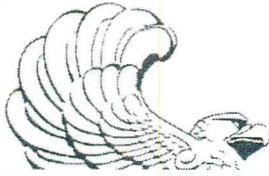


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Date: April 14, 2017
Appraiser: David Weber
Agency: Department of Veterans Affairs
Subject: DAA-0015-2017-0002

INTRODUCTION

Schedule Overview

Veterans Health Administration (VHA) manages records related to health and well-being of veterans. VHA established the Privacy Compliance Assurance office in 2007 to comply with the Health Insurance Portability and Accountability Act (HIPPA) regulations requiring compliance audits of its facilities' privacy, FOIA, and records management programs.

Additional Background Information This schedule covers audits, self-assessments, monitoring data and training material necessary to ensure compliance with HIPPA and other requirements to manage health information appropriately. Dispositions in this schedule are consistent with HIPPA requirements and retention periods approved for other agencies such as the Department of Defense (DAA-0330-2012-0005).

Overall Recommendation

I recommend approval of this schedule.

APPRAISAL

Item 1: Performance Audit Case Files documenting the lifecycle a facility audit. Included are pre-audit information, records of the compliance status and remediation efforts of the facility, and any post-audit consultations to correct deficiencies.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

*Has little or no research value.

*Does not document the significant actions of Federal Officials

*Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

*Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 2: Facility Self-Assessment Case Files documenting self-reported findings of facilities related to privacy compliance.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

*Has little or no research value.

*Does not document the significant actions of Federal Officials

*Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

*Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 3: PCA Annual Reports informing VHA leadership of the compliance monitoring status of VHA facilities.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

*Has little or no research value.

*Does not document the significant actions of Federal Officials

*Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

*Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 4: Reports Submitted to Congress documenting the state of privacy compliance at VHA facilities.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- *Has little or no research value.
- *Does not document the significant actions of Federal Officials
- *Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

- *Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 5: VHA Health Care Facility Privacy, Freedom of Information Act (FOIA) and Records Management Monitoring Data used to monitor and report on program performance.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- *Has little or no research value.
- *Does not document the significant actions of Federal Official
- *Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

- *Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 6: VHA Privacy Compliance Assurance education, training and guidance material providing background to the program, describing tools and SOPs for privacy and FOIA officers and publicizing the program to VHA staff.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- *Has little or no research value.
- *Does not document the significant actions of Federal Officials
- *Electronic format does not enhance the value of the records

Adequacy of Proposed Retention Period(s)

- *Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved

Item 7: Guidance Material that provides instructions, fact sheets, frequently asked questions, and other general information about the compliance program.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- *Has little or no research value.
- *Does not document the significant actions of Federal Officials
- *Electronic format of the records does not enhance their value

Adequacy of Proposed Retention Period(s)

- *Adequate from standpoint of legal rights and accountability

Media Neutrality: Approved



DAVID WEBER

Appraiser

Federal Register Notice

DAA-0015-2017-0002

Department of Veterans Affairs, Veterans Health Administration (VHA), (DAA-0015-2017-0002, 7 items, 7 temporary items). Records related to compliance audits, self-assessments, and training for privacy and freedom of information act programs at VHA facilities.

David S. Weber, ACRA

Records Appraisal and Agency Services

June 20, 2017