UNITED STATES DEPARTMENT OF VETERANS AFFAIRS

Evaluating Holdings of Personally Identifiable Information (PII) and Eliminating Unnecessary Collections at the Department of Veterans Affairs

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EVALUATING HOLDINGS OF PERSONALLY IDENTIFIABLE INFORMATION (PII) AND ELIMINATING UNNECESSARY COLLECTIONS AT THE DEPARTMENT OF VETERANS AFFAIRS

Overview

This is the Department of Veterans Affairs (VA) annual report to the Office of Management and Budget (OMB) on VA's efforts to eliminate the unnecessary collection and use of Personally Identifiable Information (PII). VA is committed to reducing the unnecessary collection and use of PII wherever feasible, and is devoting considerable resources to do so. VA began its efforts before the May 22, 2007, publication of OMB Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information.* It required Federal agencies to develop and implement a breach notification policy within 120 days while ensuring proper safeguards are in place to protect the information, and to develop policies concerning the responsibilities of individuals authorized access to PII.

VA's mission is to serve America's veterans and their families with dignity and compassion, to be their principal advocate, and to ensure that they receive the medical care, benefits, and lasting memorials for which they are eligible because of their service to our Nation. VA is the second largest Federal Department, with over 235,000 employees. As advocates for veterans and their families, VA employees are committed to providing world-class service in the provision of benefits.

VA comprises a Central Office (VACO), located in Washington, DC, and field facilities throughout the United States, Puerto Rico, Guam and the Philippines (Note: check this list for complete accuracy) administered by its three major line organizations: the Veterans Health Administration (VHA), the Veterans Benefits Administration (VBA), and the National Cemetery Administration (NCA). VA provides services and benefits through a nationwide network of 155 hospitals, 881 outpatient clinics, 135 nursing homes, 46 residential rehabilitation treatment programs, 207 readjustment counseling centers, 57 veterans' benefits regional offices, and 125 national cemeteries (Note: check figures just before final document goes forward). The current population of potential VA customers is almost 24 million veterans.

In response to OMB Memorandum 07-16, VA initiated an Enterprise-wide effort to identify and evaluate its holdings of all types of PII and to eliminate all unnecessary collections. As one of the largest Federal agencies, VA currently retains a vast store of personal information. VA's initial focus was on the unnecessary collection and use of Social Security Numbers (SSN). The PII effort is built on the lessons learned in implementing VA's SSN reduction efforts and extends into the unnecessary collection of all PII including Protected Health Information (PHI), Home Telephone Numbers, Personal E-mail Addresses, Mother's Maiden Name, etc.

VA collects and maintains PII in both paper and electronic format. This information serves two functions: (1) distinguishing between veterans with similar names, and (2) verifying the identity of veterans seeking service and/or benefits. VA must be particularly careful that changes in PII do not effect timely provision of benefits and services to veterans. VA assembled a partial list of VA forms, systems, and processes containing PII. Over 800 items on the list contain SSN, ranging from small uses such as Physical Access Controls, to larger applications, such as SSNs used in the Veterans Health Information Systems and Technology Architecture (VistA).
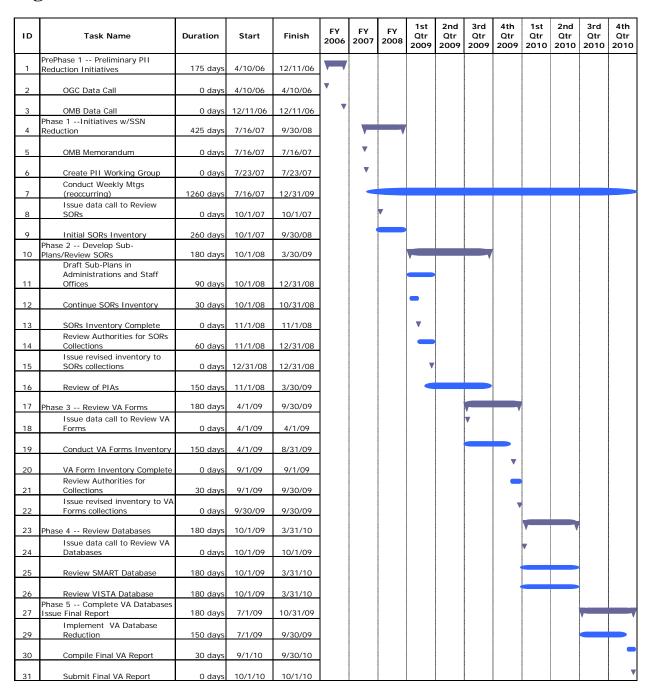
The scope of the VA Enterprise-wide effort also includes substantial coordination and interface with a number of other Federal agencies with which VA works. These agencies include the Social Security Administration (SSA), the Internal Revenue Service (IRS), the Department of Defense (DoD), and the Department of Education (ED). This effort also requires internal coordination between VA facilities.

