


Date: **MAR 25 2010**

From: Assistant Deputy Under Secretary for Health for Policy and Planning

Subj: Security for Contract for the Survey of Veteran Enrollees' Health and Reliance Upon VA, Contractor ICF Macro

To: Acting Deputy Assistant Secretary for Information Protection and Risk Management

Thru: James Graham Jr., Information Security Officer 

1. Since 1999, the Veterans Health Administration (VHA) has conducted comprehensive nationwide surveys designed to provide critical and essential information on veteran utilization of health services, projecting the resources and services needed in VHA, and in developing the budget. The survey collects information on a random sample of 42,000 veterans enrolled in the VA system, who participate in an approximately 15-30 minute telephone survey.

2. VHA's Office of the Assistant Deputy Under Secretary for Health for Policy and Planning was prepared to launch the update the National VHA Survey of Enrollees in January 2010, but because of a modification to the original contract to incorporate VA Memorandum dated August 27, 2008, VA Contract Security/Privacy Requirements, could not proceed without a waiver to VA Directive/Handbook 6500 Certification and Accreditation requirement (C&A).

3. ICF Macro International, the contractor who has conducted the survey since 2005 and is now in the final option year of the contract has not been subject to the C&A process as required to host/process VA sensitive information. Currently VHA provides names, age, addresses, and telephone numbers to the contractor to conduct the survey. The contractor collects and provides VHA with information relating to the type of service received.

4. Initiating the C&A process in the final year of this contract would mean not obtaining valuable information needed to project upcoming resources, services, and budget requirements and would in all likelihood negate the final year of this contract.

5. Recommend the requirement for C&A process be waived based on the following:

- a. While the information VHA provides to the contractor is considered PII by VA Directive, it is readily available in other public records (i.e., name, age, address, and telephone number).

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- b. Contract personnel conducting the survey will not have access to the VA network and there is no physical or virtual connection between VA and contractor systems. The data is provided to ICF Macro on a CD encrypted with a VA approved encryption software.
- c. The Contractor Security Control Assessment (CSCA) (Self-Assessment Questionnaire for Contract Service Providers) submitted for review revealed no obvious weaknesses and there have been no security violations since the 2005 start date.
- d. Contractor personnel have completed background investigations and the VA Information Security – Rules of Behavior and Privacy Training courses.
- e. VHA has obtained permission from Office of Management and Budget to run this recurring survey concurrent with this 2010 Census.

6. Questions concerning this request can be directed to Marybeth Matthews at 414-384-2000 extension 42359 or Karen Lentz at 414-384-2000 extension 42365.

Patricia Vandenberg
Patricia Vandenberg, MHA

APPROVE/DISAPPROVE

Karen Doherty

Karen Doherty

4/14/10

Date