

**Area Boundaries and the Privacy Threshold Analysis (PTA) and
Privacy Impact Assessment (PIA) Process**

1. **PURPOSE:** This Notice is related to VA Directive 6508, Implementation of Privacy Threshold Analysis and Privacy Impact Assessment, and VA Handbook 6508.1, Procedures for Privacy Threshold Analysis and Privacy Impact Assessment. This Notice only applies to the Veterans Health Administration (VHA), Veterans Benefits Administration (VBA) and the National Cemetery Administration (NCA). Veteran privacy is a key priority for the Department of Veterans Affairs (VA), and VA goes to great lengths to ensure that Personally Identifiable Information (PII) / Protected Health Information (PHI) is protected. Compliance with the Privacy Act, including completing Privacy Threshold Analyses (PTAs) and Privacy Impact Assessments (PIAs), documents how VA protects Veterans' PII/PHI.
2. **POLICY:** As of January 1, 2020, the Office of Information Technology (OIT) End User Operations merged the General Services System boundaries of the VHA, VBA, and NCA systems within a given geographic region into a single new boundary known as a "VA Area." In order to comply with the new VA Area boundaries, PTAs and PIAs will be drafted and submitted at the VA Area level, rather than at the individual facility and administration level.
 - a. The Information System Owners for the VA Areas will be the OIT Area Managers (AMs), responsible for the cyber-accreditation boundaries within the area campus.
 - b. By default, the designated Area Privacy Officer will be the VHA PO in the Area. If there is more than one VHA PO in the Area, the Designated Area Privacy Officer will be the PO of the VHA facility where the AM is affiliated.
 - c. VHA, VBA and NCA Privacy Officers shall coordinate with the AMs in their area, as well as their local data owners to complete the PTA/PIA.
 - d. The designated Area Privacy Officer will be responsible for initiating the PTA annually (PIA triennially) or when notified by the AM that there is a modification to the boundary in their areas and coordinating its completion with the respective facility and administration Privacy Officers and Information System Security Officers in their VA Area. Upon completion the designated Area Privacy Officer will submit the completed PTA/PIA for review, approval and publishing to the PIA Support Team (piasupport@va.gov).
 - e. If any party is unresponsive and/or fails to provide necessary input on the PIA within thirty (30) calendar days of receiving a request for information, the PIA Support Team (piasupport@va.gov) should be contacted for resolution.
3. **RESCISSION:** This notice rescinds VA Notice 19-01 and expires four months after the date of publication.

4. **RESPONSIBLE OFFICE:** VA Privacy Service (within OIT) is responsible for notifying field Privacy Officers of systems requiring annual PTA completion and review, as well as providing notification of PIA expirations. For questions or additional information, please contact the VA Privacy Service at privacyservice@va.gov or 202-273-5070.

CERTIFIED BY:

**BY THE DIRECTION OF THE
SECRETARY OF VETERANS AFFAIRS:**

/s/

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