

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



# Veterans Health Administration

*Review of  
Alleged Mismanagement  
at the Massachusetts Veterans  
Epidemiology Research and  
Information Center*

December 17, 2014  
14-00517-54

## ACRONYMS AND ABBREVIATIONS

BHS	Boston Healthcare System
ISO	Information Security Officer
MAVERIC	Massachusetts Veterans Epidemiology Research and Information Center
MVP	Million Veteran Program
PHI	Personal Health Information
PII	Personally Identifiable Information
OIG	Office of Inspector General
ORD	Office of Research and Development
ORO	Office of Research Oversight
VA	Veterans Affairs
VHA	Veterans Health Administration

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# Report Highlights: Review of Alleged Mismanagement at VHA's Massachusetts Veterans Epidemiology Research and Information Center

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## Why We Did This Review

In August 2013, the Senate Committee on Veterans' Affairs provided the Office of Inspector General allegations that the Massachusetts Veterans Epidemiology Research and Information Center's (MAVERIC) security control weaknesses put veterans' personal information and other sensitive information at risk. It was also alleged that the Boston Healthcare System (BHS) leased off-site commercial office space for MAVERIC staff the complainant considered wasteful.

## What We Found

We substantiated the allegation that MAVERIC security control weaknesses put veterans' personal information and other sensitive information at unnecessary risk. In December 2013, we found hard-copy veterans' personal information and unencrypted portable data storage devices unsecured in MAVERIC office space. The Veterans Health Administration's (VHA) Office of Research Oversight (ORO) found similar issues in August 2013 when it conducted a review of BHS' research groups. In light of the issues identified during our review and by ORO, we concluded that BHS had not taken sufficient action to safeguard the confidentiality of veteran personal information.

This occurred because BHS did not establish sufficient oversight of MAVERIC physical security controls, such as ensuring secure storage of veterans' personal information and encryption of portable storage media.

We also substantiated the allegation that BHS leased off-site commercial office space, which we determined was underutilized. VA BHS entered into a 5-year lease totaling about \$938,000 without determining how much office space it needed and whether there was available VA space. As a result, we estimate VA BHS could spend about \$593,000 over the 5-year lease period for underutilized office space.

## What We Recommended

We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, improve oversight of MAVERIC physical security controls and implement a plan to maximize use of the off-site commercial space if continued need for the office space is justified.

## Agency Comments

The Director of the Veterans Integrated Service Network 1 concurred with our recommendations and provided acceptable action plans. We will follow up on implementation of the corrective actions.

A handwritten signature in black ink that reads "Linda A. Halliday".

LINDA A. HALLIDAY  
Assistant Inspector General  
for Audits and Evaluations

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## INTRODUCTION

### ***Allegations***

In August 2013, the Senate Committee on Veterans' Affairs provided the Office of Inspector General (OIG) a complainant's allegations that the Massachusetts Veterans Epidemiology Research and Information Center's (MAVERIC) security control weaknesses put veterans' personally identifiable information (PII), personal health information (PHI), and other sensitive information at risk. Additionally, it was alleged that VA Boston Healthcare System (BHS) leased off-site commercial office space for MAVERIC staff that the complainant considered wasteful.

We reviewed the merits of these two allegations by assessing physical security controls at MAVERIC office space on the VA BHS campus and the off-site leased space. We also attempted to determine whether VA BHS assessed the need for additional office space and justified the decision to lease off-site commercial office space.

### ***Background***

The Office of Research and Development (ORD) conducts research designed to improve health care for veterans. VA estimated it would spend over \$1.8 billion and allocate almost 3,500 full-time personnel to support over 2,200 VA research projects during fiscal year 2014. MAVERIC is a center within VA BHS that conducts VA-based population research relevant to veterans' needs. Since MAVERIC is part of VA, it is required to follow VA's information security requirements and policies.

### ***Million Veteran Program***

MAVERIC manages the Million Veteran Program (MVP), which is a national, voluntary, research program designed to identify how genes, lifestyle, and military exposures affect the health of veterans. MAVERIC staff collects and analyzes blood samples and health information from veteran volunteers. As of May 20, 2014, the Chief of Research Service at VA BHS reported that MVP had enrolled more than 274,000 veterans.

### ***Other Information***

- Appendix A provides additional background information pertinent to our review.
- Appendix B provides details on the scope and methodology for our review.
- Appendix C provides potential monetary benefits.
- Appendix D provides comments by the Director of the Veterans Integrated Service Network 1.

