

Request for Records Disposition Authority

Records Schedule Number DAA-0015-2017-0002

Schedule Status Approved

Agency or Establishment Department of Veterans Affairs

Record Group / Scheduling Group Records of the Department of Veterans Affairs

Records Schedule applies to Major Subdivision

Major Subdivision Veteran Health Administration

Schedule Subject VHA Privacy Compliance Assurance (PCA)

Internal agency concurrences will be provided No

Background Information 1008 VHA Privacy Compliance Assurance (PCA)

In 2007 the Privacy Compliance Assurance office (PCA) was established to comply with federal regulations to conduct compliance audits of Veterans Health Administration (VHA) facilities' Privacy, Freedom of Information Act (FOIA) and Records Management programs. The requirements to monitor are defined in the Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule, FOIA Improvement Act and the National Archives and Records Administration (NARA) guidelines for Federal Records. Monitoring requirements for Privacy, FOIA and Records Management for VHA has been promulgated into policy in VHA Handbook 1605.03, Privacy Compliance Assurance Program and Privacy Compliance Monitoring and DRAFT VHA Handbook 6300.01, Records Management Compliance Monitoring.

Item Count

Number of Total Disposition Items	Number of Permanent Disposition Items	Number of Temporary Disposition Items	Number of Withdrawn Disposition Items
7	0	7	0

GAO Approval

Outline of Records Schedule Items for DAA-0015-2017-0002

Sequence Number	
1	Performance Audit Case Files Disposition Authority Number: DAA-0015-2017-0002-0001
2	Facility Self-Assessment (FSA) Case File Disposition Authority Number: DAA-0015-2017-0002-0002
3	Performance Audit and Facility Self-Assessment Reports to Stakeholders
3.1	PCA Annual Reports Disposition Authority Number: DAA-0015-2017-0002-0003
3.2	Reports Submitted to Congress Disposition Authority Number: DAA-0015-2017-0002-0004
4	VHA Health Care Facility Privacy, Freedom of Information Act (FOIA) and Records Management Monitoring Data Disposition Authority Number: DAA-0015-2017-0002-0005
5	VHA Privacy Compliance Assurance (PCA) education, training, and guidance material
5.1	Training Material Disposition Authority Number: DAA-0015-2017-0002-0006
5.2	Guidance Material Disposition Authority Number: DAA-0015-2017-0002-0007

Records Schedule Items

Sequence Number						
1	Performance Audit Case Files Disposition Authority Number DAA-0015-2017-0002-0001 <p>The records within the PCA Performance Audit Case File contain information on the entire lifecycle of each Individual PCA Performance Audit of VHA healthcare facilities. The PCA Performance Audit Case File consists of electronic records that prepare PCA and the audited facility for a Performance Audit by PCA. It includes electronic data entered into an electronic Compliance Monitoring Tool (eCMT) used to document the findings of the PCA Audit Team and the compliance status of the audited facility. The case file includes all documents that inform the facility of the audit; prepare the facility and PCA for the audit; document the compliance status of the audited facility; document remediation actions taken by the facility and consultation services provided by PCA during the Post Audit Review period. All documents generated for these purposes will be uploaded into the eCMT for the audit and housed in an electronic Compliance Monitoring Database (eCMD) by eCMT, which will constitute the Performance Audit Case File for the audit (case). All PCA Performance Audit Case Files will be maintained in accordance with the requirements of the Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule, which mandates that these audit records be available to present to the Secretary of Health and Human Services upon request for a period of 6 years. (45 C.F.R. §§160.310 and 164.5300). Electronic Files. Electronic records that make up the Performance Audit Case File.</p> <p>Final Disposition Temporary</p> <p>Item Status Active</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Manual Citation</td> <td style="width: 50%;">Manual Title</td> </tr> <tr> <td>New</td> <td>Records Control Schedule (RCS 10-1)</td> </tr> </table> <p>Disposition Instruction</p> <p>Cutoff Instruction Cutoff at the end of FY after official closure of Performance Audit</p> <p>Retention Period Destroy 6 year(s) after cutoff</p>		Manual Citation	Manual Title	New	Records Control Schedule (RCS 10-1)
Manual Citation	Manual Title					
New	Records Control Schedule (RCS 10-1)					

