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DEPARTMENT OF VETERANS AFFAIRS

Eliminating the Unnecessary Collection and Use of Social Security Numbers at the Department of Veterans Affairs

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1. OVERVIEW

This is the Department of Veterans Affairs' (VA) one-year update to its original Social Security Number (SSN) Reduction Plan, which was submitted to the Office of Management and Budget (OMB) on September 25, 2007.¹ This update highlights what progress has been made over the past ten months, and it clarifies many of the activities that must take place over the next few years to reduce the unnecessary collection and use of the SSN within VA. Many of the timeframes in the original plan have been modified because additional time is needed to develop a comprehensive inventory of VA collections and uses of the SSN.

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, social support, and lasting memorials for which they are eligible because of their service to our Nation. VA is the second largest Federal Department and employees over 260,000 individuals. As advocates for veterans and their families, VA employees are committed to providing world-class services in the provision of benefits.

VA is composed of a Central Office (VACO), located in Washington, DC, and field facilities throughout the United States, American Samoa, Guam, Puerto Rico, the Philippines, and the Virgin Islands and has 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 153 medical centers, 732 community-based outpatient clinics, 135 nursing homes, 45 residential rehabilitation treatment programs, 209 readjustment counseling centers (Vet Centers), 108 comprehensive home-care programs, 57 veterans' benefits regional offices, and 125 national cemeteries. Almost a quarter of the U.S. population is potentially eligible for VA benefits and services because they are veterans, family members, or survivors of veterans.

VA's three Administrations have three very different missions – health, benefits, and memorial affairs. The Department must be able to distinguish among veterans in order to provide the care and services to meet each veteran's unique needs. Particularly in the case of healthcare, mistaken identity could be catastrophic. Traditionally, the SSN has been the method used by VA to determine a veteran's unique identity. However, recent events over the past few years have highlighted the increased risk to veterans' identity theft because of the widespread use of the SSN.

II. Phase Zero – Project Initiation

In June, 2007, VA issued a memorandum establishing the VA SSN Work Group (SSN-WG), composed of representatives from the three Administrations and many Staff Offices. The SSN-WG meets regularly to discuss what efforts are underway and what future plans are in development to eliminate the unnecessary collection and use of the

¹ The Office of Management and Budget issued Memorandum 07-16, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information." One of the requirements was for Federal agencies to review their use of social security numbers in agency systems and programs to identify instances in which their collection and use is unnecessary. Specifically, Federal agencies were to establish a plan to eliminate the unnecessary collection and use of SSNs.

SSN. Based on general guidance from the SSN-WG, each Administration and appropriate Staff Office continues to develop its own SSN reduction plan. Upon acceptance by the SSN-WG, these individual plans will roll up into a single overall VA plan to eliminate the unnecessary collection and use of the SSN.

Major activities in VA's plan of action are illustrated in Figure 1 on the next page. Appendix A contains VA's updated version of the complete plan as of July 31, 2008. The timeframes and descriptions for most of the tasks have been clarified significantly since the original September 2007 plan.

This plan will continue to evolve as the SSN-WG establishes a more complete baseline of systems and activities that collect and use the SSN (see Phase Two for more detail). An original baseline was created in October 2007, with over 1600 line items. However, the SSN-WG realized that a more comprehensive inventory was needed. The Veterans Health Administration is taking the lead in developing a more thorough inventory, which is expected to be completed in early 2009. Once this inventory is completed, VA will be able to develop realistic priorities and detailed action plans.

III. Phase One – Accomplishments Through May 2007

VA has a tremendous store of personal information. In addition to operating over 1,500 facilities around the country, the Department interfaces with many other Federal agencies including, but not limited to, the Department of Defense (DoD), the Social Security Administration (SSA), the Internal Revenue Service (IRS), and the Department of Education (DOE). Currently, VA uses the SSN to identify employees for employment-related record keeping, and to identify veterans and their dependents in order to ensure accurate identification associated with the delivery of VA benefits and services.

Phase One consists of completed VA actions: (1) to reduce the unnecessary collection, use, and display of a veteran's SSN; (2) to reduce the unnecessary collection, use and display of employees' SSNs; and (3) to protect a veteran's SSN or an employee's SSN when collection and use is required by law or addresses a compelling business need under the mission of the Department. These initiatives, undertaken over the past several years, were completed before OMB published Memorandum 07-16 in May 2007. Examples are highlighted below. More detailed information on the other actions can be found in Appendix A.

A. Highlights of Completed Initiatives Regarding the Unnecessary Collection and Use of Veteran SSNs

- New Veteran Identification Cards no longer display the veteran's SSN. Instead, the SSN is contained within a barcode and magnetic strip.
- The veteran's SSN was removed from health care authorization cards issued for Civilian Health and Medical Program of Department of Veterans Affairs (CHAMPVA), Spina Bifida Health Care Program (SB), and Children of Women Vietnam Veterans Health Care Program.

Figure 1: Summary of SSN Plan (as of 7-31-08)

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qt
1	Phase Zero -- Project Initiation	616 days	Thu 5/24/07	Thu 10/1/09	49%		
2	Create SSN Working Group	616 days	Thu 5/24/07	Thu 10/1/09	49%	OIT Privacy and Records Mgt	
138	✓ Phase 1 -- Accomplishments through May 2007	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	
139	✓ Re Veteran SSN--Unnecessary Use	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
160	✓ Re Employee SSN-- Unnecessary Use	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	
170	✓ Increased SSN Protection When SSN Is Required	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
183	Phase Two -- Create Baseline Inventory and Prioritize Future SSN Reduction Activities	475 days	Mon 5/21/07	Fri 3/13/09	42%	OIT -- Privacy Service	
184	✓ Initial Baseline Inventory of SSN Uses	128 days	Mon 5/21/07	Wed 11/14/07	100%	OIT Privacy Service	
195	Administrations and staff offices review and validate initial baseline SSN inventory and create comprehensive inventory	326 days	Fri 12/14/07	Fri 3/13/09	26%	Administrations and Staff Offices	
196	VHA Baseline Activities	295 days	Fri 12/14/07	Thu 1/29/09	39%	VHA OI HDI	
216	Have Rest of VA Use VHA Inventory Repository	131 days	Fri 8/1/08	Fri 1/30/09	0%	OIT-Privacy Service	
228	VA-wide Inventory Complete	0 days	Fri 1/30/09	Fri 1/30/09	0%	OIT-Privacy Service	
229	Review Authorities in VA-wide Inventory to determine which are essential and/or legislatively mandated	130 days	Fri 8/1/08	Thu 1/29/09	0%	OIT Privacy Service and OGC	
234	Prioritize Future SSN Reduction Activities and Create Short and Long Range Action Plans	31 days	Fri 1/30/09	Fri 3/13/09	0%	Administrations and Staff Offices	
243	Phase Three -- Feasibility of Using New Unique Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	18%	OIT- OED	
244	New Veteran identifiers	487 days	Mon 5/21/07	Tue 3/31/09	63%	OIT- OED	
248	Coordinate with Other Agencies	540 days	Mon 5/21/07	Fri 6/12/09	12%	Various	
266	New Employee Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	26%	HRIS	
272	Phase Four -- Accomplishments Since May 2007 Through July 2008	271 days	Mon 5/21/07	Mon 6/2/08	97%	Administrations and Staff Offices	
304	Phase Five -- Short Term Actions (implementation by March 2009)	420 days	Mon 5/21/07	Fri 12/26/08	46%	Administrations and Staff Offices	
316	Phase Six -- Long Term Actions (implementation after March 2009)	1519 days	Mon 5/21/07	Thu 3/14/13	15%	Administrations and Staff Offices	
333	Phase Seven -- Briefings, Oversight and Monitoring	618 days	Mon 5/21/07	Wed 9/30/09	40%	OIT-Privacy Service	
334	Submit SSN Reduction Plan with Annual FISMA Report to OMB	392 days	Tue 4/1/08	Wed 9/30/09	50%	OIT-Privacy Service	
337	Periodic briefings to VA senior management	265 days	Mon 5/21/07	Fri 5/23/08	31%	OIT-Privacy Service	
340	Awareness/Outreach to Employees and Veterans	317 days	Mon 2/4/08	Tue 4/21/09	38%	OIT-Privacy Service	