## RESULTS AND RECOMMENDATIONS

### Finding 1 **VA Boston Healthcare System Needs To Increase Oversight of MAVERIC Physical Security Controls**

We substantiated the allegation that veterans' PII, PHI, and other sensitive information is at unnecessary risk. During an inspection in December 2013, we found hard-copy PII and unencrypted portable data storage devices that were capable of transferring VA sensitive information unsecured in MAVERIC office space. We were provided an inspection report published by the Veterans Health Administration's (VHA) Office of Research Oversight (ORO) that found similar security weaknesses at BHS when it conducted a review in August 2013 of BHS' research groups. While the report was not specific to MAVERIC, it did describe numerous findings of noncompliance within BHS' research groups related to security of VA sensitive information and Information Systems. In light of the issues identified during our review and by ORO, we concluded that BHS had not taken sufficient action to safeguard the confidentiality of veterans' personal information.

Sensitive data was at unnecessary risk because BHS did not establish sufficient oversight of MAVERIC physical security controls, such as ensuring secure storage of veterans' personal information and encryption of portable storage media.

As a result, veterans' PII, PHI, and other sensitive information are at unnecessary risk of loss and unauthorized disclosure. Further, while veterans are willing to participate in research studies, they may only do so with assurances that VA will protect and safeguard their personal information. Reduced volunteer participation in MVP could hinder or potentially slow advancements in medical science intended to improve health and enhance the quality of life for veterans.

#### **VA's Information Security Requirements**

VA Handbook 6500 establishes the foundation for VA's information security program. The handbook details information security policies, procedures, and controls that apply to all VA employees, including researchers. The handbook includes the following criteria:

- Provides requirements to protect the confidentiality, integrity, and availability of information (hard-copy and electronic) created, processed, stored, aggregated, and transmitted
- Requires VA employees, contractors, and volunteers to protect hard-copy information and portable systems by storing it in locked desks or file cabinets when not in use

- Directs that all devices, such as laptops, thumb drives, and other portable data storage devices, used to transmit and store VA information outside of VA's protected environment must use approved encryption

***Sensitive Data  
at Risk***

We substantiated the allegation that veterans' PII, PHI, and other sensitive information is at unnecessary risk. During an inspection in December 2013, we found hard-copy PII and unencrypted portable data storage devices that were capable of storing veteran personal sensitive information unsecured in MAVERIC office space.

***Hard-copy PII  
Unsecured***

Despite VA policy requiring the safeguarding of the confidentiality, integrity, and availability of personal information, we found hard-copy sensitive data unsecured in two out of three MAVERIC office spaces we inspected. The unsecured hard-copy data contained PII, such as names, Social Security numbers, and dates of birth. While there was some level of restricted access to MAVERIC's office space, unsecured sensitive data is at unnecessary risk because contractors and other employees can gain access to the space.

ORO conducts compliance oversight reviews of VHA's research program, which includes safety, laboratory security, and information protection. In August 2013, ORO conducted an oversight review of research groups at VA BHS. ORO found study binders containing PHI that were not in use, but were stored on open shelves and in unlocked cabinets within research office space. ORO briefed BHS on its finding and in October 2013 issued a report requiring VA BHS to ensure that BHS secured binders and files identified during its review and restrict access to only authorized individuals.

Even though ORO did not report issues identified with specific research groups, ORO's general findings were consistent with some of the physical security control issues identified during our December 2013 inspection. Based on the issues identified during our review and by ORO, we concluded that BHS had not taken sufficient action to safeguard the confidentiality of veterans' personal information.

***Portable Data  
Storage  
Devices  
Unsecured***

We found unencrypted portable data storage devices capable of transferring research data unsecured in MAVERIC office space. These devices included eight personal computers/laptops and four personal thumb drives. We also found other unencrypted storage media, such as a hard drive and several CDs/DVDs.

The BHS Information Security Officer (ISO) conducted an initial review of the unencrypted portable data storage devices to determine what types of information was stored on the devices. The ISO identified personal files, photographs, software, and work-related files. However, the ISO did not identify sensitive veteran information. Additionally, we conducted our own review of a few of the devices, including laptop computers. While neither



the ISO nor the OIG found sensitive veteran personal information on the devices reviewed, the existence of these unencrypted devices within MAVERIC office spaces increases the risk of loss of veteran personal sensitive information and access by unauthorized individuals.

