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

September 2007

OVERVIEW

The Department of Veterans Affairs (VA) is pleased to provide the Office of Management and Budget (OMB) this first report on VA's efforts to eliminate the unnecessary collection and use of the Social Security Number (SSN). VA is committed to reducing the unnecessary collection and use of the SSN wherever feasible, and is devoting considerable resources to do so. In fact, 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."

VA's mission is to serve America's veterans and their families with dignity and compassion and to be their principal advocate to ensure that they receive medical care, benefits, social support, and lasting memorials promoting the health, welfare, and dignity of all veterans in recognition of their service to this Nation. It is the second largest Federal Department, with over 235,000 employees. Among the many professions represented in the vast VA workforce are physicians, nurses, counselors, statisticians, architects, computer specialists, and attorneys. As advocates for veterans and their families, the VA community is committed to providing the very best services with an attitude of caring and respect.

VA is composed of a Central Office (VACO), located in Washington, DC, and field facilities throughout the United States administered by its three major line organizations: the Veterans Health Administration (VHA), the Veterans Benefits Administration (VBA), and the National Cemetery Administration (NCA). Services and benefits are provided 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. The current population of potential VA customers is almost 24 million veterans.

EFFORTS CURRENTLY UNDERWAY AT VA

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. A case of mistaken identity could be catastrophic. Traditionally, the SSN has been used to determine an individual's unique identity. Recent events over the past year, however, have highlighted the increased risk to veterans' identity theft because of the widespread use of the SSN.

Soon after receiving OMB Memorandum 07-16, VA's Chief Information Officer sent a memorandum to all Administrations and Staff Offices requesting representatives to participate in the VA SSN Work Group (SSN-WG) to address the issue of eliminating the unnecessary collection and use of the SSN throughout the Department. The Office of Privacy and Records Management heads the group, which currently includes members from the following:

- Office of the Secretary
- National Cemetery Administration
- Office of Human Resources Management

- Office of Information Technology
- Office of Inspector General
- Office of Public and Intergovernmental Affairs
- Office of Operations, Security, and Preparedness
- Office of Policy and Planning
- Veterans Benefits Administration
- Veterans Health Administration

Representatives are responsible for leading the development of a plan to eliminate the unnecessary collection and use of the SSN across the Department. The SSN-WG held its first meeting on July 25, 2007. During subsequent weekly meetings, the Group assembled information on efforts that have been made to reduce the use of the SSN; what efforts are currently underway; and what future plans are in development to eliminate the unnecessary collection and use of the SSN.
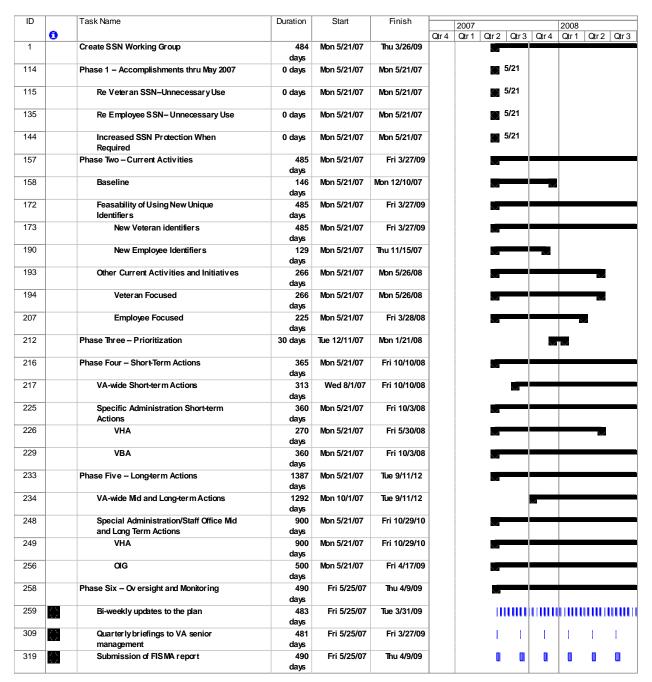
I. VA's Department-wide Plan

Based on general guidance from the SSN-WG, each Administration and appropriate Staff Office is developing its own 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 and include a wide variety of steps. Appendix A contains VA's first version of the complete plan. The timeframes shown for most of the tasks in Phases Two, Three, Four and Five are placeholders. More accurate timeframes, and more accurate task descriptions, will be developed by the end of 2007. Until then, the plan will default, in general, to showing current activities to be completed by March 2008, short-term activities to be completed by October 2008, and long-term activities to be completed by March 2009 or later.

VA shares data with many government agencies, business partners, and private organizations. This is necessary in order to 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. Because of the complex nature of VA data sharing, each Administration must assess their data sharing activities and through a OneVA initiative coordinated across the Department, coordinate with these entities to determine the impact of replacing the SSN with another unique identifier.

As illustrated in Figure 1, a preliminary plan to eliminate the unnecessary collection and use of the SSN throughout the Department has been developed. This plan will evolve as the SSN-WG establishes a baseline of systems and activities that currently collect and use the SSN (see Phase Two for more detail). This baseline will identify the following: the data in specific systems; how the data are cross referenced within the Department: and how the data are matched with data found in other Government systems.

