# Do not alter the Template. Provide responses where indicated only.

# Purpose and Scope

The Privacy Threshold Analysis (PTA) is privacy compliance and risk management assessment tool designed to document the collection, creation, maintenance, use and disclosure of personally identifiable information (PII) and personal health information (PHI) within an information technology (IT) system, program, rulemaking, or project.

A PTA is used to determine if an IT system or project contains PII/PHI, whether a Privacy Impact Assessment (PIA) is required, whether a System of Records Notice (SORN) is required or needs to be updated, and if any other privacy requirements apply. Additionally, a PTA must be completed for an IT system or project to receive an ATO.

A PTA is reviewed and approved by VA Privacy Service before the development or acquisition of a new IT system and annually, thereafter, unless there is a major change to an existing IT system or project. When a major change [[1]](#footnote-1)occurs to an existing IT system or project, the PTA must be updated and approved *prior* to the implementation of the change.

**Note:** Major changes to information system may require updates to other privacy compliance documentation such as the PIA and SORN *prior* to the implementation of the change. VA Privacy Service will inform the system contacts of any additional privacy requirements.

The completion of the PTA is a collaborative effort between the VA Privacy Service, Information System Owner (ISO) or Program Manager (PM), Information System Security Officer (ISSO), System Privacy Officer (PO), and other stakeholders. ISO or PM will initiate and coordinate the PTA with the assistance of the ISSO and PO. The assigned PO will review the PTA to ensure quality and complete responses. Upon completion of an initial review, the PO (System Steward at Enterprise level) will forward a copy to the VA Privacy Service’s [PIA Support Mail Group](mailto:piasupport@va.gov) for final review and approval.

**Note:** PTAs must receive the approval from VA Privacy Service prior to uploading the document into the Enterprise Mission Assurance Support Service (eMASS). PTAs without VA Privacy Service approval are invalid.

**Throughout the document spell out all acronyms first time used**

# 1 - Information System and Project Information

1.1 Date PTA submitted to PIA Support for review: *Click here to enter a date.*

1.2 Name of the IT System or Project (Add system name as it appears in eMASS):

*Click or tap here to enter text.*

1.3: eMASS ID #

1.4 Name of VA Administration:

VHA

VBA

NCA

VACO (Includes Enterprise, OI&T)

1.5 Name of the Program Office: *Click or tap here to enter text.*

1.5.1 Indicate system ownership/control for the IT system or project. If the system has an [eMASS](https://vaww.vashare.oit.va.gov/sites/ois/KnowledgeService/Pages/eMASS.aspx) entry, ensure this information matches with the eMASS entry:

VA Partnership

VA Owned and VA Operated

VA Owned and non-VA Operated

VA Controlled / non-VA Owned and Operated

## IT SYSTEM AND PROJECT CONTACTS

| **Title** | **Name** | **E-mail** | **Phone Number** | **Signature Required** |
| --- | --- | --- | --- | --- |
| Privacy Officer | *Click here to enter text.* | *Click here to enter text.* | *Click here to enter text.* | *Yes* |
| Information System Security Officer | *Click here to enter text.* | *Click here to enter text.* | *Click here to enter text.* | *Yes* |
| Information System Owner | *Click here to enter text.* | *Click here to enter text.* | *Click here to enter text.* | *Yes* |
| Data/Business/Information Owner[[2]](#footnote-2) | *Click here to enter text.* | *Click here to enter text.* | *Click here to enter text.* | *No* |

## STATUS OF IT SYSTEM AND PROJECT

* 1. Select the box which reflects the status of IT system or project

This is a new IT system or project

This is an existing IT system or project that has never had a PIA

This is an existing IT system or project that has an approved PIA. Provide the approval date for the PIA. **Approval date will be the date of the last signature**.

*Click here to enter date approved.*

This IT system or project is being decommissioned

1. Indicate date of decommission: *Click here to enter a date.*
2. Describe what will happen to the system data upon decommission, if data is being migrated, indicate where:

*Click here to enter information.*

This IT system or project is no longer operational but not decommissioned.