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Additional Information

GAO Approval Not Required

Facility Self-Assessment (FSA) Case File

Disposition Authority Number DAA-0015-2017-0002-0002

The records within the Facility Self-Assessment Case File contain information on the entire lifecycle of each individual Facility Self-Assessment administered by PCA and completed by healthcare facilities. The FSA case file consists of electronic records that are developed by PCA in order to administer the FSA and all electronic documents and responses uploaded by the facility to substantiate its responses to the FSA. It includes electronic data entered into the electronic Facility Self-Assessment tool (eFSA) used to document the self-reported findings of the assessed facility, all documents that inform the facility of the self-assessment; prepare the facility and PCA for the self-assessment; document the compliance status of the self-assessed facility; document remediation actions taken by the facility and consultation services provided by PCA during the Post-Validation Consultation. All documents generated for these purposes will be uploaded into the eFSA for the particular FSA and housed in the electronic Compliance Monitoring Database (eCMD) by eFSA, which will constitute the Facility Self-Assessment Case File for the self-assessment (case). All PCA Facility Self-Assessment Case Files will be maintained in accordance with the requirements of the Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule, which mandates that these audit records be available to present to the Secretary of Health and Human Services upon request for a period of 6 years (45 C.F.R. §§160.310 and 164.530 (j)).

Final Disposition Temporary

Item Status Active

Is this item media neutral? Yes

Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No

Manual Citation	Manual Title
New	Records Control Schedule (RCS 10-1)

Disposition Instruction

Cutoff Instruction Cutoff at the end of FY

Retention Period Destroy 6 year(s) after cutoff

Additional Information

<p>3</p>	<p>GAO Approval Not Required</p> <p>Performance Audit and Facility Self-Assessment Reports to Stakeholders The reports generated in the process of Informing VHA Leadership and other outside agencies of the compliance monitoring status of VHA Healthcare facilities for Privacy, FOIA and Records Management Programs.</p>				
<p>3.1</p>	<p>PCA Annual Reports</p> <p>Disposition Authority Number DAA-0015-2017-0002-0003</p> <p>PCA Annual Reports, VHA Leadership Reports, VISN and Program Office Quarterly Reports, and other reports as requested</p> <p>Final Disposition Temporary</p> <p>Item Status Active</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p>				
	<table border="1"> <tr> <td data-bbox="358 968 932 1010">Manual Citation</td> <td data-bbox="932 968 1484 1010">Manual Title</td> </tr> <tr> <td data-bbox="358 1010 932 1074">New</td> <td data-bbox="932 1010 1484 1074">Records Control Schedule (RCS 10-1)</td> </tr> </table>	Manual Citation	Manual Title	New	Records Control Schedule (RCS 10-1)
Manual Citation	Manual Title				
New	Records Control Schedule (RCS 10-1)				
<p>3.2</p>	<p>Disposition Instruction</p> <p>Cutoff Instruction Cutoff at end of FY after the date of the report.</p> <p>Retention Period Destroy 6 year(s) after cutoff</p> <p>Additional Information</p> <p>GAO Approval Not Required</p> <p>Reports Submitted to Congress</p> <p>Disposition Authority Number DAA-0015-2017-0002-0004</p> <p>Secretary of VA, Secretary of HHS and/or other oversight bodies.</p> <p>Final Disposition Temporary</p> <p>Item Status Active</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p>				
	<table border="1"> <tr> <td data-bbox="358 1910 932 1921">Manual Citation</td> <td data-bbox="932 1910 1484 1921">Manual Title</td> </tr> </table>	Manual Citation	Manual Title		
Manual Citation	Manual Title				