Figure 1: Summary of SSN Plan

ID		Task Name	Duration	Start	Finish
1		**Create SSN Working Group**	484 days	Mon 5/21/07	Thu 3/26/09
114		**Phase 1 – Accomplishments thru May 2007**	0 days	Mon 5/21/07	Mon 5/21/07
115		Re Veteran SSN–Unnecessary Use	0 days	Mon 5/21/07	Mon 5/21/07
135		Re Employee SSN– Unnecessary Use	0 days	Mon 5/21/07	Mon 5/21/07
144		Increased SSN Protection When Required	0 days	Mon 5/21/07	Mon 5/21/07
157		**Phase Two – Current Activities**	485 days	Mon 5/21/07	Fri 3/27/09
158		Baseline	146 days	Mon 5/21/07	Mon 12/10/07
172		Feasability of Using New Unique Identifiers	485 days	Mon 5/21/07	Fri 3/27/09
173		New Veteran identifiers	485 days	Mon 5/21/07	Fri 3/27/09
190		New Employee Identifiers	129 days	Mon 5/21/07	Thu 11/15/07
193		Other Current Activities and Initiatives	266 days	Mon 5/21/07	Mon 5/26/08
194		Veteran Focused	266 days	Mon 5/21/07	Mon 5/26/08
207		Employee Focused	225 days	Mon 5/21/07	Fri 3/28/08
212		**Phase Three – Prioritization**	30 days	Tue 12/11/07	Mon 1/21/08
216		**Phase Four – Short-Term Actions**	365 days	Mon 5/21/07	Fri 10/10/08
217		VA-wide Short-term Actions	313 days	Wed 8/1/07	Fri 10/10/08
225		Specific Administration Short-term Actions	360 days	Mon 5/21/07	Fri 10/3/08
226		VHA	270 days	Mon 5/21/07	Fri 5/30/08
229		VBA	360 days	Mon 5/21/07	Fri 10/3/08
233		**Phase Five – Long-term Actions**	1387 days	Mon 5/21/07	Tue 9/11/12
234		VA-wide Mid and Long-term Actions	1292 days	Mon 10/1/07	Tue 9/11/12
248		Special Administration/Staff Office Mid and Long Term Actions	900 days	Mon 5/21/07	Fri 10/29/10
249		VHA	900 days	Mon 5/21/07	Fri 10/29/10
256		OIG	500 days	Mon 5/21/07	Fri 4/17/09
258		**Phase Six – Oversight and Monitoring**	490 days	Fri 5/25/07	Thu 4/9/09
259		Bi-weekly updates to the plan	483 days	Fri 5/25/07	Tue 3/31/09
309		Quarterly briefings to VA senior management	481 days	Fri 5/25/07	Fri 3/27/09
319		Submission of FISMA report	490 days	Fri 5/25/07	Thu 4/9/09

A. *Phase One – Accomplishments*

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 the Department of Defense, the Social Security Administration, the Internal Revenue Service, and the Department of Education. Currently, VA uses the SSN to identify employees for employment-related record keeping, and identify veterans and their dependents to ensure the accurate delivery of VA benefits and services.

Phase One consists of identifying 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 an employee's SSN; and (3) to protect a veteran's SSN or employee's SSN when collection and use is required by law or regulation. These initiatives, undertaken over the past several years, include the following:

1. 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 stripe.

- The veteran's SSN was removed from enrollment notification/welcome letters.

- The SSN no longer appears on income verification-related correspondence. Instead, a unique internal, non-SSN based case number is assigned to each income earner whose income is verified. In addition, the Health Eligibility Center (HEC) has begun using barcode technology in lieu of displaying any identifier. The internal case number, in the same manner, does not provide any identifying information about a patient.

- The VA Consolidated Mail Outpatient Pharmacy (CMOP) has eliminated the use of SSNs on prescription bottles and mailing labels. In most cases all elements of the SSN have been eliminated, however, the last four digits of the SSN are used when a name is very common. This is done as a second measure of security to ensure that the correct prescription is being sent to the patient for whom it is intended.

- All occurrences of the SSN have been removed from the VHA Volunteer Database.

- In VA Medical Centers and community-based outpatient clinics (CBOCs), the corporate software (known as VistA) no longer prints the SSN on communication mailings, including scheduling reminders and no-show correspondence to veterans.

- The veteran's SSN was removed from monthly co-pay billing statements.

- The veteran's SSN was removed from VA Form 10-7078 (used for authorization of Civil Hospital and Community Nursing Home care) and from VA Form 10-7079 (used for authorization of short term and Home Health).

- The SSN is masked in Explanation of Benefits (EOBs) generated for the Civilian Health and Medical Program of Department of Veterans Affairs (CHAMPVA), Spina Bifida Health Care Program (SB) and Foreign Medical Program (FMP). EOBs are letters sent to both the beneficiary and provider to explain VA payment actions in response to health care provider invoices.

- The veteran's SSN was removed from health care authorization cards issued for CHAMPVA, SB, and Children of Women Vietnam Veterans Health Care Program (CWVV).

- The veteran's SSN was removed from Customer Contact Letters, which advise individuals of upcoming life events that may impact their enrollment in the health plan.

- VHA has scrambled or truncated the number when the SSN is needed for identity verification but can be hidden during use.

- Updated and strengthened procedures for handling changes to address and direct deposit information (submitted to VBA) to ensure proper verification of identity of individual requesting the changes.

- Benefits Delivery Network (BDN) generated award notification letters from the Education Service now only display the last four digits of the veteran's SSN.

- BDN generated direct deposit election letters from the Education Service now only display the last four digits of the claimant's SSN. In addition, the type of account (e.g., checking) and the bank's routing number were removed, and only the last four digits of the account number are displayed.

- The corporate application (CWINRS) for the Vocational Rehabilitation and Employment (VR&E) Service now only displays the veteran's name and last four digits of the claimant's SSN on all documents (i.e., forms and letters) printed out of the application.

- The VR&E Service issued new procedures limiting contractor access to Counseling-Evaluation-Rehabilitation (CER) folders. Contractors are only provided information they need to fulfill the contract. Any PII that is not necessary to fulfill the contract is redacted from the documents.

- The VR&E Service modified BDN generated direct deposit election letters for beneficiaries receiving a subsistence allowance (Ch 31) to only display the last four digits of the veterans SSN, remove the bank routing number, and only display the last four digits of the account number.

- The Insurance Service modified the Veterans Insurance Claims Tracking and Response System (VICTARS) application to eliminate the printing of the SSN on the Designation of Beneficiary form.

- All personally identifiable information (PII) has been stripped from assignment emails in the ExecVA system. These emails are used to include the issue description including all of the veteran's PII. Only those persons with the appropriate rights, and a username and password can see the PII in the system. All user accounts and rights are first approved by the Office of the Secretary before they are created.

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

- Employee SSNs have been eliminated or truncated in most Personnel and Accounting Integrated Data (PAID) system HR-related outputs such as forms, notices, and reports.

