DEPARTMENT OF VETERANS AFFAIRS

Summary

The VA Project Management Accountability System (PMAS) is a disciplined approach to information technology (IT) project development and delivery within which IT project managers are held accountable for meeting cost, schedule, and scope. PMAS is designed to reduce project implementation risks, institute monitoring and controls, establish accountability, and create a reporting discipline. At all times, VA officials will develop, follow, and enforce policies which support the PMAS methodology. In addition, Federal Agencies are required to identify all Personally Identifiable Information (PII) residing within their organization or under the control of their organization through a third party (e.g., a system being developed and tested by a contractor). Agencies should use a variety of methods to identify PII. A PMAS Privacy Threshold Analysis (PTA) is often used to identify PII.[1]

Purpose and Scope

The PMAS Privacy Threshold Analysis (PTA) is a tool created by the VA Privacy Service and used by Privacy Officers, IT system owners, PMAS project managers and Integrated Project Teams (IPTs) at every stage within the PMAS process to identify PII and determine the following:

1) Whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002.
2) Whether a Privacy Officer is needed to attend an IPT meeting regularly.

Please complete the PTA and send to your assigned Privacy Officer for review and determination. Once initial determination is made, the Privacy Officer will send a copy to the VA Privacy Service for documentation purposes.

1) If a PIA is necessary you will be added to the Fiscal Year PIA schedule and will be required to complete a PIA every 3 years until the IT system or project is decommissioned.

2) If your IPT project requires a Privacy Officer you will be assigned one by the Business Sponsor (Customer/End User).[2]

Date submitted for review:

Name of the PMAS project:

Name of the program office:

Name of the PMAS project manager:

Email for the PMAS project manager:

Has an Information Security Officer (ISO) been assigned? If so please enter the name and email below.
Name of ISO:

Email for ISO:

Has an Privacy Officer (PO) been assigned? If so please enter the name and email below.
Name of PO:

Email for PO:

[1] National Institute of Standards and Technology, 800-122 GUIDE TO PROTECTING THE CONFIDENTIALITY OF PERSONALLY IDENTIFIABLE INFORMATION (PII).

[2] VA DIRECTIVE 6071 PROJECT MANAGEMENT ACCOUNTABILITY SYSTEM (PMAS).

SPECIFIC QUESTIONS

1. Please describe the purpose of the IT system, project or program in a way so a non-technical person could understand.

2. Do you collect, process, or retain information on: (Please check all that apply)

   ☐ Veterans or dependants ☐ Members of the public

   ☐ VA Employees ☐ Volunteers

   ☐ VA Contractors ☐ Clinical Trainees

3. Do you use or collect Social Security Numbers (SSNs)? If yes, please provide the function of the SSN within the project and the legal authority to use or collect it.

   ☐ No

   ☐ Yes *(Enter function of SSN and legal authority below)*

4. What information about individuals is collected, processed, or retained? *(Please provide a specific description of information that might be collected, processed, or retained such as names, addresses, emails, health information, financial information, biometrics, etc.)*

[3] 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.

5. Does the IT system or project connect, receive, or share information in identifiable form[4] or Personally Identifiable Information (PII)[5] with any other IT systems, third-party websites or applications?
   - ☐ No
   - ☐ Yes *(If yes, please list below)*

6. If information is shared with external (outside of VA) systems, is this sharing covered by an existing information sharing access agreement? *This could be a Memorandum of Understanding (MOU), Memorandum of Agreement (MOA), Letter of Intent (LOI), Information Exchange Agreement (IEA), etc.*
   - ☐ Not Applicable
   - ☐ Yes *(Please describe applicable information sharing access agreement in place)*

7. 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

[4] OMB Memorandum M-03-22 a. *Information in identifiable form*- is information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

[5] 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).

Privacy Threshold Analysis Review
(To be completed by the Privacy Officer)

Date reviewed by Privacy Officer:

Name of Privacy Officer:

DETERMINATION

☐ This is NOT a privacy sensitive IT system or project - The IT system/project contains no information in identifiable form or PII and does not require a PIA to be conducted.

☐ PTA sufficient at this time

☐ This IS a privacy sensitive IT system or project.

☐ A PIA is required

PRIVACY OFFICER COMMENTS

Privacy Officer Signature

Project Manager/
System Owner Signature