*Click here to enter the planned/expected decommission date*

* 1. Select the box that applies to the IT system or project

(Select one of the below checkboxes, if applicable):

This IT System or project is categorized as minor system and augments a major system[[3]](#footnote-3)

*Click here to enter the major system’s name*

This IT System or project is categorized as a major system.

1.8 Select the box that reflects the type of model used by the IT system or project:

Software as a Service (SaaS)

Platform as a Service (PaaS)

Infrastructure as a Service (IaaS)

Desktop as a Service (DaaS)

Mobile Backend as a Service (MBaaS)

Information Technology Management as a Service (ITMaaS)

Not Applicable

1.9 Check the box below that reflects the type of information contained in the IT system or project:

The product/Service **WILL** contain VA data.

The product **WILL NOT** contain VA data. If selected, please use the below checkboxes to indicate the applicable criteria:

User owns a device (even if VA paid for the purchase of the device).

product/Service has no direct connections or interfaces to VA systems or network.

Users consent to share their data (which may include PII and PHI) directly with the provider.

Provider must have published terms and conditions for user consent.

VA providers access data in a view-only mode, or with limited functionality per the user’s consent.

1.10 What is the PII confidentiality impact level? Information regarding PII confidentiality can be found in [NIST SP 800-122](https://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-122.pdf). (**This decision must be made by the Privacy Officer.**) Please select one:

Low

Moderate

High

# 2 - Annual PTA Validation Process

**[Skip this section if this is a new PTA submission or if system is being decommissioned]**

The IT System and Project contacts must resubmit the PTA annually to attest or indicate if any major changes have occurred to the IT system or project which creates new privacy risks.

* 1. Select the appropriate box(es) below.

As part of the annual PTA validation process, there **ARE** major changes. If there are major changes, provide a description of the changes.

*Click here to enter major change.*

The major change involves a Patch to an IT system titled: *Click here to enter text.*

As part of the annual PTA validation process there are **NO** major changes.

# 3 - Privacy Threshold Analysis Questions

* 1. Please describe the purpose of the IT system or project in layman’s terms so that a non-technical person can understand. The description should be at least a paragraph, at minimum **and start with system name**. **(Spell out all acronyms first time use.)**

*Click here to enter the description.*

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

Cloud Computing[[4]](#footnote-4)

SharePoint

Closed Circuit TV

Social Media

Mobile Devices/Applications

Applications

Web Portal  
  Internal  
  External

Robotic Process Automation (RPA)[[5]](#footnote-5)

Other: *Click here to enter information.*

Not Applicable

* 1. Is data stored in the cloud? If yes, please answer the following questions:

**NOTE: Systems using the VA Enterprise Cloud only need to respond to 3.3.1.**

3.3.1 Please select the checkbox that identifies the type of cloud being used:

Government Cloud

VA Enterprise Cloud (VAEC)

Commercial Cloud (Private or Hybrid)

**Name of Cloud Service Provider***: Enter name here.*

3.3.2 Is there an agreement in place between the VA and the Cloud Service Provider (CSP)?

Yes. If yes, please identify the agreement in place (For major CSPs (ex. Azure, AWS), please provide the contract #. For all other CSPs, provide the ISA/MOU, SLA, etc.)

*Click here to enter the description.*

No.

3.3.3 Is the cloud service FedRAMP approved?

Yes.

No.

* 1. Does the IT system or project collect, process, retain or share any information about individuals?

No. If no, briefly describe the type of information collected, processed, retained, or shared by the IT system or project.

*Click here to enter the types of information*

**NOTE:** If you checked “No”, STOP hereafter entering the types of information. Please do not make any checkbox selections after 3.4 as no further responses are required. Remove all blue prefilled texts inside the tables and denote “N/A”. Proceed with submitting the PTA to VA Privacy Service’s PIA Support team ([piasupport@va.gov](mailto:piasupport@va.gov)) for review and determination.

Yes. Please complete the table below.