- The veteran's SSN was removed from a variety of correspondence, such as:
 - Enrollment notification/welcome letters.
 - Income verification-related correspondence.
 - Communication mailings, including scheduling reminders and no-show correspondence to veterans generated by VistA
 - Monthly co-pay billing statements
 - Customer Contact Letters, which advise individuals of upcoming life events that may impact their enrollment in the health plan
 - Explanation of benefits forms generated for CHAMPVA, SB, and Foreign Medical Program.
- The veteran's SSN was truncated to the last four digits on a variety of correspondence, including the following:
 - Award notification letters generated from the Education Service
 - Direct deposit election letters generated from the Education Service (and only last four digits of account number are displayed)
 - Direct deposit election letters for beneficiaries receiving a subsistence allowance (Ch 31) (and only last four digits of account number is displayed)
 - All forms and letters printed from the corporate application (CWINRS) for the Vocational Rehabilitation and Employment Service
- The VA Consolidated Mail Outpatient Pharmacy eliminated the use of SSNs on prescription bottles and mailing labels.

B. Highlights of Completed Initiatives Regarding the Unnecessary Collection and Use of Employee SSNs

- Elimination or truncation of SSNs in most PAID system HR-related outputs such as forms, notices, and reports.
- Display of only the last four digits of the SSN on employee bi-weekly pay statements.

C. Completed Initiatives Regarding Increased Protection of SSNs When Collection and Use Is Required by Law or Addresses a Compelling Business Need

By law, VA must use the SSN when sharing data with certain government agencies, business partners, and private organizations. VA must verify income in order to determine benefits eligibility, to transmit health data to third party payors, to confirm veteran or dependent status, to report income of employees, to verify education, and to complete other actions too numerous to mention. Until one or more new veteran identifiers are designed and implemented (see Phase Three below), VA will need to continue to use the SSN for these purposes. Therefore, VA has increased protections on these collections and uses of the SSN. Some examples include the following:

- To minimize the use and collection of the SSN in VHA systems operations, VA assigns an Integration Control Number (ICN) as the unique identifier for each patient. This *system* identifier allows for a comprehensive view of a patient's electronic healthcare information across different VHA applications without the use of the SSN as the primary identification method. The ICN is a sequentially assigned, non-intelligent number which, in itself, does not provide any identifying information about the patient. It has been implemented as a system-to-system identifier, but it is currently not implemented across VHA to search for and select patients/beneficiaries. The ICN could be adapted as the VA identifier for use across the enterprise given its widespread implementation in VHA to 16 million beneficiaries and patients, including use as an identifying trait in the magnetic strip on all Veterans Identity Cards (VICs) issued since 2004 to approximately four million VA beneficiaries.²
- Most data transfers containing SSN information are done using encryption or secure transmission mechanisms.
- New shipping procedures ensure that any hard-copy documents containing PII are sent via carrier that offers package tracking.

IV. Phase Two – Create Baseline Inventory and Prioritize Future SSN Reduction Activities

Phase Two has four separate components: (1) develop the baseline inventory of systems, applications, processes and forms that identifies current collections and uses of the SSN; (2) review authorities to determine which SSN collections/uses are authorized; (3) work with system owners to identify SSN uses that have a compelling business need (e.g., no alternative identifier to replace the SSN as primary identifier), and (4) prioritize activities and create action plans.

A. Develop Baseline Inventory of SSN Uses

Before changing or eliminating the SSN from a particular form or system, each Administration and Staff Office within VA must evaluate the following:

- In what systems is the SSN found? What purpose is served by collecting and using the SSN?
- How is the SSN collected? Is it from a data collection form, a website, or from a third party?
- What is the legislative or regulatory mandate for collecting/using the SSN?
- If there is no legislative or regulatory mandate, what is the compelling business need for collecting/using the SSN?
- What are the system interfaces?
- What are the costs and time needed to modify these systems?
- Are there any policies or processes that must be changed?

² However, there are approximately 1.5 million active VA patients who still use the old VIC, and the old VIC does not contain the ICN in its magnetic strip. The new card is not required for treatment, and some veterans do not want to change their cards.

In October, 2007, an initial baseline inventory was created, consisting of over 1600 items. It provided sufficient information for the Administrations and the Staff Offices to determine that a more comprehensive inventory was needed. The Veterans Health Administration (VHA), established its own SSN Working Group, which is taking the lead to conduct a thorough review and assessment of a "SSN holdings" inventory for all areas and functions within VHA, scheduled to be completed in early 2009. Data collected will then be evaluated to determine business requirements for maintaining full SSN, reducing SSN display, eliminating use of the SSN, or replacing it when one or more One VA identifiers³ are available to replace the SSN as the primary identifier. The inventory will cover:

- Applications
- Programs
- Systems
- Processes
- System displays, inputs, and outputs
- Forms
- Data collection and/or storage areas
- Class III/local facility-developed software
- Vendor-produced/purchased software (Commercial-Off-the-Shelf (COTS) and Medical Devices)
- Databases and registries used throughout VHA
- External databases/systems

The VHA SSN Working Group is working closely with the SSN-WG as it finalizes the data collection tool, data sources, and data elements that will be collected. The data collection tool will be modified as needed to collect similar information on SSN holdings in the other two Administrations and the various Staff Offices. The current plan is to try and complete these inventories around the same time. Thus, a revised VA-wide inventory is scheduled to be completed in early 2009.

B. Define and Review Necessary Uses of the SSN

In August 2008, VA finalized its policy guidance regarding the unnecessary use of the SSN within the Department. VA Directive 6507, Reducing the Unnecessary Use of the SSN, states, "VA must develop and implement plans to eliminate the collection and use of the SSN as a primary identifier except where the collection or use of the SSN is required by law or addresses a compelling business need under the mission of the Department, as prescribed by the Secretary." While the SSN should not be used as the primary identifier for veterans and employees, it will still need to be collected and used for validation purposes (such as for Computer Matching) or as a backup identifier if issues arise over new primary identifier(s). A VA SSN Review Board will be established comprised of representatives from each Administration and all key Staff Offices. This board will govern the use of SSNs required by law or a compelling business need. Owners of systems with uses that are determined not to be required by law or a compelling business need will be given reasonable opportunity to develop and implement a plan to bring system uses of the SSN into compliance with VA policy.

³ Please see Section V below on new veteran identifiers for more information on One VA identifiers.

Specific guidance on how this board will operate, VA Handbook 6507.1, SSN Review Board, is currently being drafted.

After the comprehensive SSN inventory is complete, and after VA Handbook 6507.1 is finalized, the VA SSN Review Board will begin to work with the SSN-WG, the Administrations, and the Staff Offices to review existing collections and uses of the SSN. Together, they will identify the following: (1) collections/uses of the SSN required by law, with reference to the law⁴; (2) collections/uses of the SSN that have a compelling business need; and (3) unnecessary collections/uses of the SSN. Use of the SSN in data sharing activities with other entities and business partners will also be examined. The Board will also formalize processes to enable a review of all future collections and uses of the SSN during system/application design and before data collection tools (e.g., forms) are finalized.

C. Prioritize Activities and Create Action Plans

Prioritization of activities will be based on the assessment of risk, overall impact, budgeting, staffing, and availability of other resources associated with each activity. Once prioritized, they will be included in short and long-term action plans. These plans will then need to be coordinated with OMB Exhibit 300 project funding requests for FY2011 and beyond.

V. Phase Three – Feasibility of Using New Unique Identifiers

VA has begun to explore the feasibility of moving away from the SSN as the primary identifier for veterans and employees in its systems and processes.

A. New Veteran Identifiers

While VA is committed to moving away from using the SSN as the primary identifier and authenticator for veterans and beneficiaries, the SSN will continue to be collected and used as one of several identifying traits for employees and veterans (e.g., Computer Matching). VA is considering the creation of a “One VA” identifier instead of using different identifiers among the various Administrations and/or various VA systems. Ideally, VA would like to have a single, unique veteran identifier for all VA systems and programs. However, it may be necessary in the near term to develop one or more identifiers for each veteran or beneficiary, with a correlation among the identifiers maintained in a single authoritative data source. In the long term, VA is striving to develop and implement an approach for collecting the SSN and other personally identifiable information (PII) fewer times and having this information contained in a the single authoritative data source instead of the current process of collecting and maintaining this information in multiple systems.

In 2006, VA began to explore the feasibility of minimizing the use of the SSN and reducing its visibility within routine VA health care and business processes.⁵ VA found that replacing the present SSN-based identifier would be complex and that broad action

⁴ References to Executive Order 9397 alone will not be sufficient. The key provision of this order, requiring Federal agencies to use the SSN as the identifier in Federal government systems, is in the process of being rescinded.

⁵ VHA developed a white paper that recommended a single replacement identifier, and the One VA Registration and Enrollment Board also recommended a single replacement identifier.

would be necessary to accomplish this goal. The replacement of the SSN as an identifier should be approached as a One VA effort: (1) to avoid the possibility of veterans having multiple identifiers in VA systems (which could have unintended catastrophic consequences), and (2) in recognition of the pervasiveness of the SSN look-up and identification functionality in VHA systems and in data sharing initiatives with business partners including DoD. Changing to a non-SSN based identifier will stop the need for many, but not all, VA systems to capture, store, and display the SSN. Instead, the intent of the change would be to minimize the use of the SSN and to reduce its visibility within routine VA health care and business processes. Recent OMB guidance, as well as pending legislation (such as H.R. 3046, the Social Security Number Privacy and Identity Theft Prevention Act of 2007), has encouraged VA to revisit and build on earlier analysis and recommendations.

- The Enterprise Identity Management Tiger Team was chartered to develop a single, coherent, department-wide strategy regarding identity and access management for all persons of interest to VA – veterans, their dependents and families, VA employees, volunteers, contractors, business partners, and other affiliates. Final recommendations made in May 2008 included the following:
 - Create an enterprise identity management governance structure. While much of an enterprise level identity and access management solution is technology focused, the primary purpose remains to meet the business needs. A combination of business and IT leadership will best serve the enterprise level strategy.
 - Establish IT Identity and Access Management Program Management Office.
- An Identity and Access Management Program Office was created in early 2008 that will work to develop new identifiers. This year, funds were requested for FY10 to begin to design and implement a “One VA Identification System.” If funded, the VA ID System would be up and deployed with some integration of existing applications by FY13-14. It is envisioned that the One VA ID System would contain a new One VA Identifier that would be correlated to the various identifiers, including the SSN, used across all VA programs and services. After the system has been designed, and before it is fully implemented, the Administrations will need to determine when, if, and how their systems will integrate and/or use the One VA ID as a replacement in their systems. Business needs will be one of the key drivers for the new identifier, with the technology for implementation based on business requirements.
- VA must work with numerous agencies and entities to identify data exchanges and data sharing and determine where SSN is used for unique identification and where it is routinely displayed. Decisions will then need to be made on whether to continue use of the SSN or use of a replacement identifier with these business partners. These include, but may not be limited to, the following:
 - Department of Defense
 - Social Security Administration
 - Department of Treasury (including the Internal Revenue Service)
 - Department of Labor
 - Public Health Service

- Centers for Disease Control and Prevention
- Centers for Medicare and Medicaid
- Defense Finance and Accounting Service
- U.S. Coast Guard
- Office of Servicemembers' Group Life Insurance (Prudential Financial Inc)
- State Rehabilitation Agencies
- Public and Private Educational Institutions

The discussion on new veteran identifiers has begun, but it will be a long and complicated process, and implementation will not begin until 2013 at the earliest.

B. New Employee Identifiers

VA's current employee identifier is the SSN. For the past three years, VA has participated in the Multi Agency Executive Strategy Committee (MAESC) to provide feedback to OPM on how to replace the SSN with a Unique Employee Identification Number (UEID) for all Federal employees. Once OPM finishes its work, all agencies, including VA, will be required to replace their current employee identifier with the UEID. Progress at OPM regarding the development of the UEID has been slower than anticipated. Thus, VA is currently working to develop an interim employee identifier to use until the UEID is ready for deployment. The new VA employee number will be similar in structure to the UEID so that it can be replaced quickly once the UEID is ready. Implementation for the VA interim employee identifier is targeted for the end of December 2008.⁶ Meanwhile, there have been several changes made to the Personnel and Accounting Integrated Data (PAID) system to improve the protection of the SSN when it is used. For example, part of the SSN is masked when displayed and when printed.

VI. Phase Four – Accomplishments Since May 2007 through July 2008

There are numerous activities and initiatives regarding the reduction and elimination of the SSN at VA that were completed between May 2007 and July 2008. Most of these involve the removal of SSNs from correspondence and reports, improved security measures to safeguard VA records, and the revision and implementation of a comprehensive policy on the protection of personally identifiable information. A more comprehensive list of these activities can be found in Appendix A.

Examples of these accomplishments include the following:

- In September 2007, VA installed a filter at all VA electronic mail gateways that scans all outgoing e-mails and MS Office attachments (*i.e.*, MS Word, Power Point, Excel) for patterns resembling the SSN. If a pattern is recognized as an SSN, the e-mail transmission does not go through. In addition, the sender is notified that sending SSNs unencrypted violates VA policy, and directs the individual to his or her Information Security Officer or Privacy Officer for resolution.

