

Changes to the Privacy Threshold Analysis (PTA) and Privacy Impact Assessment (PIA) Process

1. 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) is protected. Compliance with the Privacy Act, including completing Privacy Threshold Analyses (PTAs) and Privacy Impact Assessments (PIAs), documents how VA protects Veterans' PII.
2. A working group on the PTA and PIA process has been revising 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, to better clarify processes, roles, and responsibilities. Publication of the revised Directive is anticipated in nine months.
3. While the current directive and handbook are being reviewed and finalized, the following new interim policy guidance *is effective immediately*:
 - a. Information System Owners (ISOs) are responsible for initiating the PTA process in the event of a major system change. Privacy Officers (POs) are responsible for initiating the annual PTA review process upon notification of PIA expiration.
 - b. POs are responsible for initiating and coordinating the PIA process whenever there is a major system change as defined in the PTA, as well as initiating the standard three-year PIA renewal process. While this is still a collaborative process between the PO, ISO, Information System Security Officer (ISSO), and several other stakeholders, the PO is responsible for coordinating input from all parties and ensuring that the PIA is completed in a timely manner.
 - c. This escalation procedure should be followed to address timely contribution to the PIA process: If the Information System Owner is unresponsive to the PO and/or fails to provide necessary input on the PIA within thirty (30) calendar days, the PO should contact the PIA Support Team (piasupport@va.gov) for resolution.
 - d. VA Privacy Service is responsible for notifying field Privacy Officers of systems requiring annual PTA completion and review, as well as providing notification of PIA expirations.
4. During Fiscal Year 2020, the VA Privacy Service will conduct several training sessions on the PTA and PIA process, including new aspects of VA Directive 6508 and VA Handbook 6508.1.

5. This Notice expires one year after the date of publication.
6. Please contact the VA Privacy Service at privacyservice@va.gov or 202-273-5070 for additional information.

CERTIFIED BY:

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