system, Data Elements and Method of Transmission

³ VA Directive 6508. Personally-Identifiable Information (PII). A subcategory of VA Sensitive Data, PII means any information about the individual maintained by an agency, including but not limited to the following: (i) education, financial transactions, medical history, and criminal or employment history; (ii) Information that can be used to distinguish or trace the individual's identity, including name, social security number, date and place of birth, mother's maiden name, biometric records or any other personal information which is linked or linkable to an individual. This term can be interchanged with Sensitive Personal Information (SPI).

Internal Organization Name	IT System Name	Data Elements	Method of Transmission
Veterans Health Administration	Corporate Data Warehouse	<ul style="list-style-type: none"> • Name • SSN • DOB • Mailing Address • Zip Code • Phone Number • Email Address • Current Medications • Previous Medical Records • Race/Ethnicity • Theatre of War • Date of Death • Last Service Separation Date • Patient EDIPI • Laboratory Results • Marital Status • Gender • Branch of Service • Unit Component • Loss/Separation Date • Eligible Deployment Segments • Start Date Eligible Deployment Segments • End Date Eligible Deployment • Segments • Location Eligible Deployment Segments • Occupation Type During Eligible Deployment Segment 	Electronically pulled from Vista thru Computerized Patient Record System (CPRS)
Veteran's Health Administration	Master Veteran Index (MVI)	Patient identifying data and mappings between data identifiers, such as electronic data interchange personal identifier (EDIPI) and Integration Control Number (ICN)	Web Service Simple Object Access Protocol (SOAP) XML
Veteran's Health Administration	Veteran Identity/Eligibility Reporting System (VIERS)/ VA/DoD Identity	<ul style="list-style-type: none"> • Name • SSN • DOB • Mailing Address • Zip Code 	Structured Query Language (SQL) Server Integration Services (SSIS)

	Repository (VADIR)	<ul style="list-style-type: none"> • Phone Number • Email Address • Current Medications • Previous Medical Records • Race/Ethnicity • Theatre of War • Date of Death • Last Service Separation Date • Patient EDIPI • Laboratory Results • Marital Status • Gender • Branch of Service • Unit Component • Loss/Separation Date • Eligible Deployment Segments • Start Date Eligible Deployment Segments • End Date Eligible Deployment Segments • Location Eligible Deployment Segments • Occupation Type During Eligible Deployment Segment 	
Veteran's Health Administration	VA Enterprise Messaging Infrastructure (eMI)	<ul style="list-style-type: none"> • Name • SSN • DOB • Mailing Address • Zip Code • Phone Number • Email Address • Current Medications • Previous Medical Records • Race/Ethnicity • Theatre of War • Date of Death • Last Service Separation Date • Patient EDIPI • Laboratory Results • Marital Status • Gender • Branch of Service 	Structured Query Language (SQL) Server Integration Services (SSIS). Web services to manage and execute the Extract, Transform, and Load (ETL) packages.

		<ul style="list-style-type: none"> • Unit Component • Loss/Separation Date Eligible Deployment Segments • Start Date Eligible Deployment Segments • End Date Eligible Deployment Segments • Location Eligible Deployment Segments • Occupation Type During Eligible Deployment Segment 	
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6. Does the IT system or project connect, receive, or share Personally Identifiable Information (PII)⁴ with any other **external (Outside of VA)** organization, IT system, third-party website or application?
- ☒ No
☐ Yes

Table

External System Name	Data Elements
N/A	

7. If information is shared with external (outside of VA) systems, is this sharing covered by an existing information sharing agreement? *This could be a Memorandum of Understanding (MOU), Memorandum of Agreement (MOA), Business Associate Agreement (BAA) Letter of Intent (LOI), Information Exchange Agreement (IEA), etc.*
- ☒ Not Applicable
☐ Yes

Please describe applicable information sharing agreement, type of connection, and organization/Agency and system name in a table below.

⁴ VA Directive 6508. Personally-Identifiable Information (PII). A subcategory of VA Sensitive Data, PII means any information about the individual maintained by an agency, including but not limited to the following: (i) education, financial transactions, medical history, and criminal or employment history; (ii) Information that can be used to distinguish or trace the individual's identity, including name, social security number, date and place of birth, mother's maiden name, biometric records or any other personal information which is linked or linkable to an individual. This term can be interchanged with Sensitive Personal Information (SPI).

Table

System Name	External Organization or Agency Name	Type of Connection	Agreement Type (Can be more than one)
N/A			

8. Does the IT system or project employ any of the following technologies? (Check all that apply).

☐ Closed Circuit TV

☐ Sharepoint

☐ Social Media

☐ Mobile Applications

☐ Web Portal

☐ Cloud Computing

☒ None of the above

**Privacy Threshold Analysis Review
(To be completed by the VA Privacy Service)**

Date reviewed by VA Privacy Service Office: 5/24/2019

Name of Privacy Analyst:

Albert Belzer

DETERMINATION

- ☐ This is NOT a privacy sensitive IT system or project – The IT system/project contains no PII and does not require a Privacy Impact Assessment (PIA).
☐ PTA sufficient at this time
- ☒ This IS a privacy sensitive IT system or project
☐ A PIA is required

PRIVACY SERVICE COMMENTS

The Airborne Hazards and Open Burn Pit Registry (AHOBPR) is a privacy sensitive system that collects, maintains, and/or processes Personally Identifiable Information on Veterans and/or dependents, VA employees and contractors. A PIA was completed on 12/21/2017. As such, a PIA will not be required until 12/21/2020, unless this system undergoes a major change. This Privacy Threshold Analysis is approved upon arrival of the signed document.

Privacy Officer Signature and date:

Information System Owner Signature and date:

Information System Security Officer (ISSO) Signature and date:
