



DEPARTMENT OF VETERANS AFFAIRS
Veterans Benefits Administration
Washington, D.C. 20420

July 31, 2024

OBI Letter 20C-24-03

Director (00)

All Veteran Benefits Administration (VBA) Services, District Offices, Regional Offices, Staff Offices, and Centers

SUBJ: Prohibition of Access to One's Own Veteran Benefits Records Through VBA Claims Processing Applications

1. Purpose

This letter prohibits the access of one's own Veteran benefits records through VBA claims processing applications. This guidance supplements existing policy outlined in VBA Letter 20-23-02, VBA Privacy Program Implementation, as well as guidance provided in VA Directive 6500, "VA Cybersecurity Program," VA Directive 6502, "VA Enterprise Privacy Program," and VA's National Rules of Behavior regarding access to records containing Personally Identifiable Information (PII).

2. Background

VA Directive 6502, VA Enterprise Privacy Program, requires all VBA systems users access records containing PII solely when the information is required to carry out their official duties. VA's Rules of Behavior, signed by all systems users prior to obtaining access, include that users shall only use access for "authorized and official duties, and to only access data that is needed in the fulfillment of" those duties.

Free and unfettered access to one's own Veteran benefits record is prohibited within VBA claims processing systems. Veterans whose occupation and official duties require access to VBA systems are in positions that assume the public's trust to carry out their duties in an official and professional manner. Occupying an official position of public trust does not provide an advantage to use the access afforded to one's position for personal gain. Veteran records within VBA systems frequently contain PII of other individuals, including the names of VBA employees who have worked on the record. Accessing a record within a VBA system allows access to PII which would otherwise be redacted if the record were obtained through a Privacy Act (PA) request or Freedom of Information Act (FOIA) request. In addition to ensuring Veteran privacy, VBA is also responsible for ensuring the privacy of claims processors and other authorized personnel whose personal information may be

associated to a particular record as a standard part of benefits processing and claim decisions.

3. Policy

Directly viewing one's own benefit records within any VBA claims processing application is strictly prohibited under all circumstances. This policy applies to all VBA systems users, including, but not limited to, VA employees, Powers of Attorney (POAs), Office of Inspector General, Board of Veteran Appeals, other Federal or State agencies, and authorized VA contractors. Access to one's own benefit records must be obtained through means available to Veterans in the general public and do not occupy positions that provide access to VBA systems, such as through a PA or FOIA request or through a personal account at <https://www.va.gov>.

Prohibited "direct viewing" includes any method that would allow a user to physically access their own record as it exists within a VBA system, including, but not limited to:

- VBA systems users viewing their own record utilizing their own account.
- VBA systems users viewing their own record utilizing another authorized user's account credentials.
- POAs assigned to their own record as a "self-representative."

This guidance does not impact access to any information which is available to Veterans in the general public (i.e., Veterans who do not have access to VBA systems), such as that which may occur through communication with a POA, a Public Contact office, or National Call Center. This ensures more equitable access to records for all Veterans regardless of occupation, minimizing any appearance or perception of special privilege or conflicts of interest. This guidance also ensures all PA and FOIA requests are provisioned through the official process to ensure the privacy of individuals whose PII is contained within the record.

Accesses are regularly audited locally using Common Security Service reporting capabilities as well as VBA systems data extracts. Privacy or security violations resulting from accessing one's own or another individual's record without a legitimate business need may result in loss of access to VBA systems and/or disciplinary action as determined by local leadership.

Veterans, dependents, and beneficiaries may submit FOIA and PA requests electronically following guidance available through the [Department of Veterans Affairs Freedom of Information Act site](#) or a written request that states you would like a copy of your records submitted to the VA FOIA Act Services via mail (Department of Veterans Affairs Freedom of Information Act Services (005R1C) 811 Vermont Avenue, NW, Washington, DC 20420), for inquiries regarding FOIA or PA requests, contact FOIAHelp@va.gov.

4. Questions

Questions regarding this policy can be directed to Office of Business Integration Benefits Systems Management Division (BSM.VBACO@va.gov) and/or Office of Field Operations Restricted Portfolio Management team (VBA.RPM@va.gov).

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Office of Business Integration