The following figure shows various types of unencrypted portable data storage devices that were in unsecured locations during our inspection of MAVERIC office space.

**Figure. Unsecured Portable Data Storage Devices**



*Source: VA OIG; Leased Space, Boston, MA; 3:19 p.m.; December 16, 2013*

**Causes for Sensitive Data Risks**

Sensitive data was at unnecessary risk because VA BHS did not establish sufficient oversight of MAVERIC physical security controls, such as ensuring secure storage of veterans' personal information and encryption of portable storage media. We determined the BHS ISO did not have access to MAVERIC office space. One VA BHS official stated the local ISOs did not have physical access to any office space within the VA BHS other than their own offices, and additional physical access was not an expectation of the ISO's position. We determined this compromised the ISO's ability to conduct periodic, independent, and unannounced physical security reviews. ISOs should conduct physical security reviews of all VA or contractor-operated offices to ensure compliance with VA security policies. We concluded the ISO could not effectively perform these duties without

**Figure 1**

physical access to all MAVERIC office space.

**Effects of Sensitive Data Risks**

VA information security requirements protect the confidentiality, integrity, and availability of sensitive personal information. Without effective oversight of MAVERIC physical security controls, veterans' personal information will continue to be at unnecessary risk of loss and unauthorized



disclosure. The consequence of inadequate oversight can be the loss of trust by veterans and lack of their participation in MVP for fear of becoming victims of identity theft. While veterans are willing to participate in research studies, they may only do so with assurances that VA will protect and safeguard their personal information. Reduced volunteer participation in MVP could hinder or potentially slow advancements in medical science intended to improve health and enhance the quality of life for veterans.

### **Conclusion**

Beyond its fundamental mission of providing benefits and services to veterans, VA has the opportunity to use veterans' medical data to achieve advancements in medical research and health care services. However, sensitive veteran information is susceptible to unauthorized access, loss, or disclosure without effective information security controls and oversight. It is vital for VA BHS to improve MAVERIC's physical security controls to protect the personal information of more than 274,000 veterans who have reportedly enrolled in MVP, as well as future enrollees.

### **Recommendations**

1. We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, improve oversight controls to ensure Massachusetts Veterans Epidemiology Research and Information Center staff protects all veteran personal information in accordance with VA policy.
2. We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, ensure that portable storage devices used by the Massachusetts Veterans Epidemiology Research and Information Center are encrypted.
3. We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, ensure VA Boston Healthcare System Information Security Officers have full access to all VA Boston Healthcare System office space, including all Massachusetts Veterans Epidemiology Research and Information Center office space, in order to perform their oversight responsibilities.
4. We recommended the Director of Veterans Integrated Service Network 1 develop an oversight and monitoring plan to ensure Massachusetts Veterans Epidemiology Research and Information Center staff comply with VA's information security requirements.

For recommendations 1–3, we consider Veterans Integrated Service Network 1 as having the primary responsibility for developing and

implementing corrective action plans and providing status updates to the OIG.

**Management  
Comments**

The Director of the Veterans Integrated Service Network 1 concurred with our recommendations and plans to address them by February 2015. To address recommendations 1–4, the Director provided planned corrective actions, which include the following.

- Develop and implement a plan whereby ISOs will have full access to all areas of the Boston Healthcare System, including MAVERIC, without need to obtain approval from Service Chiefs or personnel in the secure areas.
- A team from Office of Information and Technology will visit MAVERIC, review its current information security plan and practice, and make recommendations for improvement.
- MAVERIC staff will complete additional training focused on standards for protection of hard copy sensitive data.
- ISOs will implement monthly unannounced environmental rounds of the MAVERIC offices with particular focus on adherence to policy of hard copy sensitive information.

Appendix D provides the full text of the Director's comments.

**OIG Response**

The Veterans Integrated Service Network 1 Director provided a responsive action plan. We will monitor the Veterans Integrated Service Network's progress and follow up on implementation of corrective actions until the proposed actions are completed. We note, however, that the hard-copy personal information we identified and reported on did not include the *Curriculum Vitae* of job applicants, as reported by the Director. The information we identified included personally identifiable information, such as names, Social Security numbers, and dates of birth that may have belonged to veterans. Further, we did not conclude that unencrypted portable devices had not been connected to VA networks, as reported by the Director. We did not have any way of determining whether MAVERIC employees connected these devices to VA networks in the past.