⁶ Only employees who receive human resource services through VA's Personnel and Accounting Integrated Data (PAID) system will receive the new interim VA employee identification number. Other employees will need to wait until their human resource service provider issues UEIDs.

- VA is implementing the Remote Enterprise Security Compliance Update Environment (RESCUE). RESCUE enforces VA remote access requirements by ensuring all client computers comply with VA policy prior to remote access being granted. VA employees and contractors with compliant Government Furnished Equipment (GFE) are granted full access to authorized VA resources. Rollout should be completed by September 15, 2008. VA employees and contractors with non-VA owned Other Equipment (OE) are granted restricted access to authorized resources. The OE access is provided via a virtual desktop, which prevents users from downloading and saving VA data on OE, and also prevents local printing.
- A port security and device control that restricts information transfer to removable media, otherwise known as Sanctuary, is being implemented. Rollout is scheduled to be completed by November 2008.
- In May 2006, VA faced a potential breach of information on more than 20 million veterans when a laptop was stolen. While the laptop was successfully returned without compromising the information stored on it, VA realized it needed to restore trust and confidence in its ability to store, handle and protect veterans' personal information. In the two years since, VA has made substantial changes and improvements to its information security program. More importantly, VA has implemented significant procedures for detecting, reporting, and responding to security and privacy incidents. For example, SSN-related incidents account for approximately 28 percent of total incidents. The average number of days to resolve a privacy incident has decreased 47 percent, from approximately 38 days in October 2007 to less than 18 days in July 2008.

VII. Phase Five – Short-Term Actions (Completion by March 2009)

There are a few more activities that will be completed by March 2009. Examples include the following:

- Implementation of new employee identification numbers is targeted for December 2008.
- The SSN is exchanged with the Department of Defense (DoD) as an identity trait specifically for matching identities with DoD and is required in existing computer matching agreements and data sharing agreements under Memoranda of Understanding with DoD. However, there have been significant improvements to some of the data exchanges between the Department of Defense and VA. For example, the number of data feeds between the Defense Manpower Data Center (DMDC) and the Veterans Affairs is expected to decrease dramatically. By early autumn 2008, a single bi-directional feed between the Defense Enrollment Eligibility Reporting System (DEERS) and the Veterans Affairs/DoD Identity Repository (VADIR) will replace, where feasible, 31 feeds sent from DoD to VA as well as 11 feeds sent from VA to DoD. Having a single bi-directional feed between these two systems will reduce the creation of duplicative data sets that typically include SSN.

- By December 2008, VA will complete the first phase of the e-benefits portal through which veterans can establish a user ID and password to access their VA information. Having this portal will reduce the number of times a veteran must provide his/her SSN to VA.

VIII. Phase Six – Long-Term Actions (Implementation after March 2009)

With general guidance from the SSN-WG, each Administration and Staff Office is responsible for its methodology for developing medium-term and long-term compliance with OMB's mandate to eliminate the unnecessary collection and use of the SSN. Since the comprehensive inventory of VA SSN collections and uses will not be ready until early 2009, and the action plans will not be finalized until March 2009, complete implementation of most SSN reduction activities will not be completed until well after March 2009. These activities include the implementation of the UEID for employees, removal of SSNs from as many data collection forms and websites as feasible (with the goal of collecting once and using many times) and approval and implementation of alternative One VA identifiers to replace the SSN as the primary identifier.

IX. Phase Seven – Briefings, Oversight, and Monitoring

The key to the success of any effort is to monitor and report progress to an oversight body. VA's Office of Privacy and Records Management (OPRM) has been designated as the responsible office for oversight of the VA plan and is the lead office on the SSN-WG. OPRM in turn, reports up to the VA Chief Information Officer, who is the Senior Agency Official for Privacy. The Administrations and Staff Offices provide updates to OPRM, and OPRM is responsible for providing updates to VA senior executives on the progress of the plan. OPRM is also responsible for answering the privacy questions in VA's quarterly and annual FISMA reports.

A new section has been added to Phase Seven of this plan. VA developed an SSN Awareness campaign that kicked off on March 25, 2008. The goals of this campaign are threefold: (1) to reach the more than 260,000 VA employees and let them know about the SSN reduction initiative; (2) to raise the awareness of the importance of protecting personally identifiable information used in the course of official duties, and (3) to let veterans know that VA is committed to protecting their personal information, including their SSN. A key component of this awareness campaign is to provide the public information on VA's SSN Reduction Plan via the Internet at www.privacy.va.gov.

X. Issues

There are several major challenges facing VA regarding the elimination of the unnecessary collection and use of the SSN.

- The first is the need to balance resources among high priority projects. The SSN is relied upon as the primary unique identifier at VA. There are many system changes needed before VA can implement new unique identifiers that will replace the SSN as the primary identifier. For example, VBA is currently

migrating from its legacy system to a corporate application, the Veterans Service Network or VETSNET. Migration to VETSNET will be completed by June 2009. This should improve VBA's ability to process disability compensation and pension claims. However, in order to meet the migration deadline, changes to VETSNET, including changes regarding the use of the SSN, must be deferred until the migration is complete.

- Second, it will be a challenge to find a single reliable unique identifier that will not, over time, cause the same challenges as are currently present with the SSN.
- Third, a culture change among employees is required. Long time VA employees are accustomed to using the SSN to authenticate veterans, as well as VA employees, contractors, and volunteers. VA will need to implement education and retraining programs for employees to break the habit of using the SSN as the primary way to verify identity.
- Culture change is necessary for veterans as well. For example, while new VIC cards have been available since 2004, approximately 1.5 million active VA patients continue to use the old card. This causes two problems: (1) the old card displays the veteran's SSN, which could lead to identity theft if lost or stolen; and (2) the magnetic strip on the old cards does not contain the Integrated Control Number. Thus, the patient's information would need to be manually entered each time the veteran visits a VA medical facility, instead of being read electronically from the card if the ICN is used as the primary identifier for all systems that are integrated with the VIC card.

XI. Summary

VA has taken many steps to eliminate the use of SSNs where they are not mission-critical. However, there are instances where the collection and use of the SSN are, and will continue to be, required by regulation or legislation, or to address a compelling business need under the mission of the Department. In these instances protection of the SSN, and all personally identifiable information, is critical. As a part of its effort to protect the SSN, VA has been working diligently to develop tools, monitoring capabilities, a governance structure, and policies and guidance to ensure the protection of the SSN. These steps will help to maintain a culture where appropriate uses of the SSN are balanced with data quality and the need for confidential, realistic, and flexible approaches that enhance privacy and security for veterans and our employees.

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
1	Phase Zero -- Project Initiation	616 days	Thu 5/24/07	Thu 10/1/09	49%		
2	Create SSN Working Group	616 days	Thu 5/24/07	Thu 10/1/09	49%	OIT Privacy and Records Mgt	
3	Draft memo	0 days	Mon 7/9/07	Mon 7/9/07	100%	OIT Privacy and Records Mgt	
4	Select members	0 days	Mon 7/16/07	Mon 7/16/07	100%	Administrations and Staff Offices	
5	Kickoff meeting	0 days	Tue 9/18/07	Tue 9/18/07	100%	OIT Privacy and Records Mgt	
6	Review initial plan	0 days	Tue 9/18/07	Tue 9/18/07	100%	Administrations and Staff Offices	
7	Approve initial plan for FY 2007 Annual FISMA Report	0 days	Tue 9/18/07	Tue 9/18/07	100%	Administrations and Staff Offices	
8	Conduct weekly meetings	616 days	Thu 5/24/07	Thu 10/1/09	47%	OIT Privacy and Records Mgt	
133	Review and Approve Future Plans	523 days	Mon 10/1/07	Wed 9/30/09	50%	Administrations and Staff Offices	
134	April 2008 review	131 days	Mon 10/1/07	Mon 3/31/08	100%	OIT Privacy and Records Mgt	
135	FY 2008 FISMA Report (September 2008)	131 days	Tue 4/1/08	Tue 9/30/08	100%	SSN Working Group	
136	March 2009 review	131 days	Wed 10/1/08	Wed 4/1/09	0%	OIT Privacy and Records Mgt	
137	FY 2009 FISMA Report (September 2009)	131 days	Wed 4/1/09	Wed 9/30/09	0%	SSN Working Group	
138	Phase 1 -- Accomplishments through May 2007	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	
139	Re Veteran SSN--Unnecessary Use	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
140	New VIC cards no longer display SSN	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
141	SSN Removed from enrollment notification/welcome letters	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
142	SSN no longer on income verification-related correspondence	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
143	Consolidated Mail Outpatient Pharmacy (CMOP) eliminated SSN on prescription bottles and mailing labels	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
144	SSN removed from VHA Volunteer database	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
145	VistA no longer prints SSN on communication mailings	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
146	SSN removed from all monthly co-payment billing statements	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
147	SSN removed from VA Form 10-7078 (Civil Hospital and Community Nursing Care) and VA Form 10-7079 (Authorization for short term and Home Health)	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
148	SSN is masked on explanation of benefits (EOB) for Civilian Health and Medical Program of VA (CHAMPVA), Spina Bifida Health Care Program (SB), and Foreign Medical Program (FMP)	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
149	SSN removed from health care authorization cars for CHAMPVA, SB, and Children of Women Vietnam Veterans Health Care Program (CWVV)	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
150	SSN removed from Customer Contact Letters	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
151	VHA scrambled or truncated SSN when needed for verification; SSN hidden during use	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
152	Updated and strengthened procedures for handling changes to address and direct deposit information	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
153	Only last 4 of SSN on Benefits Deliver Network (BDN) generated direct deposit election letters from Education Service; bank routing number removed, and only last for of account number displayed	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
154	Only last 4 of SSN on BDN generated aware notification letters from Education Service	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
155	The corporate application (CWINRS) for Vocational Rehabilitation and Employment (VR&E) only displays name and last 4 of SSN on all printed documents	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
156	Only last 4 of SSN on BDN generated direct deposit election letters for beneficiaries receiving subsistence allowance; bank routing number removed and only last 4 of account number displayed	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
157	VR&E Service limits contractor access to Counseling -Evaluation-Rehabilitation (CER) folders	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
158	Veterans Insurance Claims Tracking and Response System (VICTARS) modified so SSN removed from Designation of Beneficiary Form	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
159	AI PII stripped from assignment emails on the ExecVA system	0 days	Mon 5/21/07	Mon 5/21/07	100%	Office of Secretary	
160	Re Employee SSN-- Unnecessary Use	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	
161	SSN's have been eliminated or truncated in most Personnel and Accounting Integrated Data (PAID) system human resources (HR) related outputs	0 days	Mon 5/21/07	Mon 5/21/07	100%	OHRM	
162	SSN no longer appears on all routine email correspondence from Office of Human Resources Management (OHRM)	0 days	Mon 5/21/07	Mon 5/21/07	100%	OHRM	
163	HR data must be encrypted before sent in electronic form	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
164	SSN truncated to last 4 digits on all bi-weekly pay statements	0 days	Mon 5/21/07	Mon 5/21/07	100%	OHRM	
165	Time and Attendance (T&A) displays to employee to show last 4 of SSN	0 days	Mon 5/21/07	Mon 5/21/07	100%	HRIS	
166	Change from full SSN to last 4 digits on HR PAID output (except for SF 50's where the full SSN is required)	0 days	Mon 6/11/07	Mon 6/11/07	100%	HRIS	
167	SSN scrambled or reduced to last 4 digits when used within VHA research, administrative planning, and HR	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
168	SSN removed from all NCA job related correspondence	0 days	Mon 5/21/07	Mon 5/21/07	100%	NCA	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
169	SSN is not used on any ID badges/materials	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
170	Increased SSN Protection When SSN is Required	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
171	ICN used as identifier in VHA systems	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
172	Encryption and dedicated transmissions for DoD-VA interface	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
173	Completed review of 831 recurring VBA data exchanges with non-VBA entities that have PII	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
174	Standardized Work at Home/FlexiPlace procedures for VBA employees to ensure protection of PII	0 days	Mon 5/21/07	Mon 5/21/07	100%	VBA	
175	New procedures for shipment of documents with PII must be via carrier with package tracking	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
176	Eliminated use of unencrypted thumb drives across the Department	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
177	Truncation of SSN on mail-in supply reorder cards	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
178	Installation of filter on all gateways to scan for emails containing SSN -- external emails with SSN must be encrypted to be transmitted	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
179	Elimination of SSN from VHA audiogram-related application	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
180	OIG issued comprehensive end user policy on protection of PII	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIG	
181	OIG implemented an enterprise encryption solution across OIG	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIG	
182	OIG has put into place processes to de-identify large data sets to maximum extent possible	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIG	
183	Phase Two -- Create Baseline Inventory and Prioritize Future SSN Reduction Activities	475 days	Mon 5/21/07	Fri 3/13/09	42%	OIT -- Privacy Service	
184	Initial Baseline Inventory of SSN Uses	128 days	Mon 5/21/07	Wed 11/14/07	100%	OIT Privacy Service	
185	Review Office of General Counsel data call April 2006	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
186	Review Office of Management and Budget (OMB) data call December 2006	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
187	Review Privacy Impact Assessments (PIAs)	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
188	Review of OMB authorized forms	60 days	Mon 7/30/07	Fri 10/19/07	100%	OIT Privacy Service	
189	Review of Security Management and Reporting Tool (SMART) inventory of VA systems containing PII	60 days	Mon 7/30/07	Fri 10/19/07	100%	OIT Privacy Service	
190	Review of Enterprise Architecture's Baseline inventory	10 days	Mon 9/17/07	Fri 9/28/07	100%	OIT Privacy Service	
191	Review of VistA uses of SSN (prepared in 2006)	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
192	Review compilation of VBA computer systems and applications using the SSN	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
193	Initial Inventory Complete	0 days	Thu 11/1/07	Thu 11/1/07	100%	OIT Privacy Service	
194	Initial review of authorities identified in baseline inventory	128 days	Mon 5/21/07	Wed 11/14/07	100%	OIT Privacy Service	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
195	Administrations and staff offices review and validate initial baseline SSN inventory and create comprehensive inventory	326 days	Fri 12/14/07	Fri 3/13/09	26%	Administrations and Staff Offices	
196	VHA Baseline Activities	295 days	Fri 12/14/07	Thu 1/29/09	39%	VHA OI HDI	
197	✓ Create VHA SSN Working Group (includes adequate representation to provide the business need for the SSN)	0 days	Fri 12/14/07	Fri 12/14/07	100%	VHA OI HDI	
198	✓ Finalize VHA SSN Working Group Charter	55 days	Fri 12/14/07	Thu 2/28/08	100%	VHA OI HDI	
199	Develop Processes for Evaluating New/Changes to SSN	206 days	Fri 2/29/08	Sun 12/14/08	15%	VHA SSN Working Group	
200	VHA Baseline Inventory by Category	250 days	Fri 1/4/08	Thu 12/18/08	42%	VHA SSN Inventory Subgroup	
201	✓ Develop Categories	41 days	Fri 1/4/08	Fri 2/29/08	100%	VHA SSN Inventory Subgroup	
202	✓ Identify Sources	120 days	Fri 1/4/08	Thu 6/19/08	100%	VHA SSN Inventory Subgroup	
203	✓ Identify Business Owners	120 days	Fri 1/4/08	Thu 6/19/08	100%	VHA SSN Inventory Subgroup	
204	✓ Review VA Baseline Inventory Efforts from Other Sources	30 days	Fri 6/20/08	Thu 7/31/08	100%	VHA SSN Inventory Subgroup	
205	Stand Up Dabase for Inventory Collection	216 days	Fri 1/4/08	Fri 10/31/08	33%	VHA SSN Inventory Subgroup	
206	Develop Collection Tool	216 days	Fri 1/4/08	Fri 10/31/08	33%	VHA SSN Inventory Subgroup	
207	Obtain VHA Approval for Data Collection Effort Across VHA	176 days	Fri 2/29/08	Fri 10/31/08	18%	VHA SSN Inventory Subgroup	
208	Develop Guidance for Data Collection	96 days	Fri 6/20/08	Fri 10/31/08	0%	VHA SSN Inventory Subgroup	
209	Gather VHA Metadata	35 days	Fri 10/31/08	Thu 12/18/08	0%	VHA Business Owner	
210	Identify Authority for Use	35 days	Fri 10/31/08	Thu 12/18/08	0%	VHA Business Owner	
211	Identify Business Need to Retain Full SSN	35 days	Fri 10/31/08	Thu 12/18/08	0%	VHA Business Owner	
212	Identify Unnecessary Use	35 days	Fri 10/31/08	Thu 12/18/08	0%	VHA Business Owner	
213	Identify Data Sharing with Other Entities/Business	35 days	Fri 10/31/08	Thu 12/18/08	0%	VHA Business Owner	
214	Analyze New VHA Baseline Inventory	30 days	Fri 12/19/08	Thu 1/29/09	0%	VHA SSN Working Group and VHA SSN Inventory Subgroup	
215	VHA Inventory Complete	0 days	Thu 1/29/09	Thu 1/29/09	0%	VHA SSN Working Group	
216	Have Rest of VA Use VHA Inventory Repository	131 days	Fri 8/1/08	Fri 1/30/09	0%	OIT-Privacy Service	
217	Review VHA Categories and Modify if Necessary	56 days	Fri 8/15/08	Fri 10/31/08	0%	Other Administrations and Staff Offices	
218	Review Data Collection Tool and Modify if Necessary	56 days	Fri 8/15/08	Fri 10/31/08	0%	Other Administrations and Staff Offices	
219	Obtain Approval for Data Collection Across VBA, NCA, and Staff Offices	56 days	Fri 8/15/08	Fri 10/31/08	0%	OIT-Privacy Service	
220	Review Guidance for Data Collection and Modify if Necessary	66 days	Fri 8/1/08	Fri 10/31/08	0%	OIT-Privacy Service	
221	Gather Metadata from VBA, NCA, and Staff Offices	35 days	Mon 11/3/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
222	Identify Authority for Use	35 days	Mon 11/3/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
223	Identify Business Need to Retain Full SSN	35 days	Mon 11/3/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
224	Identify Unnecessary Use	35 days	Mon 11/3/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
225	Identify Data Sharing with Other Entities/Business Partners	35 days	Mon 11/3/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
226	Analyze new VBA, NCA, and Staff Office Baseline Inventory	30 days	Mon 12/22/08	Fri 1/30/09	0%	Administration and Staff Office Business Owners	
227	Non-VHA inventory Complete	0 days	Fri 1/30/09	Fri 1/30/09	0%	OIT-Privacy Service	
228	VA-wide Inventory Complete	0 days	Fri 1/30/09	Fri 1/30/09	0%	OIT-Privacy Service	
229	Review Authorities in VA-wide Inventory to determine which are essential and/or legislatively mandated	130 days	Fri 8/1/08	Thu 1/29/09	0%	OIT Privacy Service and OGC	
230	Develop separate group to review authorities and make determinations on whether SSN can continue to be used when use is not mandated/authorized	130 days	Fri 8/1/08	Thu 1/29/09	0%	OIT Privacy Service and OGC	
231	Clarify and publish acceptable list of SSN uses	100 days	Fri 8/1/08	Thu 12/18/08	0%	OIT Privacy Service and OGC	
232	Establish acceptable SSN use group	30 days	Fri 12/19/08	Thu 1/29/09	0%	OIT Privacy Service	
233	Identify senior level group to address appeals regarding acceptable SSN use decisions	30 days	Fri 12/19/08	Thu 1/29/09	0%	Administrations and Staff Offices	
234	Prioritize Future SSN Reduction Activities and Create Short and Long Range Action Plans	31 days	Fri 1/30/09	Fri 3/13/09	0%	Administrations and Staff Offices	
235	Prioritize Future SSN Reduction Activities Based on Review of Completed VA-wide Inventory	30 days	Mon 2/2/09	Fri 3/13/09	0%	Administrations and Staff Offices	
236	VHA to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	VHA SSN Working Group	
237	VBA to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	VBA	
238	NCA and Staff Offices to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	NCA and Staff Offices	
239	Create Short and Long Range Action Plans	31 days	Fri 1/30/09	Fri 3/13/09	0%	Administrations and Staff Offices	
240	VHA creates plans	30 days	Fri 1/30/09	Thu 3/12/09	0%	VHA SSN Working Group	
241	VBA creates plans	1 day	Mon 2/2/09	Mon 2/2/09	0%	VBA	
242	NCA and Staff Offices create plans	30 days	Mon 2/2/09	Fri 3/13/09	0%	NCA and Staff Offices	
243	Phase Three -- Feasibility of Using New Unique Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	18%	OIT- OED	
244	New Veteran identifiers	487 days	Mon 5/21/07	Tue 3/31/09	63%	OIT- OED	
245	Initial exploration completed 2006	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
246	Identity Management Tiger Team Develops Report	245 days	Mon 5/21/07	Fri 4/25/08	100%	OIT-OED	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
247	Identity Management and Access Management Program Office works to develop new identifiers	289 days	Thu 2/21/08	Tue 3/31/09	32%	OIT-OED	
248	Coordinate with Other Agencies	540 days	Mon 5/21/07	Fri 6/12/09	12%	Various	
249	All exchanges of veteran and employee data (including SSNs) and data sharing with other agencies and entities must be identified and analyzed to determine if they are authorized/necessary or if they can be replaced	480 days	Mon 5/21/07	Fri 3/20/09	0%	Various	
250	Department of Defense	480 days	Mon 5/21/07	Fri 3/20/09	0%	OED,VBA and others	
251	Social Security Administration	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
252	Department of the Treasury	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
253	Department of Labor	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
254	Public Health Service	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
255	Centers for Disease Control and Prev	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
256	Centers for Medicaid and Medicare	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
257	Defense Finance and Accounting Service	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
258	U.S. Coast Guard	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
259	Office of Servicemembers Group Life Insurance	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
260	State Rehabilitation Agencies	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
261	Public and Privacy Educational Institutions	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
262	Incorporate findings from coordination with other agencies into action plans	60 days	Mon 3/23/09	Fri 6/12/09	0%	Administrations and Staff Offices	
263	Review E-Government Initiatives	218 days	Mon 3/3/08	Wed 12/31/08	43%	OIT	
264	Participate on Interagency Best Practices Collaborative	502 days	Thu 6/14/07	Fri 5/15/09	100%	OIT Privacy and Records Mgt	
265	Participate in High Volume PII Subcommittee of Interagency Best Practices Collaborative	400 days	Wed 9/12/07	Tue 3/24/09	56%	OIT Privacy and Records Mgt	
266	New Employee Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	26%	HRIS	
267	Participate on Office of Personnel Management (OPM) task force to create a Federal unique employee identification number (UEID)	1200 days	Mon 7/3/06	Fri 2/4/11	39%	HRIS	
268	OPM issued First Concept of Operations for UEID	0 days	Wed 1/9/08	Wed 1/9/08	100%	OPM	
269	OPM issues final guidance on UEID	800 days	Wed 1/9/08	Tue 2/1/11	0%	OPM	
270	VA develops interim employee identifier while waiting for final guidance on OPM's UEID	153 days	Mon 6/2/08	Wed 12/31/08	54%	HRIS	
271	VA implements interim employee identifier	0 days	Thu 1/1/09	Thu 1/1/09	0%	HRIS	
272	Phase Four -- Accomplishments Since May 2007 Through July 2008	271 days	Mon 5/21/07	Mon 6/2/08	97%	Administrations and Staff Offices	
273	Comprehensive policy on protection of PII	251 days	Mon 5/21/07	Mon 5/5/08	100%	OIT Privacy Service	
274	Update VA Directive 6502, Enterprise Privacy Program	251 days	Mon 5/21/07	Mon 5/5/08	100%	OIT Privacy Service	
275	Create VA Directive 6371, Destruction of Temporary Paper Records	250 days	Mon 5/21/07	Fri 5/2/08	100%	OIT Records Management Service	
276	Create VA Directive 6609, Mailing of Personally Identifiable and Sensitive Information	125 days	Mon 5/21/07	Fri 11/9/07	100%	OIT Records Management Service	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
277	Develop draft internal OIG policy to virtually eliminate use of SSNs in larger data sets used in OIG oversight work	160 days	Mon 5/21/07	Fri 12/28/07	100%	OIG	
278	Review forms and websites collecting/using SSNs (data call completed Summer 2007)	96 days	Mon 5/21/07	Mon 10/1/07	100%	Administrations and Staff Offices	
279	Review all system of records notices (SORNs) to identify all systems that use SSN	131 days	Mon 5/21/07	Mon 12/31/07	100%	Administrations and Staff Offices	
280	Review of printed forms for necessity of full or truncated SSN (DALC/ROES)	200 days	Mon 5/21/07	Fri 2/22/08	100%	OED	
281	Truncate the SSN on Education Service PC Generate Letters to last four of SSN	125 days	Mon 5/21/07	Sat 11/10/07	100%	VBA	
282	Remove the SSN from the Insurance Service's Inforce RPO document	225 days	Mon 5/21/07	Fri 3/28/08	100%	VBA	
283	Research requirements for SSN to be retained in any solicitation or contractual documents with the intent to eliminate use of SSN in procurement documents (Electronic Commerce Business Solutions Office -- ECBSO)	118 days	Mon 5/21/07	Wed 10/31/07	100%	OED	
284	Discussions with VA procurement policy staff regarding acquisition regulations that reference SSN (ECBSO)	140 days	Mon 5/21/07	Fri 11/30/07	100%	OED	
285	Issue guidance to the VA acquisition community on the elimination of the use of the SSN in procurement documents through an update to the eCMS Information Letter (ECBSO). Guidance issued by VHA CLO office on 12/13/07.	161 days	Mon 5/21/07	Mon 12/31/07	100%	OED	
286	Implementation of enterprise encryption solution across VA that encrypts hard drives, email messages, and removable storage devices across VA	225 days	Mon 5/21/07	Fri 3/28/08	100%	OIT	
287	Replace use of truncated SSN (last four) in username for VA's Learning Management System (LMS)	96 days	Mon 5/21/07	Mon 10/1/07	100%	OED	
288	SSN truncated to last 4 digits on all mail-in supply reorder cards (Denver Acquisition and Logistics Center/Remote Order Reentry System - DALC/ROES)	74 days	Mon 5/21/07	Thu 8/30/07	100%	OED	
289	Review of physical storage of printed end user Security Agreements (DALC/ROES)	41 days	Mon 11/5/07	Mon 12/31/07	100%	OED	
290	Truncation of SSN on end user Security Agreements (DALC/ROES)	74 days	Mon 5/21/07	Thu 8/30/07	100%	OED	
291	Review of storage instances of full SSN in database files (DALC/ROES)	200 days	Mon 5/21/07	Fri 2/22/08	100%	OED	
292	Access to DAL/ROES records controlled by access assignments made on need to know basis	40 days	Mon 5/21/07	Fri 7/13/07	100%	OED	
293	Strong passwords are required for access to systems/applications (DALC/ROES)	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
294	Truncation of SSN on hard copy reports and forms printed from ROES and DALC production system	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
295	Hashing of SSN in transmission between VA medical centers (VAMC) and DALC	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
296	Hashing of SSN in transmission between E-authentication infrastructure and the DALC	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
297	SSN truncated to last 4 on Electronic Data Interchange (EDI) transactions (DALC/ROES)	74 days	Mon 5/21/07	Thu 8/30/07	100%	OED	

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Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
298	Servers and media containing individual records are located in a secure location (DALC/ROES)	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
299	Portable electronic storage media are encrypted (DALC/ROES)	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
300	Review of occurrences of SSN in letters mailed to individual veterans (DALC/ROES)	75 days	Mon 5/21/07	Fri 8/31/07	100%	OED	
301	Review of SSN usage in interfaces with other VA systems (DALC/ROES)	82 days	Tue 1/8/08	Wed 4/30/08	75%	OED	
302	Review of SSN display in ROES and internal DALC applications	82 days	Tue 1/8/08	Wed 4/30/08	75%	OED	
303	Review of contracts with commercial vendors/business associates for compliance with overall plan to eliminate unnecessary use of SSNs (DALC/ROES)	131 days	Mon 12/3/07	Mon 6/2/08	60%	OED	
304	Phase Five -- Short Term Actions (implementation by March 2009)	420 days	Mon 5/21/07	Fri 12/26/08	46%	Administrations and Staff Offices	
305	Create VA Directive 6507, Use of SSN Numbers	336 days	Mon 5/21/07	Mon 9/1/08	100%	OIT Privacy Service	
306	Seek an agency deviation to Federal Acquisition Regulations for VA to eliminate use of the SSN from any clauses included in VA procurement documents (ECBSO)	250 days	Wed 10/31/07	Tue 10/14/08	40%	OED	
307	Identify all uses of SSN in VistA (including inputs and outputs)	196 days	Fri 2/1/08	Fri 10/31/08	63%	VHA SSN Working Group	
308	Convert all paper Official Personnel Folders (OPFs) to Electronic OPFs (eOPFs)	305 days	Wed 8/1/07	Tue 9/30/08	82%	HRIS	
309	Final internal OIG policy to virtually eliminate use of SSNs in larger data sets used for OIG oversight	200 days	Mon 12/31/07	Fri 10/3/08	75%	OIG	
310	Assessment of whether all data transmissions are meeting VA security requirements	270 days	Mon 10/1/07	Fri 10/10/08	0%	OIT R&E	
311	Remove partial SSN from user identification number for E-travel system	215 days	Mon 3/3/08	Fri 12/26/08	49%	Financial Services Center	
312	All printed forms will be reviewed to determine necessity of full or truncated SSN	270 days	Mon 10/1/07	Fri 10/10/08	30%	OIT-Privacy Service	
313	Identify and review all VHA databases and registries (with inputs and outputs)	300 days	Mon 5/21/07	Fri 10/3/08	50%	VHA SSN Working Group and VHA SSN Inventory Subgroup	
314	VBA assessment on feasibility of using a new identifier	360 days	Mon 5/21/07	Fri 10/3/08	0%	VBA	
315	Update all SORNS	197 days	Tue 1/1/08	Wed 10/1/08	25%	Administrations and Staff Offices	
316	Phase Six -- Long Term Actions (implementation after March 2009)	1519 days	Mon 5/21/07	Thu 3/14/13	15%	Administrations and Staff Offices	
317	Create VA Handbook 6507.1, VA SSN Review Board	153 days	Mon 6/2/08	Wed 12/31/08	54%	OIT Privacy Service	
318	Ensure that a single entity review and approve all proposed uses of the SSN in new systems and modifications to existing systems	43 days	Fri 1/30/09	Tue 3/31/09	0%	OIT Privacy Service	
319	Clarify and confirm this entity	30 days	Fri 1/30/09	Thu 3/12/09	0%	OIT Privacy Service	
320	Entity begins to meet	0 days	Tue 3/31/09	Tue 3/31/09	0%	OIT Privacy Service	
321	Substitute for paper SF-50	512 days	Mon 10/1/07	Tue 9/15/09	49%	HRIS	
322	OPM issues final guidance on UEID	800 days	Wed 1/9/08	Tue 2/1/11	0%	OPM	
323	OPM UEID ready for roll out	0 days	Tue 2/1/11	Tue 2/1/11	0%	OPM	