When eliminating PII now collected from any particular form or system, VA is carefully considering the following:

- Systems in which PII is contained;
- Purpose served by collection and the uses of PII;
- Other forms populated using the form or system originally used for the collection;
- System interfaces;
- Costs and timeline for any modification; and
- Policies or processes that must be changed as a result of the elimination.

Figure 1 illustrates the preliminary plan to evaluate holdings of PII within VA and to eliminate unnecessary collections.

Figure 1: **VA's Five-Phase Plan**

ID	Task Name	Duration	Start	Finish	FY 2006	FY 2007	FY 2008	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009	1st Qtr 2010	2nd Qtr 2010	3rd Qtr 2010	4th Qtr 2010
1	PrePhase 1 -- Preliminary PII Reduction Initiatives	175 days	4/10/06	12/11/06											
2	OGC Data Call	0 days	4/10/06	4/10/06											
3	OMB Data Call	0 days	12/11/06	12/11/06											
4	Phase 1 --Initiatives w/SSN Reduction	425 days	7/16/07	9/30/08											
5	OMB Memorandum	0 days	7/16/07	7/16/07											
6	Create PII Working Group	0 days	7/23/07	7/23/07											
7	Conduct Weekly Mtgs (reoccurring)	1260 days	7/16/07	12/31/09											
8	Issue data call to Review SORs	0 days	10/1/07	10/1/07											
9	Initial SORs Inventory	260 days	10/1/07	9/30/08											
10	Phase 2 -- Develop Sub-Plans/Review SORs	180 days	10/1/08	3/30/09											
11	Draft Sub-Plans in Administrations and Staff Offices	90 days	10/1/08	12/31/08											
12	Continue SORs Inventory	30 days	10/1/08	10/31/08											
13	SORs Inventory Complete	0 days	11/1/08	11/1/08											
14	Review Authorities for SORs Collections	60 days	11/1/08	12/31/08											
15	Issue revised inventory to SORs collections	0 days	12/31/08	12/31/08											
16	Review of PIAs	150 days	11/1/08	3/30/09											
17	Phase 3 -- Review VA Forms	180 days	4/1/09	9/30/09											
18	Issue data call to Review VA Forms	0 days	4/1/09	4/1/09											
19	Conduct VA Forms Inventory	150 days	4/1/09	8/31/09											
20	VA Form Inventory Complete	0 days	9/1/09	9/1/09											
21	Review Authorities for Collections	30 days	9/1/09	9/30/09											
22	Issue revised inventory to VA Forms collections	0 days	9/30/09	9/30/09											
23	Phase 4 -- Review Databases	180 days	10/1/09	3/31/10											
24	Issue data call to Review VA Databases	0 days	10/1/09	10/1/09											
25	Review SMART Database	180 days	10/1/09	3/31/10											
26	Review VISTA Database	180 days	10/1/09	3/31/10											
27	Phase 5 -- Complete VA Databases Issue Final Report	180 days	7/1/09	10/31/09											
29	Implement VA Database Reduction	150 days	7/1/09	9/30/09											
30	Compile Final VA Report	30 days	9/1/10	9/30/10											
31	Submit Final VA Report	0 days	10/1/10	10/1/10											

Accomplishments and Initiatives Underway

VA is committed to reducing its collection and use of PII when feasible, and has already devoted considerable effort to do so. In June 2007, VA issued a memorandum establishing an SSN Working Group of Administration (VBA, VHA, NCA) and Staff Office representatives. They were charged with devising a plan within their respective areas to eliminate unnecessary collection and use of the SSN. This group held its first meeting in July 2007. While the primary initial focus of Administration and Staff Office efforts was the elimination of SSN use, as appropriate, going forward, these efforts will be expanded to include oversight of the VA effort to eliminate the unnecessary collection and use of all types of PII. Figure 2 below, is a listing of PII elimination initiatives that have been accomplished or are currently underway.

Figure 2: PII Elimination Accomplishments

ID	Task
1	Office of General Council PII Data Call
2	OMB data call December 2006
3	OMB Memorandum 07-16
4	Created SSN Working Group
5	Formed an Information Protection Steering Committee (IPSC) to provides recommendations for decision-making pertaining to VA's Information Protection Program.
6	Implemented an Integration Control Number (ICN) as Patient Identifier
7	Eliminated use of SSN by VA Consolidated Mail Outpatient Pharmacy (CMOP)
8	Eliminated use of SSN on VistA Mailings
9	Removed Spouse's SSN from Income Verification Match (IVM) Letters
10	Removed Veteran's SSN from the Veteran's Identification Card
11	Removed SSNs from Monthly Veteran Co-Pay Billing Statements
12	Verified Continued Need of Recurring Data Exchanges non-VA Entities
13	Modified Benefits Delivery Network (BDN) Generated Award Notification to display last four of SSN only
14	Modified BDN Generated Direct Deposit Election Letters to display last four of SSN only
15	Modified Corporate Application (CWINRS) to Display Veteran's Name and Last Four Digits of SSN
16	Modified Veteran's Insurance Claims Tracking and Response System (VICTARS) to Eliminate Printing the SSN on Designation of Beneficiary Form
17	Removed Claim Number/SSN Field From Veteran Mortgage Life Insurance (VMLI) Statements

ID	Task
18	Eliminated or Truncated Employee SSNs in Most Personnel and Accounting Integrated Data (PAID) System HR-Related Outputs
19	Removed PII from Assignment E-mails in the ExecVA System
20	Removed SSNs from All End User Security Agreements and Truncated to Last Four Digits
21	Implemented Enterprise Encryption Solution to Protect Hard Drives, Encrypt E-mails and Encrypt Removable Storage Devices
22	Completed Draft VA Directive 6507 Reducing the Use of Social Security Numbers and forwarded for Departmental coordination.
23	Initiated review of all Departmental Systems of Records (SORs) for unnecessary collection of SSN and PII
24	Issued VA Directive 6609, Mailing of Personally Identifiable and Sensitive Information, to supplement existing VA mail policy to ensure protection of PII of all individuals including veterans, dependents, and employees
25	Issued VA Directive 6371, Destruction of Temporary Paper Records to ensure PII and other sensitive agency information contained in all paper records is properly disposed of.
26	Developed and implemented procedures to ensure that all laptops have applied updated security policies and all sensitive information not authorized on the devices is removed.
27	Issued VA Directive 6601, *Removable Storage Media* mandating the use of only Federal Information Processing Standard (FIPS) 140-2 certified encrypted Universal Serial Buses (USBs) thumb drives the Department and implements a port security and device control technology to enforce adherence to the directive
28	Issued VA Handbook 6500, *Information Security Program* containing specific guidance on the use of **"Mobile/Portable/Wireless and Removable Storage Media and Device Security
29	Established levels of standardization for Blackberrys, SmartPhones and other mobile devices.
30	Initiated Remote Enterprise Security Compliance Update Environment (RESCUE) project to addresses the security of information transmitted and stored by VA remote access users.
31	Initiated procurement of a technology to encrypt transmission of passwords and information sent over the network
32	Implemented VA Public Key Infrastructure (PKI) -- an Enterprise solution to protect sensitive information contained within e-mail messages. This solution is used for all internal and external e-mail correspondence.
33	Deployed the *Rights Management Services* (RMS) as an Enterprise solution to encrypt and secure e-mails, documents and files.