## **Finding 2      VA Boston Healthcare System Needs To Better Justify the Continued Funding of Leasing Office Space**

We substantiated the allegation that VA BHS leased off-site commercial office space for MAVERIC staff, which we determined was underutilized. BHS did not justify the need or cost to relocate some MAVERIC staff to off-site commercial office space in Boston, MA. VA BHS entered into a 5-year lease totaling about \$938,000 for 10,425 square-feet of off-site commercial office space without adequately assessing alternative administrative office space options, including determining how much office space MAVERIC actually needed and whether there was available VA space. Without an adequate assessment of need and reviewing other office space options, VA BHS demonstrated a lack of financial stewardship when funds could have been put to better use within the healthcare system.

According to a VA BHS employee, once VA BHS leased the commercial office space, there were delays in relocating MAVERIC staff that resulted in the leased space being unoccupied for about 14 months at a cost of \$15,638 a month, or a total of approximately \$219,000 in lease payments. We also determined that VA BHS solicited office space for 67 employees; however, no more than 32 staff had occupied the leased space during the first 2 years of the lease, which means the leased space was about 52 percent underutilized.

This occurred because VA BHS did not determine office space needs and fully assess available VA office space before executing the lease agreement. As a result, we estimate BHS could spend about \$593,000 over a 5-year period for underutilized commercially leased office space when other, more economical options may have been available.

***Lack of  
Justification,  
Delays, and  
Underutilization***

The VA BHS Director approved a request, dated February 24, 2011, to lease administrative off-site commercial office space for BHS research staff, which included MAVERIC staff. The Director approved the request to lease office space to accommodate 67 staff. However, VA BHS could not provide adequate documentation to justify the need for this space prior to the Director's approval. Despite the lack of justification, VA BHS entered into a 5-year lease agreement from January 1, 2012, through December 31, 2016, with a monthly lease payment of \$15,638. Based on documentation provided by VA BHS and MAVERIC employees, we determined that no more than 32 MAVERIC staff had occupied the commercially leased space during the first 2 years of the lease.

***Justification of  
Need Not  
Available***

VA BHS staff could not provide us documentation that would demonstrate they conducted an adequate assessment to determine the need for additional office space prior to executing the lease. We requested documentation regarding how many MAVERIC employees there were prior to the lease, as

well as the number of MAVERIC employees who needed to be relocated. In addition, we requested documentation to determine whether VA BHS assessed space needs and evaluated other VA office space, such as options within BHS facilities, prior to executing the lease agreement. VA BHS informed us that this documentation did not exist, which if available, could have provided BHS management viable options to make better business decisions.

The United States Government Accountability Office's *Standards for Internal Control in the Federal Government* state that controls are an integral part of an organization's planning, implementing, reviewing, and accounting for Government resources and achieving effective results.

*Delays in Relocating Employees*

Despite the lack of an adequate needs assessment, the Director of BHS approved a request, dated February 24, 2011, to lease off-site commercial office space. The approval document noted that the "space is urgently needed and therefore the start date would be as soon as possible, hopefully the next 90 days." VA BHS submitted a solicitation for offers for office space that would accommodate 67 employees. On January 1, 2012, VA BHS entered into a 5-year lease for commercial office space with lease payments totaling about \$938,000.

Even though the Director's approval stated that the Research Program within VA BHS needed the space urgently, a VA BHS employee reported there were significant delays in relocating research staff once the lease agreement was in place. According to a VA BHS official, the office space was unoccupied for about 14 months after the space became available for occupancy. VA BHS made monthly lease payments totaling about \$219,000 during this 14-month period. As a result, we question the urgency of the original request.

*Leased Space Underutilized*

The commercial lease provided office space for 67 staff, which was consistent with the needs detailed in the solicitation for offers. However, since executing the lease agreement, VA BHS has not fully utilized the office space. We requested information on how many MAVERIC employees have occupied the office space. We received various occupancy rates ranging from 22 to 32 MAVERIC staff since BHS entered into the lease.

We concluded that VA BHS has not fully utilized the leased office space. Since the commercial lease provided office space for 67 staff, we determined that if 32 MAVERIC staff occupied the space, about 52 percent of the leased space is underutilized. This occurred because BHS did not implement a plan to maximize the use of the off-site commercial office space.