*PII / PHI Data Collected*

| **Check if Applicable** | **Title** | **List data elements** |
| --- | --- | --- |
|  | Veterans or Dependents |  |
|  | VA Employees |  |
|  | VA Contractors |  |
|  | Members of the Public/Individuals |  |
|  | Volunteers |  |
|  | Clinical Trainees |  |

## PRIVACY ACT SYSTEM OF RECORDS

* 1. Is information about individuals **retrieved** from the IT system or project by a unique identifier such as Name, Social Security Number, or other number (ex. Internal/Integrated Control Number)?

No.

Yes.

3.5.1 If yes, is there an existing Privacy Act system of records notice (SORN) that has been published in the Federal Register to cover this IT system or project and the information within it?

No. If no, please consult with your administration Privacy Officer or VA Privacy Service.

Yes. If yes, provide the SORN number, SORN Title and a link to the SORN from the OPRM site. (<https://www.oprm.va.gov/privacy/systems_of_records.aspx>).

*Click here to enter the description.*

3.5.2 If yes, does the SORN need to be updated? (SORNs need to be updated if older than 6 years from date of publication in the Federal Register)

No

Yes, if yes, please contact SORN Point of Contact and select applicable checkbox below. (The SORN POC can be located on the SORN spreadsheet as listed on the [SORN website](https://www.oprm.va.gov/privacy/systems_of_records.aspx).)

SORN is over 6 years old and out of date, SORN POC is aware and working the update.

SORN requires changes, SORN POC is aware and working the update.

* 1. Does the system involve information collected directly from individuals who are the subject of the information?

No

Yes

## SOCIAL SECURITY NUMBER REDUCTION

* 1. Are Social Security Numbers (SSNs) collected, processed, retained, or shared by the IT system or project?

No

Yes

* 1. Does the IT system provide any special protection to SSNs (e.g., SSNs are encrypted, only available to certain users, hidden from all users via a look-up table, only in partial form)?

No

Yes. If yes, describe any special protection provided.

*Click here to enter the description.*

## INTERNAL AND EXTERNAL INFORMATION SHARING

* 1. Does the IT system or project connect, receive, or share PII[[6]](#footnote-6) with another **internal** VA organization, IT system, website or application?

No *[If “No,” place “N/A” in the Table below]*

Yes *[If “Yes,” please explain in Table below]*

**PII Mapping of Components (*Please update accordingly and remove blue instruction text prior to submission)*** [*If PIA is required, this information in this table should match the information in the Components table of question 1.1 in the PIA.]***:**

*Please list all privacy sensitive internal database connections. This information is pulled from the Map Scan spreadsheet. Please list Server Names once and provide the corresponding databases in the next column. Multiple listings of the same server name are not required.*

PII Mapped to Components

| **Database Name that contains PII/PHI** | **Specifically list the PII/PHI Data Elements Sharing (Internally)** |
| --- | --- |
| * candidate\_mailing\_output * genisis\_utility\_db * recruitment\_enrollment\_app\_db | Social Security Number, EKG reading, Blood Pressure |
| * UPS WorldShip | Name, Address |

**Internal Organization, IT system, Data Elements and Method of Transmission *(Please update accordingly and remove blue instruction text prior to submission)*** *[If PIA is required, the information in this table should match the information in question 4.1 of PIA]:*

Data Shared with Internal Organizations

| **Identify and list the names of any VA program offices, other VA organizations or IT systems within VA with which information is shared** | **Specifically list the Data Elements** | **Method of Transmission** |
| --- | --- | --- |
| Veterans Benefits Administration  VBMS  (SAMPLE) | Social Security Number, Benefits Information, Claims Decision, DD-214 | Compensation and Pension Record Interchange (CAPRI) electronic software package |
| Veterans Health Administration  VistA  (SAMPLE) | System Log files, sample clinical data that may contain Protected Health Information (PHI) | Electronically pulled from VistA thru Computerized Patient Record System (CPRS) |

* 1. Does the IT system or project connect, receive, or share PII/PHI with any other **external (outside of VA)** organization, IT system, third-party website, or application?