- The SSN no longer appears on all routine email correspondence from the Office Human Resources Management.

- Where VA employees are required to transmit HR data that contains the SSN in electronic form, policies have been established that require that only encrypted email be used.

- The full SSN was truncated to the last four digits of the SSN on all employee bi-weekly pay statements.

- The SSN has been truncated to the last four digits of the SSN on all mail-in supply reorder cards.

- Where employees' SSNs are used within VHA research, administrative planning and even human resources, the SSN is scrambled when possible so that the actual SSN is not visible on electronic displays or when printed. In other cases, it is reduced to the last four digits of the SSN. While these methods do not completely eliminate the use of the SSN and are not considered under HIPAA legislation to be de-identified, they do reduce the risk of theft or misuse of the number when being used for these purposes.

- NCA has removed the SSN from all correspondence regarding job inquiries and notifications.

- The SSN is not used on any identification badges/materials.

3.   Completed Initiatives Regarding Increased Protection of SSNs When Collection and Use Is Required by Law or Regulation

- 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 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. The ICN is not displayed or used by humans to research information about patients. It is a system-to-system identifier only. It does not provide any information about the patient, per se.

- The current interface between DoD and VA (DEERS – to – VADIR) in RE/CM uses a secure, encrypted, dedicated transmission mechanism. All data transfers / matching between DoD and VA utilize unique system level identifiers (DoD EDI PI and VA ID) and not SSN. All data transfers containing SSN information within VA are done using

encryption and secure transmission mechanisms. To the extent possible, the SSN is eliminated in all routine email correspondence; if the SSN is required only encrypted email is used.

- VA has verified the continued need of 831 recurring data exchanges that provide Privacy Act protected data to non-VBA entities.

- Issued standardized Work-at-Home/FlexiPlace procedures for VBA employees that require individuals to ensure protection of PII. Additionally, individuals are prohibited from downloading or saving personally identifiable information (PII) to their computer's hard drive.

- Issued new shipping procedures to ensure that any hard-copy documents containing PII are sent via carrier that offers package tracking.

- VA has discontinued the use of unencrypted thumb drives and requires the use of a specific, more secure, auto-encrypting thumb drive.

- SSNs have been removed from all end user security agreements and truncated to the last four digits of the SSN on all end user Security Agreements.

- The SSN has been removed from all hard copy reports and forms printed from ROES and the Denver Acquisitions and Logistics Center (DALC) production system. The SSN has been hashed out in all transmission between Veterans Affairs Medical Center (VAMC) facilities and the DALC. SSN in transmission between E-Authentication infrastructure and the DALC have been hashed out.

- The SSN field of many Electronic Data Interchange (EDI) transactions has been truncated to the last four digits of the SSN.

- VA recently installed a filter at all VA electronic mail gateways that scans all outgoing e-mails for patterns resembling the SSN. If a pattern is recognized as an SSN, the sender is sent a notice warning that a pattern resembles the SSN, and that sending this information could be a violation of VA. It reminds the sender that SSNs should be removed or encrypted prior to being sent, and directs the individual to his or her Information Security Officer (ISO) if they need more information.

- VA is currently reviewing all occurrences of the SSN in letters mailed to individual veterans. Currently, the implementation of VHA audiogram-related application that displays full SSNs is underway. A limited roll-out of this application that does not display the SSN has begun.

- In 2006, the VA Office of Inspector General (OIG) issued a comprehensive end user policy that focused on the protection of all PII. In conjunction with that initiative, OIG implemented an enterprise encryption solution that protects hard drives, encrypts e-mail messages across OIG, and encrypts removable storage devices such as DVDs, CDs, or hard drives. Also, as part of OIG's policy review last year, all OIG employees were enrolled in a new rules of behavior certification, which places an emphasis on protecting PII. OIG is also conducting a purge of paper throughout all OIG offices, which will

result in the shredding of documents no longer needed to support OIG's oversight work and reports.

- The OIG has conducted an analysis of its use of PII in general, which encompassed SSNs. OIG is putting in place policy and procedures that will virtually eliminate the use of SSNs in large data sets that support OIG oversight work. OIG has set in place processes to de-identify the large data sets. In those instances where there is an absolute need for PII, OIG envisions using small samples of data under rigorous controls by senior managerial staff.

B. Phase Two – Current Activities

Phase Two has three separate components: (1) the development of a baseline of systems that identifies current collections and uses of the SSN; (2) the feasibility of creating and using new unique identifiers for veterans and employees; and (3) a list of other current initiatives and activities underway at VA. Each component will start within the next six months.

1. Baseline

Before changing or eliminating the SSN from a particular form or system, each Administration and Staff Office within VA has to 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? From a data collection form or second hand?
- What is the legislative or regulatory mandate 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?

The development of the baseline will be a compilation of the following:

- Information collected from the June 2006 VA Office of General Counsel data call requesting from all Administrations and Staff Offices on systems containing SSNs.
- Information from the December 2006 OMB survey of all Federal agencies to identify any processes, systems, or forms not already authorized by OBM that collect the SSN.
- A current review of the VA Security Management and Reporting Tool (SMART) inventory of VA systems containing PII.
- A separate inventory of VA OMB authorized forms.
- A 2006 review of how VistA uses the SSN (it used an Analysts Office tool to search the entire VistA data dictionary for SSN references).
- 2007 compilation of VBA computer systems and applications that use the SSN.
- A review of VA Privacy Impact Assessments (PIAs).
- A current review of websites collecting/using SSNs.
- A review of Enterprise Architecture Baseline inventory of VA systems.

The baseline will also include input from the Administrations and Staff Offices to ensure that all VA systems that collect data have been considered for inclusion.

Following the establishment of the baseline, VA will determine those systems and essential activities that require the use of the SSN. Those that do not require the use of the SSN will need to be modified and, they will be included in the actions in Phase Four or Phase Five below. A partial list of VA forms, systems, and processes that collect and/or use the SSN contains more than 800 items. These items range from Physical Access Controls to major applications such as the Veterans Health Information Systems and Technology Architecture (VistA). The baseline should be completed by December 2007. A separate baseline of external systems used for data sharing with business partners will be developed in Phase Four.