**Effects of Lack of Justification, Delays, and Underutilization**

VA BHS spent about \$219,000 for off-site commercial office space from January 2012 through February 2013, which according to a VA BHS employee, was unoccupied. Further, based on documentation provided by VA BHS, we determined no more than 32 MAVERIC staff had occupied the office space during the first 2 years of the lease. As a result, if VA BHS does not implement a plan to maximize use of the office space, it could spend a total of about \$593,000 on off-site commercial office space that may be underutilized over the course of the 5-year lease. BHS needs a plan to use these funds more effectively to meet the health care needs of our veterans.

**Conclusion**

VA BHS did not adequately justify the need for additional MAVERIC office space prior to executing a commercial lease for office space. Properly assessing space needs and considering all possible office space options, including other VA space, could have prevented VA BHS from paying for underutilized office space and demonstrated appropriate stewardship of government funds.

**Recommendation**

5. We recommended the Director of Veterans Integrated Service Network 1 implement a plan to maximize use of the off-site commercial space if continued need for the office space is justified.

**Management Comments**

The Director of the Veterans Integrated Service Network 1 concurred with our recommendation and plans to address it by February 2015. To address the recommendation, the Director provided planned corrective actions, which include the following:

- The Director of VA Boston Healthcare System will be asked to prepare an analysis quantifying MAVERIC's current and future space needs, including an assessment of options for meeting its needs.
- A task force will be appointed to implement and track a plan to fully utilize the off-site commercial space in an expedited manner.

Appendix D provides the full text of the Director's comments.

**OIG Response**

The Veterans Integrated Service Network 1 Director provided a responsive action plan. We will monitor the Veterans Integrated Service Network's progress and follow up on implementation of corrective actions until all proposed actions are completed.

## Appendix A Background

### *Office of Research and Development*

ORD's fundamental mission is to advance the health care of veterans through medical research. Sharing of PII and PHI is instrumental to ensuring success of continued studies and further advancements in medical research. As such, effective information security practices are critical for protecting this research data, particularly among VA and its research partners.

### *Office of Information and Technology*

The Office of Information and Technology develops, implements, and oversees the policies, procedures, training, communication, and operations related to improving how the VA and its partners safeguard PII of veterans and VA employees. Its objective is to assure the confidentiality, integrity, and availability of information and information systems.

### *Information Security Officers*

ISOs should conduct physical security reviews of all VA or contractor-operated offices to ensure compliance with VA security policies.

### *Additional Information on MAVERIC*

The VA Cooperative Studies Program, one of ORD's research services, is responsible for planning and conducting large multicenter clinical trials and epidemiological studies within VA. MAVERIC is located in Boston, MA, and is 1 of 5 Cooperative Studies Program centers nationwide. In 1997, MAVERIC was established as one of three epidemiological research centers to conduct observational, population-based research. There are multiple research programs under the purview of MAVERIC, including MVP. In fiscal year 2013, VA reported that ORD provided MAVERIC funding of about \$16.8 million with just over \$5.3 million related to MVP.

### *Additional Information on MVP*

MVP is a national, voluntary, research program that collaborates with veterans receiving care in the VA Healthcare System to study how genes, lifestyle, and military exposures affect their health. VA reports that data collected from MVP will be stored anonymously for research on diseases such as diabetes and cancer, and military-related illnesses.

## Appendix B Scope and Methodology

### *Review Scope*

We conducted our review work from November 2013 through June 2014. The review focused on issues raised in allegations received by the OIG through the Senate Committee on Veterans' Affairs in August 2013. We focused on two potential issues described in the allegation that we determined to be higher risk.

- MAVERIC put veterans' PII, PHI, or other sensitive information at risk.
- VA BHS leased off-site commercial space for MAVERIC staff that the complainant considered wasteful.

### *Methodology*

In order to assess the issues raised in the allegation, we conducted unannounced inspections of three MAVERIC office spaces to assess physical security controls. Specifically, we checked file cabinets, unoccupied offices, and unlocked desk drawers to ensure that MAVERIC complied with VA's security requirements. When we identified unsecured portable data storage devices, we turned them over to the BHS ISO. The ISO inspected the equipment for veterans' sensitive data and provided the OIG with the results of the inspection. Additionally, we notified the ISO of unsecured sensitive hard-copy data discovered during our inspections.

We conducted interviews with ORD, Office of Information and Technology, and VA BHS staff to obtain information necessary to assess the allegations. Additionally, we reviewed documents related to the relocation of some MAVERIC employees to commercially leased space.

### *Calculation of Underutilized Space*

In order to determine the total estimated cost of underutilized off-site commercial office space over the course of the 5-year lease, we calculated as follows.

- For the period January 2012 through February 2013, VA BHS reported that the office space was unoccupied. The monthly lease payment for the office space is about \$15,638, which multiplied by 14 months, equals \$218,932.
- For the period March 2013 through December 2013, VA BHS and MAVERIC employees could not provide documentation showing more than 32 MAVERIC staff had occupied the commercially leased space. Since the lease provided office space that would accommodate 67 employees, we determined that the office space was about 52 percent underutilized during this period. The monthly lease payment of about \$15,638, multiplied by 52 percent, multiplied by 10 months, equals \$81,318.



- For the final three years of the lease, if VA BHS does not implement a plan to maximize use of the office space, it could remain about 52 percent underutilized. The monthly lease payment of about \$15,638, multiplied by 52 percent, multiplied by 36 months, equals \$292,743.

Taken together, we estimate VA BHS could spend about \$593,000 over the 5-year lease period for underutilized office space.

**Fraud  
Assessment**

The review team assessed the risk that fraud, violations of legal and regulatory requirements, and abuse could occur during this review. We exercised due diligence in staying alert to any fraud indicators by taking actions, such as:

- Soliciting the OIG's Office of Investigations for fraud indicators
- Conducting steps to review MAVERIC operations for potential fraud

We did not identify any instances of fraud during this review.

**Government  
Standards**

We conducted this review under the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency in January 2012.

**Appendix C Potential Monetary Benefits in Accordance With Inspector General Act Amendments**

Recommendation	Explanation of Benefits	Better Use of Funds	Questioned Costs
5	Money spent on unused or underutilized commercially leased space	\$593,000	\$0
<b>Total</b>		<b>\$593,000</b>	<b>\$0</b>

## Appendix D Veterans Integrated Service Network 1 Director's Comments

### Department of Veterans Affairs

### Memorandum

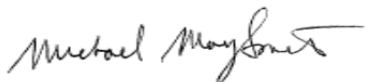
**Date:** November 24, 2014

**From:** Director Veteran Integrated Service Network 1

**Subject:** Draft Report – Review of Allegations at the Massachusetts Veterans Epidemiology Research and Information Center

**To:** Assistant Inspector General for Audits and Evaluations (52)

1. I concur with the report recommendations.
2. If you have any questions regarding our response and actions to the recommendations in the draft report, please contact me at (781) 697-4821.



Michael F. Mayo-Smith, MD, MPH

Attachment

**Network Director's Comments to the Office of Inspector General's (OIG) Report**

**VETERANS HEALTH ADMINISTRATION (VHA)  
Action Plan**

**Office of Inspector General, Veterans Health Administration, Review of Allegations at the Massachusetts Veterans Epidemiology Research and Information Center**

**Date of Draft Report: September 11, 2014**

<b>Recommendations/ Actions</b>	<b>Status</b>	<b>Completion Date</b>
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**Recommendation 1. We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, improve oversight controls to ensure Massachusetts Veterans Epidemiology Research and Information Center staff protects all veteran personal information in accordance with VA policy.**

**Comments:** Concur

Veterans Integrated Service Network (VISN) 1, VA Boston Healthcare System, the Boston Veterans Administration (VA) Research Service, and most of all the Massachusetts Veterans Epidemiology Research and Information Center (MAVERIC), take the issue of information security with the highest concern. We keenly feel the responsibility of safeguarding healthcare and research data entrusted to us by our Veterans. MAVERIC is a research center that has extensive data resources and responsibilities. It is the coordinating center of the Million Veteran Program, a program with high national and international visibility. This work includes the management of genetic information for hundreds of thousands of Veterans. Indeed for MAVERIC staff, safeguarding this information is viewed as nothing less than a sacred duty owed to the Veteran community. We welcome the recommendations of the OIG as they provide guidance on how we can further strengthen the security of the information with which we have been entrusted.

The OIG team report two instances of where the team found hard copy sensitive data. In these two instances sensitive data was not fully secured according to VA policy. Safeguarding personally identifiable information (PII) is of the utmost priority, whether Veteran or employee. This OIG report identified an opportunity to strengthen information security and VA Boston Healthcare System needs to take additional actions to improve protection of hard copy sensitive data.