Project: Appendix A -- Detailed SSN Reduction Plan (as of 7/31/08)
Date: Fri 9/19/08

Task		Project Summary	
Split		External Tasks	
Progress		External MileTask	
Milestone		Split	
Summary			

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Qtr 2
324	VA implements OPM UEID employee identifier	175 days	Wed 2/2/11	Tue 10/4/11	0%	HRIS	
325	Based on VA-wide inventory, work to remove SSN from data collection forms and websites	180 days	Mon 2/2/09	Fri 10/9/09	0%	Records Management Service	
326	VBA completes migration from BDN to VetsNet, the new VBA corporate database (no changes to VetsNet, including any changes regarding SSN use, will be allowed until migration is complete)	552 days	Mon 5/21/07	Tue 6/30/09	50%	VBA	
327	Work with Administrations and Staff Offices to approve new identifiers to replace SSN (based on results from new identifier feasibility tasks)	260 days	Wed 4/1/09	Tue 3/30/10	0%	OED	
328	Implement new identifiers	769 days	Mon 4/5/10	Thu 3/14/13	0%	System Owners	
329	Replace PAID with new human resources information system	900 days	Wed 4/1/09	Tue 9/11/12	0%	HRIS	
330	Work with OMB's Office of Federal Procurement Policy to have FAR updated to eliminate use of the SSN, unless required for reasons of national security (ECBSO) (dependent on results from discussions with VA Procurement Policy Staff)	500 days	Mon 5/21/07	Fri 4/17/09	16%	OED	
331	Get all VA staff associated with information collection to become users of ExecVa -- which will simplify the process and create a closed system	360 days	Mon 3/3/08	Fri 7/17/09	23%	OED	
332	Encrypted SSN or move to new identifier for SSN's imbedded in barcodes or magnetic stripes	576 days	Fri 2/1/08	Thu 5/27/10	14%	VHA SSN Working Group and VHA SSN Inventory Subgroup	
333	Phase Seven -- Briefings, Oversight and Monitoring	618 days	Mon 5/21/07	Wed 9/30/09	40%	OIT-Privacy Service	
334	Submit SSN Reduction Plan with Annual FISMA Report to OMB	392 days	Tue 4/1/08	Wed 9/30/09	50%	OIT-Privacy Service	
335	FY 2008 FISMA Report (September 2008)	131 days	Tue 4/1/08	Tue 9/30/08	100%	SSN Working Group	
336	FY 2009 FISMA Report (September 2009)	131 days	Wed 4/1/09	Wed 9/30/09	0%	SSN Working Group	
337	Periodic briefings to VA senior management	265 days	Mon 5/21/07	Fri 5/23/08	31%	OIT-Privacy Service	
338	Briefing materials prepared for Secretary	0 days	Mon 2/11/08	Mon 2/11/08	100%	OIT-Privacy Service	
339	Future briefings	265 days	Mon 5/21/07	Fri 5/23/08	31%	OIT-Privacy Service	
340	Awareness/Outreach to Employees and Veterans	317 days	Mon 2/4/08	Tue 4/21/09	38%	OIT-Privacy Service	
341	Creation of SSN Reduction Awareness Page on Privacy Service Intranet and Internet webpages	35 days	Mon 2/4/08	Fri 3/21/08	100%	OIT-Privacy Service	
342	Placement of SSN Plan on Privacy Service webpages	0 days	Mon 2/11/08	Mon 2/11/08	100%	OIT-Privacy Service	
343	SSN Reduction Awareness Campaign Kick off	1 day	Tue 3/25/08	Tue 3/25/08	100%	OIT-Privacy Service	
344	Future SSN Reduction Awareness Efforts	280 days	Wed 3/26/08	Tue 4/21/09	30%	OIT-Privacy Service	

Project: Appendix A -- Detailed SSN Reduction Plan (as of 7/31/08)
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Task		Project Summary	
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