I. VA's Enterprise-Wide Plan for the Elimination of the Unnecessary Use of PII

VA is comprised of three Administrations with three different missions and a consolidated OI&T that controls most IT functions. VA's Enterprise-wide plan to eliminate the unnecessary use of PII, therefore, is divided into several sub-plans based on functional areas. Each of the sub-plans will roll up into the Enterprise-wide plan to eliminate the unnecessary use of PII.

VA shares data with many Government agencies and private organizations. This is to verify income to determine benefits' eligibility, to transmit health data to third parties, to confirm a veteran's or dependent's status, to report income of employees, to verify education, etc. Because of the varying and complex nature of VA data sharing, each Administration must also coordinate with other agencies and private organizations regarding the impact of eliminating PII, and, if necessary, replacing PII with another unique identifier. VA began this effort with its participation in the Interagency Best Practices Collaborative and participation in Office of Personnel Management's task force that was chartered to create a new Unique Employee Identification Number (UEID).

The VA plan to eliminate unnecessary collection and use of PII will evolve as VA moves through the process and learns more about what data is in specific systems, and how that information is cross referenced within VA, and matched with data in other Government systems.

Between October 2007 and October 2010, VA intends to implement a plan to review and then eliminate the unnecessary use and collection of all types of PII. The Plan's well-defined tasks and milestones are designed to carry-out a complete overhaul of VA's use and collection of PII. It will provide specific procedures for all VA business owners to eliminate the collection and maintenance of any type of unnecessary PII, as appropriate.

Each of VA's functional area sub-plans will be aggregated by the Office of Privacy and Records Management (OPRM) into VA's overall plan. An overview of the plan in its current state and an overview of the plan to eliminate unnecessary collections of PII within VA's Administrations and Staff Offices as they fit into VA's overall plan is provided in paragraphs A through E below.

By the end of October 2010, OPRM will issue a final report on its findings, including discussion of the instances when the use and/or collection of PII were identified as unnecessary.

A. Phase One - Initiatives w/SSN Reduction

VA's SSN Reduction Working Group assumed responsibility as the transitional body to provide oversight during the implementation of the wider effort of Department-wide PII reduction. The Working Group concluded that the initial phase, which would take place throughout FY 2008, could most effectively be accomplished in conjunction with and as an adjunct to the Department's SSN reduction effort. The Working Group established a

preliminary set of tasks to accomplish during this first portion of the plan. These tasks reside in a living document that is subject to change as the initiative develops. The preliminary tasks identified for Phase were:

- Establish regularly scheduled meetings to oversee and facilitate this review.

- Include PII Reduction goals into regularly scheduled SSN Working Group meetings.

- Incorporate all relevant lessons learned from implementation of the Department's SSN Reduction effort into the PII Reduction Plan.

- Develop and issue policies mandating a permanent reduction in the collection of PII data throughout the agency.

- Issue data calls to all administrations and staff offices requiring review and update of all new and existing Privacy Act System of Records (SORs).
  - Complete Review of 25% of SORs

B. Phase Two - Develop Sub-Plans/Review SORs and PIAs

Phase Two of the Plan will take place during the first half of FY 2009. During this phase VA anticipates it will accomplish the following tasks:

- Establish a set of criteria, to determine whether particular uses and collections of PII can be eliminated or must be maintained.