The VISN 1 director was reassured; however, that in neither of the two instances was research data involved. In the first instance, personal health information (PHI) found by the OIG official was located in an office space occupied by a physician who was not part of MAVERIC and had no relationship to MAVERIC. Due to severe space constraints at the Jamaica Plain campus he had been temporarily relocated to this space due to construction. The PHI was not MAVERIC clinical or research data. It was clinic notes from many years ago used for teaching medical students. The physician had no access to MAVERIC clinical or research data. The second instance involved the identification of Curriculum Vitae of job applicants that were found at a desk at the off-site location. Thus throughout the OIG inspection no breach of research information was identified and research data in MAVERIC was appropriately secured. The details above are provided not to excuse the findings described but to reassure the public and Veteran community regarding the security of MAVERIC's research data. The following actions will be taken to address recommendation 1:

- The VA Boston Information Security Officer (ISO) will implement monthly unannounced environmental rounds of the MAVERIC offices with particular focus on adherence to policy of hard

copy sensitive information. This will supplement the twice weekly environmental rounds of the MAVERIC space already conducted by the VA Boston Privacy Officer (PO) for this purpose and the weekly Environment of Care rounds already conducted by the ISO.

Status  
In process

Target date for completion:  
January 2015

- A team from Office of Information and Technology (OIT) Information Security from outside Region 4 will visit MAVERIC and review its current information security plan and practice. The team will present its findings and recommendations to the Director VA Boston Healthcare System, Director of VISN 1, Director OIT Region 4, and Deputy Assistant Secretary for Information Security/Chief Information Security Officer.

Status  
In process

Target date for completion:  
February 2015

- MAVERIC offices represent an area where enhanced information security practices are expected. VA Boston will relocate any non-research employees from MAVERIC offices. In the future it will not allow utilization of MAVERIC space to house employees from outside the research service.

Status  
In process

Target date for completion:  
January 2015

- MAVERIC staff will complete additional training focused on the standards for protection of hard copy sensitive data besides PHI and research data.

Status  
In process

Target date for completion:  
January 2015

**Recommendation 2. We recommended the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, ensure that portable storage devices used by the Massachusetts Veterans Epidemiology Research and Information Center are encrypted.**

**Comments:** Concur

It was of concern to the VISN 1 director that OIG reported that unencrypted portable storage devices were found unsecured in MAVERIC office space. In follow up VISN 1 asked the Boston ISO staff to assess the status of these devices. The VISN 1 director subsequently learned that per Handbook 6500 Information Security, portable storage devices must receive multiple levels of approval and then be configured by the facility Chief Information Officer (CIO) in order to allow transfer of VA information from VA networks to these devices. This configuration is only possible with advanced permissions, which are held only by ISOs. None of these devices identified were being used for U.S. Government business, none had been configured by the ISO, and none were capable of being connected to VA networks. It was therefore not possible to download research data or any other data from VA networks to these devices. The OIG report accurately notes that none of these unencrypted portable storage devices had been connected to VA networks or contained VA sensitive information.

The devices such as the personal laptops, CDs and thumb drives identified, as well as, tablets and smart phones, meet criteria for portable data storage devices, are ubiquitous in today's society and are commonly found across VA facilities. VA Information Security Policy does not prohibit the presence of such unencrypted data storage devices within VA facilities, including research offices. These policies do not categorize the presence, *per se*, of devices such as those identified as representing an increased risk for loss of Veterans sensitive information. VA information security policy focuses on ensuring that such devices are allowed to connect to VA databases only after passing through a

rigorous process with multiple safeguards. Encryption is one of these safeguards and VISN 1 fully supports the OIG's recommendation that careful encryption of such devices is ensured.

In response to recommendation 2:

- The Boston ISO will be requested to confirm that all portable storage devices used by MAVERIC are encrypted.

Status	Target date for completion:
In process	January 2015

- The Boston ISO will reissue to all MAVERIC staff VHA Office of Research and Development (ORD) guidelines/framework for ISO oversight and monitoring of research data to OIT, VA research offices, and facility ISOs. The ISOs have been directed, via Federal Supply Schedule (FSS) Bulletin 149, to assist ORD in evaluating local compliance with the guidelines/framework.