4	<p>New</p> <p>Disposition Instruction</p> <p>Cutoff Instruction Cutoff at end of FY after the date of the report.</p> <p>Retention Period Destroy 6 year(s) after cutoff</p> <p>Additional Information</p> <p>GAO Approval Not Required</p> <p>VHA Health Care Facility Privacy, Freedom of Information Act (FOIA) and Records Management Monitoring Data</p> <p>Disposition Authority Number DAA-0015-2017-0002-0005</p> <p>The records generated in the process of monitoring and documenting the compliance status and program performance of the Privacy, FOIA and Records Management Programs in VHA health care facilities. These records support and are critical to VHA's compliance with HIPAA, the Federal Records Act and the FOIA Improvement Act of 2016 as they show evidence of required monitoring activities All VHA Health Care Facility Privacy, FOIA and Records Management monitoring data will be maintained in accordance with the requirements of the Health Insurance Portability and Accountability Act, Privacy Rule, which mandates that these audit records be available to present to the Secretary of Health and Human Services upon request for a period of 6 years (45 C.F.R. §§160.310 and 164.5300)). a. Electronic Files. Electronic records used to document compliance monitoring</p> <p>Final Disposition Temporary</p> <p>Item Status Active</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p>	<p>Records Control Schedule (RCS 10-1)</p>				
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New	Records Control Schedule (RCS 10-1)					
	<p>Disposition Instruction</p> <p>Cutoff Instruction Cutoff at end of FY that record was created.</p> <p>Retention Period Destroy 6 year(s) after cutoff.</p> <p>Additional Information</p>					

5	<p>GAO Approval Not Required</p> <p>VHA Privacy Compliance Assurance (PCA) education, training, and guidance material</p> <p>The records generated in the process of providing education, training, and guidance to Privacy and FOIA Officers and Records Managers on compliance monitoring and preparation for PCA Performance Audits. Educational topics include the importance of a compliant monitoring program, how to set up a compliant monitoring program and providing sample tools and SOPs to use. Some training may be in direct response to issues found either by the White House Office of Special Council, VA Office of Inspector General (OIG), HHS or other Agencies tasked with compliance monitoring or investigating complaints.</p>				
5.1	<p>Training Material</p> <p>Disposition Authority Number DAA-0015-2017-0002-0006</p> <p>Training material including but not limited to PowerPoint presentations, scripts for the presentations, sample compliance monitoring tools, sample SOPs, etc.</p> <p>Final Disposition Temporary</p> <p>Item Status Active</p> <p>Is this item media neutral? Yes</p> <p>Do any of the records covered by this item currently exist in electronic format(s) other than e-mail and word processing? No</p>				
	<table border="1"> <tr> <th data-bbox="367 1187 932 1229">Manual Citation</th> <th data-bbox="932 1187 1492 1229">Manual Title</th> </tr> <tr> <td data-bbox="367 1229 932 1289">New</td> <td data-bbox="932 1229 1492 1289">Records Control Schedule (RCS 10-1)</td> </tr> </table>	Manual Citation	Manual Title	New	Records Control Schedule (RCS 10-1)
Manual Citation	Manual Title				
New	Records Control Schedule (RCS 10-1)				
	<p>Disposition Instruction</p> <p>Cutoff Instruction Cutoff at the end of FY when training was created.</p> <p>Retention Period Destroy 6 year(s) after cutoff or when training is obsolete, updated or superseded whichever comes first.</p>				
5.2	<p>Additional Information</p> <p>GAO Approval Not Required</p> <p>Guidance Material</p> <p>Disposition Authority Number DAA-0015-2017-0002-0007</p> <p>Guidance material including but not limited to, documents that provide instruction, such as how to prepare for a PCA Audit, factsheets, Question and Answer database, etc.</p>				

Final Disposition Temporary

Item Status Active

Is this item media neutral? Yes

Do any of the records covered
by this item currently exist in
electronic format(s) other than e-
mail and word processing? No

Manual Citation	Manual Title
New	Records Control Schedule (RCS 10-1)

Disposition Instruction

Cutoff Instruction Cutoff at the end of FY when guidance material was created.

Retention Period Destroy 6 year(s) after cutoff or when guidance material is obsolete, updated or superseded whichever comes first.

Additional Information

GAO Approval Not Required

Agency Certification

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal in this schedule are not now needed for the business of the agency or will not be needed after the retention periods specified.

Signatory Information

Date	Action	By	Title	Organization
03/01/2017	Certify	Matthew Staden	Records Officer	Veterans Health Administration - Records Management
11/06/2017	Submit for Concurrence	David Weber	Senior Appraisal Archivist	National Archives and Records Administration - Records Management Services
11/15/2017	Concur	Margaret Hawkins	Director of Records Management Services	National Records Management Program - ACNR Records Management Services
11/15/2017	Concur	Margaret Hawkins	Director of Records Management Services	National Records Management Program - ACNR Records Management Services
11/16/2017	Approve	David Ferriero	Archivist of the United States	Office of the Archivist - Office of the Archivist