- Draft Administration and Staff Office sub-plans.

  - Each VA Administration and Staff Office will draft its own sub-plan to comply with the mandate to eliminate the unnecessary collection, holding and use of PII.

- Develop and issue policies mandating a permanent reduction in the collection of PII data within all VA SORs throughout the agency, based on the review described in Phase One. This will include annual reviews of existing SORs to ensure that changes have not been mistakenly made to those information collections.

- Complete review of remaining 75% of SORs

- Complete review of all Privacy Impact Assessments (PIAs) conducted within the Department to ensure compliance with PII Reduction goals.

- Communicate policies and all new changes to all employees via routine employee news feeds, on-line training vehicles, and through cooperation and

coordination with the Office of IT Oversight and Compliance assessment team visits.

C. Phase Three - Review VA Forms

Phase Three of the Plan will take place during the second half of FY 2009. During this phase VA anticipates it will accomplish the following tasks:

- Issue data calls to all administrations and staff offices requiring them to review and update all new and existing VA Forms (paper and electronic).

- Develop and issue policies mandating a permanent reduction in the collection of PII data within all VA Forms throughout the agency. This will include annual reviews of new and existing VA Forms to ensure that changes have not been mistakenly made.

- Implement procedures to transition all VA Forms into compliance with the reduction plan.

D. Phase Four - Review VA Databases

Phase Four of the Plan will take place during the first half of FY 2010. During this phase VA anticipates it will accomplish the following tasks:

- Issue data calls to all administrations and staff offices requiring them to review PII Collections in SMART and VistA databases.

- Develop and issue policies mandating a permanent reduction in the collection of PII data, based on the review of SMART and VistA Databases. This will include annual reviews of new and existing VA databases to ensure that changes have not been mistakenly made.

- Communicate policies and all new changes to all employees via routine employee news feeds, on-line training vehicles, and through cooperation and coordination with Office of IT Oversight and Compliance assessment team visits.

E. Phase Five - Complete VA Databases

Phase Five of the Plan will take place during the second half of FY 2010. During this phase VA anticipates it will accomplish the following tasks:

- Implement procedures to transition all VA databases into compliance with the reduction plan.

- Issue final report by October 1, 2010.

II. Issues

One of the main challenges VA faces in eliminating of the unnecessary collection and use of PII is the need to balance resources among high priority projects. Currently, a cultural change is underway within the Department. Long-term VA employees are accustomed to using PII to authenticate veterans, as well as VA employees, contractors and volunteers. Much education and retraining will be required to break the habit of using PII as the primary way to verify identity. PII is relied upon quite heavily as positive unique identifiers at VA. There are many system changes needed before VA can implement new unique identifiers that are not based on PII. It will be a challenge to find reliable unique identifiers without eventually repeating the same challenges currently present.

III. Oversight and Monitoring

We understand that one of the keys to the success of this very complex effort will be the designation of one Office with primary oversight responsibility. To this end, the Office of Privacy and Records Management (OPRM) has been designated as the responsible office for oversight of the plan. VA Administrations and Staff Offices will be required to:

- Designate a point of contact for all business related to the plan

- Provide updates to OPRM on a regularly scheduled basis

- Provide updates to VA senior executives on the progress of their plans.

Thirdly, OPRM will compile a quarterly report on the progress of the VA plan to eliminate the unnecessary use of PII and submit it with the quarterly FISMA filing.

IV. Summary

VA has already taken a very large step forward in its efforts to evaluate its holdings of Personally Identifiable Information (PII) and to eliminate unnecessary collections. As a part of this initiative, VA has worked diligently to develop tools, monitoring capabilities, and policies and guidance to ensure the protection of all forms of PII. These steps, coupled with our future plans, will help VA maintain a culture where appropriate uses of PII are fully protected and all information about our Nation's veterans is treated with the highest level of confidentiality and the utmost respect.