2. Feasibility of Using New Unique Identifiers

VA has begun to explore new ways to identify veterans and employees in its systems and processes. Initial work has begun regarding veteran identifiers, but implementation of new veteran unique identifiers will be a long-term activity that will appear in Phase Five of the VA plan.

a. New Veteran Identifiers

VA has begun to explore the feasibility of using new unique identifiers, and the possibility of a "One VA" identifier instead of different identifiers used among the various administrations. The objective is to develop a unique VA patient number and unique VA benefit identification number for each veteran.

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. VA found that replacing the present SSN-based identifier would be complex and that broad action would be necessary to accomplish this goal. The replacement of the SSN as an identifier should be approached as a OneVA effort to avoid: (1) the possibility of veterans having multiple identifiers in VA systems, 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 Department of Defense (DoD). Also, the anticipated publication of the HIPAA Individual Identifier Rule may have a bearing on the approach that is implemented. Changing to a non-SSN based identifier will stop the need for many, but not all, VA systems to capture and store 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 VA Enterprise ID task force has been chartered to develop new VA ID. Efforts are going on throughout the organization eliminate SSN as an internal database identifier. Work is ongoing to correlate millions of service member/veteran person records between DoD and VA, utilizing unique identifiers – VA ID and DoD EDI PI.

- VA must work with numerous agencies and entities to develop a common unique identifier. These include, but may not be limited to, the following:

o Department of Defense
o Social Security Administration
o Department of Treasury (including the Internal Revenue Service)
o Department of Labor
o Public Health Service
o Centers for Disease Control and Prevention
o Centers for Medicare and Medicaid
o Defense Finance and Accounting Service
o U.S. Coast Guard
o Office of Servicemember's Group Life Insurance (Prudential Financial Inc)
o State Rehabilitation Agencies
o Public and Private Educational Institutions

The discussion on new veteran identifiers has begun, but it will be a long and complicated process. VA plans to reach a decision on what to use for a new veteran identifier by March 2009, but implementation will occur in 2010 and 2011.

b.   New Employee Identifiers

For the past year, VA has participated in the OPM task force chartered to create a Unique Employee Identification Number (UEID) for all Federal employees. VA current employee identifier is the SSN. Once OPM finishes its work, all agencies, including VA, will be required to replace their current employee identifier with the UEID. VA expects OPM to provide detailed guidance on the UEID by November 2007. Implementation of the UEID will occur in Phases Three and Four.

3. Other Current Activities and Initiatives

There are several activities and initiatives underway regarding the reduction and elimination of the SSN at VA. Some are veteran-focused, and some are employee-focused. The initial plan in Appendix A currently shows most of these activities to be completed by May 2008. However, some of these dates may change after the baseline is completed, and all Administrations and Staff Offices have had a chance to review the baseline with the plan.

a.   Veteran Focused

- VA is an active participant in the Interagency Best Practices Collaborative (moderated by the Social Security Administration).

- VA is in the process of issuing a comprehensive policy that focuses on the protection of all PII.

- Each Administration will examine and validate SSN usage and assess alternatives to using SSNs (based on information from the baseline).

- VA is examining current data collection forms and websites to determine which ones collect the SSN and will explore the feasibility of removing the SSN from these collections.

- VA is reviewing all of its System of Records Notices (SORNs) to identify all systems that use the SSN.

- VA is conducting an assessment of existing laws and regulations that require the use of the SSN as an identifier for various VA operations.

- The Education Service has submitted a project initiation request to eliminate the display of a veteran's full SSN on PC Generated Letters (PCGL). The change will result in only the last four digits being displayed.

- The Insurance Service has initiated a change to remove the claim number/SSN field currently displayed on Veteran Mortgage Life Insurance (VMLI) annual statements and letters.

- Management of the Electronic Contract Management System (eCMS) operations efforts completed research on the feasibility of eliminating the SSN from any and all solicitations or contractual documents. This was done with the intent to eliminate use of SSN in all VA procurement documents.

- The veteran's name and SSN will be removed from bulletins generated on VistA that are triggered by the "Enrollment System Redesign project. Identifying information on these VistA bulletins will include the VA Person Id (VPID) and Station#/Database File Number (DFN). VistA users will search for the patient's record by entering the DFN.

- Currently, a request has been submitted to restrict the display of patient identifying information, including the SSN, on any printed material from VistA. This is a very wide reaching project, which requires extensive analysis and planning. Current efforts include identification and prioritization of all documents that contain patient SSNs when printed.

- The patient's name and SSN will be removed from the Computerized Patient Record System progress note work copy, used by clinicians for rounds. The headers and footers from progress notes will be removed when printed as letters.

- Discussions are ongoing with the VA procurement policy staff regarding acquisition regulations that reference SSN.

- VA is implementing an enterprise encryption solution that encrypts hard drives, e-mail messages, and removable storage devices across VA.

b.   Employee Focused

- The Time and Attendance displays to the employee, such as Leave request options, will be modified to display only the last four digits of the SSN.

- The PAID Separation Statistics report that includes the full SSN will be modified so that the last four digits of the SSN will be replaced by NNNNs.

- VA is working toward the further elimination of SSN or truncated SSN (last four digits) in all internal employee documentation.

- Efforts are being made to mask the display of the SSN on PAID input screens as employees work on employee electronic PAID records.

C. Phase Three – Prioritization

In Phase Three, the SSN-WG will work with each Administration to review the systems, laws, regulations, forms, services, documents and other areas that contain or require the use of the SSN for employees or veterans. From this, they will identify short, medium and long-term priorities and estimate the costs associated with eliminating the unnecessary collection and use of the SSN. Then, VA will reevaluate which systems use veterans' SSNs, and which contain employee SSNs. The costs of these efforts will then be assessed, and the priorities may be reordered based upon budgeting, staffing and availability of other resources, as well as upon the assessment of risk associated with each activity.   VA initially anticipates this task to be completed by the end of January 2008.

VBA has already provided a high level list of short-term, medium-term, and long-term priorities to the SSN-WG:

Program	Priorities
Compensation & Pension	Short-Term • Assess feasibility of implementing procedural change to reinstate establishment of claim numbers. Mid-Term • Evaluate ability to mask SSN where necessary. Long-Term • Collaborate with Department and other Federal agencies to establish a common identifier • Modify systems/applications and assess costs based on establishment of common identifier
Education	Short-Term • Complete removal of full of SSN from all correspondence. Mid-Term • Assessment of the viability of using VA assigned claim numbers for communication with claimants.

	• Assessment of the viability of using an alternative identification system for inter-agency communication and data exchange. **Long-Term** • Collaborate with Department and other Federal agencies to establish a common identifier. • Modify systems/applications and assess costs based on establishment of common identifier.
Loan Guaranty	**Short-Term** • Evaluate whether SSN can be removed from correspondence. **Mid-Term** • Remove access to full SSNs and establishment of a secure storage area to store SSNs. **Long-Term** • Collaborate with Department and other Federal agencies to establish a common identifier. • Modify systems/applications and assess costs based on establishment of common identifier.
Vocational Rehabilitation & Employment	**Short-Term** • Evaluate ability to mask SSN where necessary. **Mid-Term** • Continue to evaluate the need for SSN usage. • Explore alternatives to SSN usage. **Long-Term** • Collaborate with Department and other Federal agencies to establish a common identifier. • Modify systems/applications and assess costs based on establishment of common identifier.
Insurance	**Short-Term** • Complete VICTARS programming to eliminate the full display of an insured's SSN (removal of SSN from reports and correspondence). • Establish a policyholder's date of birth as the primary method to authenticate a caller in the Operations Division (Call Center). **Mid-Term** • Utilize PIN and User ID for web-based applications. **Long-Term** • Collaborate with Department and other Federal agencies to establish a common identifier. • Modify systems/applications and assess costs based on establishment of common identifier

D. Phase Four – Short-Term Actions

Phase Four comprises VA's short-term plans for eliminating the unnecessary use of the SSN. Many of these short-term plans are VA-wide. The other short-term plans are Administration specific. The initial plan in Appendix A currently shows all of these activities to be completed by October 2008. However, some of these dates may change after the baseline is completed, and all Administrations and Staff Offices have had a chance to review the baseline with the plan.

1. VA-wide Short-Term Actions

- A complete analysis of all existing systems to determine where SSN is used for primary lookup purposes as well as where it is routinely displayed must be accomplished to determine exactly how many programming changes will have to be made, grossly estimated to be in the thousands. This will build upon the baseline developed in Phase Two. The business community must be engaged to determine whether the SSN must continue to be used for look up or displayed within specific applications. The need for continued use of the SSN in all of these areas requires an understanding of the system, its purpose and processes, program or law/regulation to assure proper disposition of the continued use of the SSN.

- All exchanges of veteran and employee data/data sharing with business partners must be identified and analyzed to determine where SSN is issued for unique identification and where it is routinely displayed. This is a separate baseline from the one developed in Phase Two Decisions will need to be made on continued use of the SSN or use of a replacement identifier with all business partners where SSNs are used.

- VA will produce a substitute for the paper Notification of Personnel Action (SF 50). This form is currently required by OPM to include the SSN of the employee. This form is currently printed from the PAID database sent via mail to local HR offices. Efforts are being made enable the system to transmit these forms electronically. They will then be printed onsite. Printing the documents onsite will reduce the chance of compromise by intercepted or misdirected mail.

- The VA Electronic Commerce Business Solutions Office (ECBSO) will issue guidance to the VA acquisition community on the elimination of the use of SSN in procurement documents through an update to the Electronic Contract Management System (eCMS) Information Letter.

- The Office of Information and Technology will periodically assess whether all data transmissions (at rest and in motion) within VA are meeting VA security standards.

- All printed forms will be formally reviewed in order to determine the necessity of full or truncated SSN.

- There will be a review of physical storage of printed end user Security Agreements.

2. Specific Administration Short-Term Actions

VHA's short-term plans include the following:

- Conduct a thorough review and assessment, and in-depth business needs analysis of SSN use across VHA information systems and processes. This analysis must be performed for all areas and functions within VHA including services, programs, systems, system

displays and outputs, forms, and data collection and/or storage areas (including Class III/local facility developed and vendor-produced/purchased software).

- All databases and registries used throughout VHA, within VISNs or medical centers, must be identified and reviewed.

VBA's short-term plans will assess the following alternatives to using the SSN.

- Reinstitute assignment 8-digit claim number

- Utilize 8-digit corporate participant identification number

- Utilize the Department of Defense's electronic identifier: Electronic Data Interchange Person Identifier (EDIPI)

E. Phase Five – Long-Term Actions

Phase Five addresses the implementation of the decisions made in Phase 2, plus other actions that have already been identified but which are known to have long implementation timelines. With general guidance from the SSN-WG, each Administration and Staff Office is responsible for its methodology for developing medium-term and long-terms for complying with OMB's mandate to eliminate the unnecessary collection and use of the SSN. The initial plan in Appendix A currently shows most of these activities to be completed by January 2009 or later. However, some of these dates may change after the baseline is completed, and all Administrations and Staff Offices have had a chance to review the baseline with the plan.
'

1. VA-wide Medium-Term and Long-term Actions

- VA will review and develop action plan to address corrections based on the system-wide assessment.

- Analyze how (or if) the use of the SSN can be restricted, suppressed or eliminated, including identifying where standardized processes or software can be used for more than one application area.

- Once OPM has issued guidance on the UEID, VA will begin to replace the present SSN-based identifier for employee records.

- VA will finalize its approach regarding new unique veteran identifier(s). Mid-term, there are plans to convert current OneVA applications using SSN queries to be converted to use only name search function or to use an agreed upon external OneVA identifier. This plan includes converting SSN queries being used in any application utilizing OneVA VA/DOD Identity Repository (VADIR) repository to use an agreed upon alternative unique identifier or name search only. Long-term plans include the implementation of an enterprise-wide identity management solution, which would supply an internal/external VA identifier. This identifier would be correlated with Administration unique identifiers

(if VBA, VHA, and NCA don't use the enterprise identifier). Once the unique identifier is available, OIT will be able to modify all extracts and data transfers to utilize it.

- VA will explore the feasibility of implementing a "Veteran ID number" that is not related to the SSN directly but is used to distinguish one veteran from another.

- VA plans to convert all employee paper Official Personnel Folders (OPFs) to a more secure electronic OPF (eOPF). Currently, forms mandated by OPM require that the SSN be used. These forms are printed and stored at local HR facilities. The eOPF will not be printed, and the SSN will not be visible on forms found in the eOPF

- Long-term plans call for the replacement of the current PAID system with a new Human Resources Information System that does not use the SSN as the employee identification number at all.

- Mid-term, the Electronic Business Solutions Office (ECBSO) system would like to seek an agency deviation to Federal Acquisition Regulations so that VA can eliminate use of the SSN from all clauses included in VA procurement documents. Long-term, ECBSO plans to work with OMB's Office of Federal Procurement Policy to have federal acquisition regulations updated to eliminate use of the SSN, unless that particular collection and use of the SSN is deemed to be required for reasons of national security.

- Plans for medium-term efforts that will be performed by the Remote Order Entry System (ROES) system are to review all storage instances of full SSN in database files, a review of SSN usage where ROES interfaces with other VA systems. The Denver Acquisitions and Logistics Center (DALC) will also perform a review of all SSN displays in the ROES and other internal DALC applications and devise a plan for their elimination.

- A review of contracts with commercial vendors/business associates is planned for compliance with the overall plan to eliminate the unnecessary use of SSNs.

- VA is currently working to get all of the people who may be associated with the information collected and put into the system to become users of the ExecVA, therefore simplifying the process and creating a closed system.

2. Specific Administration/Staff Office Medium-Term and Long-Term Actions

This section provides a high level summary of some of the Administration and Staff Office medium-term and long-term actions. This list will grow significantly with the completion of the Phases Two and Three.

VHA's medium-term plans include the following:

- Prioritize all systems, areas, laws, regulations, forms, services, documents, and other areas within VHA that contain or require the use of a veteran's SSN.

- Replace the present SSN-based identifier for veteran records (temporary display of last 4 digits of the SSN in the medium term, followed by the cessation of SSN display in the long term). Potential options for unique replacement identifier are identified below. Each of these options will need to be studied and evaluated in detail to determine the most effective and efficient substitute that meets policies and legislation and VA's internal and external business needs.

  o Existing Integration Control Number (ICN)/VA Patient Identifier (VPID) can be used; the ICN/VPIDs are produced by the Master Patient Index (MPI) for all active patients and the Administrative Data Repository for Non-patients, and are composed of a 17-digit unique non-intelligent number based on the Universal Healthcare Identifier Standard from American Standards and Testing Materials (ASTM) E-1714 standard for conformance. Generally, it is designed to be used in machine-to-machine transactions only; however, it could be used for some look-up purposes such as replacing the SSN on the Veterans Identification Card (VIC) card however modifications to lookup functionality would have to be done as the ICN/VPID is not a static number. It may have other look-up capabilities but those would need to be analyzed as noted above for usability as the ICN is intended for machine to machine transactions and not humans.

  o Modification to the ICN could be used. It is possible for an internal index (currently the ICN) to be used to derive an externally facing member number, thus preserving the ICN as an internal, machine-to-machine index.

  o A unique number from another source could be used. Ideally, the unique identifier called for in the HIPAA legislation would serve VA and all providers of health care, but would require Congressional action since development of this Rule is currently on hold. The Health Insurance Portability and Accountability Act (HIPAA) standard identifier provisions for health care providers and third party payors will reduce VA's dependence on the SSN.

VHA's long-term plans include the following:

- Begin the task of removing, restricting or eliminating the use of the veteran SSN, including those with external business partners such as Department of Defense, which utilizes the SSN as a key identifier for electronic data exchanges with VHA.

- Modify the Health Provide Systems (HPS) VistAWeb- to replace the full SSN with only the last 4 numbers of the SSN.

- Modify the printed pharmacy documents given to the patient by removing the SSN display. This change will impact the ability of any user who may need to look up or request prescription refills from one of the printed documents.

- The SSN embedded in the barcode and magnetic stripe is used to look up a veteran's record by a number of VistA applications. Modifications to encrypt the SSN or move to a new unique identifier are pending direction.

OIG is putting in place policy and procedures that will virtually eliminate the use of SSNs in large data sets that support OIG oversight work.

F. Phase Six – Oversight and Monitoring

The key to the success of any effort is to monitor and report progress to an oversight body. The 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. 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. In addition, OPRM compiles a quarterly report on the progress and submit it with the quarterly FISMA filing.

II. *Issues*

There are two 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 quite heavily as a positive unique identifier at VA. There are many system changes needed before VA can implement new unique identifiers that re not based on the SSN. It will be a challenge to find a reliable unique identifier without that identifier eventually causing the same challenges as are currently present with the SSN. Second, 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, volunteers. Much education and retraining must take place to break the habit of using the SSN as the primary way to verify identity.

III. *Summary*

VA has taken many steps to eliminate the usage of SSNs where these uses 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. 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, 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 fully protected and all information about our nation's veterans is treated with the highest level of confidentiality and the utmost respect.

Appendix A – SSN Plan (as of 9-17-07)

ID		Task Name	Duration	Start	Finish	2007					2008		
	ℹ					Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3
1		**Create SSN Working Group**	**484 days**	**Mon 5/21/07**	**Thu 3/26/09**								
2		Draft memo	0 days	Mon 7/9/07	Mon 7/9/07			7/9					
3		Select members	0 days	Mon 7/16/07	Mon 7/16/07			7/16					
4		Kickoff meeting	0 days	Wed 7/25/07	Wed 7/25/07				7/25				
5		Review initial plan	20 days	Wed 8/22/07	Tue 9/18/07								
6		Approve initial plan for annual FISMA report	0 days	Tue 9/18/07	Tue 9/18/07				9/18				
7		**Conduct weekly meetings**	**481 days**	**Thu 5/24/07**	**Thu 3/26/09**								
105		**Review and approve future plans for FISMA Reports**	**480 days**	**Mon 5/21/07**	**Fri 3/20/09**								
114		**Phase 1 – Accomplishments thru May 2007**	**0 days**	**Mon 5/21/07**	**Mon 5/21/07**		5/21						
115		**Re Veteran SSN–Unnecessary Use**	**0 days**	**Mon 5/21/07**	**Mon 5/21/07**		5/21						
116		New VIC cards no longer display SSN	0 days	Mon 5/21/07	Mon 5/21/07								
117		SSN Removed from enrollment notification/welcome letters	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
118		SSN no nlonger on income verification-related correspondence	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
119		CMOP eliminated SSn on prescription bottles and mailing labels	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
120		SSN removed from VHA Volunteer database	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
121		VistA no longer prints SSN on communication mailings	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
122		SSN removed from all monthly co-payment billing statements	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
123		SSN removed from VA Form 10-7078 and 10-7079	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
124		SSN is masked on explination of benefits for CHAMPVA, SB and FMP	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
125		SSN removed from health care authorization cars for CHAMPVA, SB, and	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
126		SSN removed from Customer Contact Letters	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
127		VHA scrambled or truncated SSN when needed for verification; SSN hidden during	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
128		Updated and strengthened procedures for handling changes to address and direct	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
129		Only last 4 of SSN on BDN generaled direct deposti election leteres from Ed.	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
130		CWINRS only displays name and last 4 of SSN on all printed documents	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
131		VR&E Ser. Limit contractor access to ER folders	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
132		Only last 4 of SSN on BDN generated direct depoist election letters for	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
133		VICTARS modified so SSN removed from Designation of Beneficiary Form	0 days	Mon 5/21/07	Mon 5/21/07		5/21						
134		Al PII stripped from assignment emails on the ExecVA system.	0 days	Mon 5/21/07	Mon 5/21/07		5/21						

ID	ⓘ	Task Name	Duration	Start	Finish	2007 Qtr 4	2007 Qtr 1	2007 Qtr 2	2007 Qtr 3	2007 Qtr 4	2008 Qtr 1	2008 Qtr 2	2008 Qtr 3
135		**Re Employee SSN – Unnecessary Use**	**0 days**	**Mon 5/21/07**	**Mon 5/21/07**			5/21					
136		SSN's have been eliminated or truncated in most PAID system HR-related outputs	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
137		SSN no longer appears on all routine email correspondence from OHRM	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
138		HR data must be encrypted before sent in electronic form	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
139		SSN truncated to last 4 digits on all bi-weekly pay statements	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
140		SSN truncated to last 4 digits on all mail-in suppply reorder cards	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
141		SSN scrambled or reduced to last 4 digits when used within VHA research,	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
142		SSN removed from all NVA job related correspondence	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
143		SSN is not used on any ID badges/materials	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
144		**Increased SSN Protection When Required**	**0 days**	**Mon 5/21/07**	**Mon 5/21/07**			5/21					
145		ICN used as identifier in VHA systems	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
146		Encryption and dedicated transmissions for DoD-VA interface	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
147		Completed review of 831 recurring VBA data exchanges that have PII	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
148		Standardized Work at Hoem/FlexiPlace procedures for VBA employees	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
149		Shipment of documents with PII via carrier with package tracking	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
150		Eliminated use of unencrypted thumb drives	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
151		SSN removed from ROES and DALC reports and printed forms	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
152		SSN truncated to last 4 on EDI transactions	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
153		Installation of filter on all I gateways to scan for emails containing SSN	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
154		Elimination of SS from VHA audiogram-related application	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
155		OIG comprehensive end user policy on protection of PII	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
156		OIG processes to de-identify large data sets to maximum extent possible	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
157		**Phase Two – Current Activities**	**485 days**	**Mon 5/21/07**	**Fri 3/27/09**								
158		**Baseline**	**146 days**	**Mon 5/21/07**	**Mon 12/10/07**								
159		GC data call April 2006	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
160		OMB data call December 2006	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
161		Review of PIAs	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
162		Review of OMB authorized forms	40 days	Mon 7/30/07	Fri 9/21/07								
163		Review of SMART Database	35 days	Mon 7/30/07	Fri 9/14/07								
164		Review of EA Baseline inventory	10 days	Mon 9/17/07	Fri 9/28/07								
165		Review of VISTA uses of SSN	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
166		Compilation of VBA computer systems and applications using the SSn	0 days	Mon 5/21/07	Mon 5/21/07			5/21					
167		Current review of websites collecting/using SSNs	45 days	Mon 7/2/07	Fri 8/31/07								
168		Initial Inventory Complete	0 days	Mon 10/1/07	Mon 10/1/07					10/1				
169		Review Authorities – are they essential and legislatively mandated	40 days	Tue 10/2/07	Mon 11/26/07								
170		Revise inventory to unnecessary collections and uses	10 days	Tue 11/27/07	Mon 12/10/07								
171		Inventory complete	0 days	Mon 12/10/07	Mon 12/10/07					12/10				