Status	Target date for completion:
In process	January 2015

**Recommendation 3. We recommend the Director of Veterans Integrated Service Network 1, in conjunction with the Office of Information and Technology, ensure VA Boston Healthcare System Information Security Officers have full access to all VA Boston Healthcare System office space, including all Massachusetts Veterans Epidemiology Research and Information Center office space, in order to perform their oversight responsibilities.**

**Comments:** Concur

VA Handbook 6500 clearly outlines the roles and responsibilities of the ISO in the protection of the VA enterprise network. The ISO is VA's front line defense to the protection and integrity of our systems and data. It is imperative that ISOs, in conjunction with local CIOs and Privacy Officers, conduct both regularly scheduled and unannounced Environment of Care (EOC) rounds. EOC rounds provide the ISOs opportunity to address discrepancies in real time and provide OIT leadership with vital information regarding the current state of the VA's enterprise security posture. Analysis of the EOC rounds provide further information to outline best practices and identify areas of the enterprise defense that need attention.

Director of VA Boston Healthcare System will develop and implement a plan whereby ISOs will have full access to all areas of the Boston Healthcare System, including MAVERIC, in coordination with the Police Service and in accordance with VA Directive 0730, Security and Law Enforcement, and VA Handbook 6500, *Risk Management Framework for VA Information Systems*. This plan will allow Information Security Officers to access areas without need to obtain approval from the Service Chiefs or personnel of the secure areas.

Status	Target date for completion:
In process	January 2015

**Recommendation 4. We recommend the Director of Veterans Integrated Service Network 1 develop an oversight and monitoring plan to ensure Massachusetts Veterans Epidemiology Research and Information Center staff comply with VA's information security requirements.**

**Comments:** Concur

A team from OIT Information Security from outside Region 4 will visit MAVERIC and review its current information security plan and practice. The review will include recommendations on oversight and monitoring activities additional to those already in effect to ensure MAVERIC continues to be in full compliance with VA information security requirements. The team will present its findings and

recommendations to the Director VA Boston Healthcare System, Network Director VISN 1 and Director OIT Region 4.

Status In process	Target date for completion: February 2015
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**Recommendation 5. We recommended the Director of Veterans Integrated Service Network 1 implement a plan to maximize use of the off-site commercial space if continued need for the office space is justified.**

**Comments:** Concur

In 2011, the VA's Strategic Capital Investment Planning (SCIP) process identified a projected space gap for 2013 of 263,404 square feet for research at Boston including 190,649 square feet for the programs at the Jamaica Plain campus. SCIP is based on well-established nationally developed standards and guidelines for space needs. VA Boston Healthcare System used this data in its decision to pursue leased space. However, as noted by OIG, this decision was not accompanied by a documented assessment and analysis of other options. Given the expense involved such an analysis was warranted.

The major factor in the delay of utilization of the leased space was the fact that OIT is forbidden by federal law and regulation from initiating several key steps for installing IT equipment until a lease is actually signed and the property is under control of the Federal government. Fully equipping a new research facility that requires the highest level of information security takes longer than standing up a similar non-IT research facility. Multiple steps by multiple parties were required to evaluate, plan and execute the installation of complex IT infrastructure for this center. These delays were extremely frustrating to both the VHA and OIT staff, but the etiology of the delays would not be apparent to observers not directly involved. As stated earlier, MAVERIC is an information intensive research center, and cannot carry out its mission without needed IT support being in place. Even urgent needs cannot be met until working space is appropriately configured to ensure the operability and security of computer and communications systems. As required IT infrastructure became available, increasing numbers of staff have moved and are now utilizing the new space.

In response to Recommendation 5:

- Director of VISN 1 will ask the Director of VA Boston Healthcare System to prepare an analysis quantifying MAVERIC current and future space needs and assessing options for meeting these needs, including the option for utilizing other VA space.

Status In process	Target date for completion: February 2015
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- Director of VISN 1, Director of Boston VA Healthcare System, and CIO of VISN 1 will appoint a task force to develop and implement a plan to fully utilize the off-site commercial space in an expedited manner, and track the implementation of that plan to completion with regular reports to the appointing officials.

Status In process	Target date for completion: January 2015
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## Appendix E Office of Inspector General Contact and Staff Acknowledgments

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OIG Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Acknowledgments	Nick Dahl, Director Stephen Bracci Michael Derick David Orfalea Ann Wolf
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