No *[If “No,” place “N/A” in the Table below]*

Yes *[If yes, please explain in Table below]*

Yes, If yes, 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.*

**Table *(Please update accordingly and remove blue instruction text prior to submission)*** *If PIA is required, the information in this table should match the information in question 5.1 of PIA]:*

Data Shared with External Organizations

| **Identify and list the names of any program offices, contractor-supported IT systems, and any other organization or IT system outside the VA with which information is shared** | **Specifically list the Data Elements Shared/Received** | **Type of Connection** | **Agreement Type (Can be more than one)** |
| --- | --- | --- | --- |
| Social Security Administration | SSN, Name, Address | Site to Site (S2S), IPSEC Tunnel, Secure FTP | National ISA/ MOU |
| Internal Revenue Services | Name, Financial Information | Secure Web-Portal, Secure Socket Layer | ISA/ MOU, Computer Matching Agreement |
| Department of Defense | SSN, Name, Address | Bi-directional Health Information Exchange | MOU |

# Privacy Threshold Analysis Review

**(To be completed by VA PIA Support Analyst)**

**Date reviewed by VA PIA Support Analyst:** *Click here to enter a date.*

**Reviewed for accuracy by PIA Support Analyst:**

## DETERMINATION

**Privacy Sensitive IT System or Project**

The IT system or project does not collect, process, retain or share PII/PHI information and is NOT privacy sensitive.

The IT system or project IS privacy sensitive based on the responses provided above. Please see the comments below for additional privacy requirements for your IT system or project.

## VA PIA SUPPORT ANALYST COMMENTS FOR PRIVACY SENSITIVE IT SYSTEMS/PROJECTS

Privacy Impact Assessment:

a. This is a new IT system or project which collects, processes, retains or shares PII/PHI information and requires a new PIA within 60 days from last dated signature.

b. Major changes have been made to an existing IT system or project and an updated PIA is required within 60 days of last dated signature.

c. No major changes have been made to the existing IT system or project, and an updated PIA is required within 3 years of last dated signature on approved PIA: Click here to enter a date.

d. Other: *Click or tap here to enter text.*

Privacy Act System of Records Notice:

a. A SORN is required for this IT system or project

b. A SORN needs to be created for this IT system or project

d. A SORN update is required for this IT system or project

c. A SORN is not required for this IT system or project

Privacy Act (e)(3) statement:

a. Is required for this IT system or project

b. Is not required for this IT system or project

**VA PIA SUPPORT ANALYST COMMENTS (continued)**

Additional Analyst Comments:

*Click here to enter comments.*

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

7 Information collected directly from individuals requires a Privacy Act (e)(3) statement. Agencies must provide a Privacy Act Statement to all persons asked to provide personal information about themselves, which will go into a system of records (i.e., the information will be stored and retrieved using the individual’s name or other personal identifier such as a Social Security Number). Consult VA Handbook 6300.5 for guidance.

# Privacy Threshold Analysis Approval Signatures

**Privacy Officer Signature**

**Information System Security Officer Signature**

**Information System Owner Signature**

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. [↑](#footnote-ref-1)
2. VA DIRECTIVE 6508: Data Owner - Work with the POs, Program Managers, Project Managers, ISOs, System Managers, and System Developers to ensure that appropriate privacy protections related to data sensitivity are in place and indicated in their PIA submissions; Serve as point of contact for questions related to system data; Respond to questions from POs, Program Managers, Project Managers, ISOs, System Managers, and System Developers that are related to the PA submission. [↑](#footnote-ref-2)
3. OMB Circular A-130, Major information system means a system that is part of an investment that requires special management attention as defined in OMB guidance and agency policies, a “major automated information system” as defined in 10 U.S.C. § 2445, or a system that is part of a major acquisition as defined in the OMB Circular A-11, Capital Programming Guide, consisting of information resources. [↑](#footnote-ref-3)
4. Cloud Computing includes the following products/services: Software as a Service (SaaS), Managed Software as a Service (MSaaS), Infrastructure as a Service (IaaS), Platform as a Service (PaaS), Desktop as a Service (DaaS), Mobile Backend as a Service (MBaaS), and Information Technology Management as a Service (ITMaaS). [↑](#footnote-ref-4)
5. Robotic Process Automation (RPA): 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). [↑](#footnote-ref-5)
6. 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). [↑](#footnote-ref-6)