

January 16, 2007

**APPLICATION OF VETERANS HEALTH INFORMATION SYSTEMS AND  
TECHNOLOGY ARCHITECTURE (VISTA) MAILMAN**

**1. PURPOSE:** This Veterans Health Administration (VHA) Directive defines policy for using electronic communications, including e-mail, within the Veterans Health Information Systems and Technology Architecture (Vista) Legacy Systems.

**2. BACKGROUND**

a. Department of Veterans Affairs (VA) and Veterans Health Administration (VHA) policies, including VHA Handbook 1907.01, Health Information Management and Health Records, require the encryption of sensitive information transported over VA's wide area network, including through e-mail in the Vista Legacy Systems. Due to the limitations within Vista Legacy Systems and the need for VHA to continue business operations, VHA requested and was granted a 6-month waiver to allow for the continued transmission of sensitive information unencrypted within Vista. The waiver was approved on December 13, 2006 by the Assistant Secretary for Information and Technology (005). The waiver is not intended as a workaround for personally-identifiable information exchanged via Outlook messaging which can be protected using Public Key Infrastructure (PKI) certificates.

b. The waiver, which applies to electronic communications within the Vista Legacy Systems only, enables VHA facilities to exchange sensitive information including personally-identifiable information in clear text across VA's internal network. For HL7 transmissions and Vista messages that are auto-generated, there is no action that needs to be taken by facilities.

c. The approved waiver will be revisited at the end of the 6-month period to determine continued need if a Department-wide solution has not been identified to address VA policy requirements for secure communication of personally-identifiable information across VA's internal networks. Current guidance is maintained on the VHA Privacy website at:  
<http://vaww.vhaco.va.gov/privacy>.

**3. POLICY:** It is VHA policy that personally-identified information is not transmitted via the Vista Legacy Systems, unless governed by the waiver (see Att. A).

**4. ACTION**

a. **Facility Director.** For Vista messages generated by employees, volunteers, and other users of Vista systems, the facility Director is responsible for ensuring that the:

(1) Full name and full Social Security Number (SSN) are never used in the Subject Line of a Vista Mailman message with the exception of those messages generated automatically by the

**THIS VHA DIRECTIVE EXPIRES DECEMBER 31, 2011**

**VHA DIRECTIVE 2007-003**

**January 16, 2007**

VistA systems. First initial of last name and the last four numbers of the SSN may be used in the Subject Line of a VistA Mailman message to identify the patient and track the message.

(2) Full name and full SSN are only used in the body of a VistA Mailman message when needed for unique identification of a patient for purposes of providing care and treatment or for patient safety issues including notification of erroneous notes. Treatment purposes include the coordination of care between providers or within the multidisciplinary team, consultations, patient alerts, discharge planning, transferring the patient to another care team, etc.

(3) VistA Mailman messages containing personally-identifiable information are not forwarded, automatically by the system or manually, to MS Outlook or any other email messaging system.

**b. Other**

(1) The last name, last four numbers of the SSN, date of birth, other account numbers (e.g., bill number), and/or other identifying information may be used in the body of a VistA Mailman message for unique identification of a patient for all other payment and health care operation purposes, as defined in VHA Handbook 1605.1. Such purposes include coding, billing, insurance verification, registration, eligibility, peer review, quality assurance, and patient complaint resolution.

(2) The first initial of the last name and the last four numbers of the SSN may be used in the body of a VistA Mailman message for identification of a patient for purposes of law enforcement, public health reporting, and any other purpose authorized by law.

(3) Any other information related to the patient including demographics, diagnoses, and medical information may be used in the body of a VistA Mailman message for purposes of treatment, payment and/or health care operations.

**5. REFERENCES:** Memorandum on Risk-based Decision Regarding Transmission of Sensitive Data in Clear Text, dated December 13, 2006 (see Att. A).

**6. FOLLOW-UP RESPONSIBILITY:** The Office of Information (19) is responsible for the contents of this Directive. Questions may be directed to (727) 320-1839 or (518) 449-0604.

**7. RESCISSIONS:** None. This VHA Directive expires December 31, 2011.

Michael J. Kussman, MD, MS, MACP  
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**ATTACHMENT A**

**MEMORANDUM ON RISK-BASED DECISION REGARDING TRANSMISSION OF  
SENSITIVE DATA IN CLEAR TEXT**



Memo Risk-based  
Decision Regarding Tr