ID	ⓘ	Task Name	Duration	Start	Finish	2007				2008		
						Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3
172		**Feasability of Using New Unique Identifiers**	**485 days**	**Mon 5/21/07**	**Fri 3/27/09**							
173		**New Veteran identifiers**	**485 days**	**Mon 5/21/07**	**Fri 3/27/09**							
174		Initial exploration completed 2006	0 days	Mon 5/21/07	Mon 5/21/07			5/21				
175	▦	VA Enterprise ID task force develops approach to new VA ID	226 days	Mon 5/21/07	Mon 3/31/08							
176		**Coordinate with Other Agencies**	**485 days**	**Mon 5/21/07**	**Fri 3/27/09**							
177		DoD	480 days	Mon 5/21/07	Fri 3/20/09							
178		SSA	480 days	Mon 5/21/07	Fri 3/20/09							
179		Treasury	480 days	Mon 5/21/07	Fri 3/20/09							
180		Labor	480 days	Mon 5/21/07	Fri 3/20/09							
181		Public Health Service	480 days	Mon 5/21/07	Fri 3/20/09							
182		Centers for Disease Control and Prevention	480 days	Mon 5/21/07	Fri 3/20/09							
183		Centers for Medicaid and Medicare	480 days	Mon 5/21/07	Fri 3/20/09							
184		Defense Fiance and Accounting Service	480 days	Mon 5/21/07	Fri 3/20/09							
185		U.S. Coast Guard	480 days	Mon 5/21/07	Fri 3/20/09							
186		Office of Servicemembers Group Life Insurance	480 days	Mon 5/21/07	Fri 3/20/09							
187		State Rehabilitation Agencies	480 days	Mon 5/21/07	Fri 3/20/09							
188		Public and Privacy Educational Institutions	480 days	Mon 5/21/07	Fri 3/20/09							
189		Participate on Interagency Best Practices Collaborative	485 days	Mon 5/21/07	Fri 3/27/09							
190		**New Employee Identifiers**	**129 days**	**Mon 5/21/07**	**Thu 11/15/07**							
191		Participate on OPMUEID task force	118 days	Mon 5/21/07	Wed 10/31/07							
192	▦	OPM issues guidance on UEID	0 days	Thu 11/15/07	Thu 11/15/07				11/15			
193		**Other Current Activities and Initiatives**	**266 days**	**Mon 5/21/07**	**Mon 5/26/08**							
194		**Veteran Focused**	**266 days**	**Mon 5/21/07**	**Mon 5/26/08**							
195	▦	Comprehensive policy on protection of PII	118 days	Mon 5/21/07	Wed 10/31/07							
196		Examination/validation of SSN usage and assess alternatives	120 days	Tue 12/11/07	Mon 5/26/08							
197		Examine ways to remove SSn from data collection forms and websites	40 days	Mon 9/3/07	Fri 10/26/07							
198	▦	Review all SORNs to identify all systems that use SSN	30 days	Mon 7/23/07	Fri 8/31/07							
199		Elimination of SSN on Education Service PC Generate Letters	225 days	Mon 5/21/07	Fri 3/28/08							
200		Remove claim number/SSN on Insurance Service VMLI annual	225 days	Mon 5/21/07	Fri 3/28/08							
201		Assess feasiblity of eliminating SSN from all solicitation/contractual	120 days	Mon 5/21/07	Fri 11/2/07							
202	▦	Veterans name and SSN removed from bulletins generated by VistA	162 days	Mon 5/21/07	Tue 1/1/08							
203		Identification and prioritization of all printed documents from VistA that	225 days	Mon 5/21/07	Fri 3/28/08							
204	▦	Patient name and SSn removed from CPRS progress notes work copy	225 days	Mon 5/21/07	Fri 3/28/08							
205		Discussions with VA procurement pollicy staff regarding acquisition	225 days	Mon 5/21/07	Fri 3/28/08							
206		Implementation of enterprise encryption solution across VA	225 days	Mon 5/21/07	Fri 3/28/08							
207		**Employee Focused**	**225 days**	**Mon 5/21/07**	**Fri 3/28/08**							
208		T&A displays to employee to show last 4 of SSN	225 days	Mon 5/21/07	Fri 3/28/08							
209		PAID separation statistics report so truncated SSN reads as NNNN	225 days	Mon 5/21/07	Fri 3/28/08							
210		Elimination or truncation to last 4 dligits on all internal employee	225 days	Mon 5/21/07	Fri 3/28/08							
211		Mask SSN display on PAID input screens	225 days	Mon 5/21/07	Fri 3/28/08							

ID	ⓘ	Task Name	Duration	Start	Finish	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3
							2007				2008		
212		**Phase Three – Prioritization**	**30 days**	**Tue 12/11/07**	**Mon 1/21/08**								
216		**Phase Four – Short-Term Actions**	**365 days**	**Mon 5/21/07**	**Fri 10/10/08**								
217		**VA-wide Short-term Actions**	**313 days**	**Wed 8/1/07**	**Fri 10/10/08**								
218	▦	Analysis of all systems to determine where SSN used for primary lookup	270 days	Mon 10/1/07	Fri 10/10/08								
219	▦	All exchanges of veteran and employee data/data sharing with other agencies and entities must be identified and analyzed to see if keep or replace	270 days	Mon 10/1/07	Fri 10/10/08								
220	▦	Convert all paper OPFs to eOPFs	305 days	Wed 8/1/07	Tue 9/30/08								
221		Update eCMS based on ECBSO issue guidance on use of SSN on procurement	130 days	Mon 11/5/07	Fri 5/2/08								
222	▦	Assessment of whether all data transmissions are meeting VA security	270 days	Mon 10/1/07	Fri 10/10/08								
223	▦	All printed forms will be reviewed to determine necessity of full or truncated	270 days	Mon 10/1/07	Fri 10/10/08								
224	▦	Review of physical storage of printed end user Security Agreements	270 days	Mon 10/1/07	Fri 10/10/08								
225		**Specific Administration Short-term Actions**	**360 days**	**Mon 5/21/07**	**Fri 10/3/08**								
226		**VHA**	**270 days**	**Mon 5/21/07**	**Fri 5/30/08**								
227		Conduct review and assessment of SSN across VHA info systems and	270 days	Mon 5/21/07	Fri 5/30/08								
228		Identify and review all VHA databases and registries	270 days	Mon 5/21/07	Fri 5/30/08								
229		**VBA**	**360 days**	**Mon 5/21/07**	**Fri 10/3/08**								
230		Reinstitute assignment 8 digit claim number	360 days	Mon 5/21/07	Fri 10/3/08								
231		Utilitize 8 digit corporate participant ID number	360 days	Mon 5/21/07	Fri 10/3/08								
232		Utilize DoD electronic identifier EDIPI	360 days	Mon 5/21/07	Fri 10/3/08								

ID	ℹ	Task Name	Duration	Start	Finish	2007				2008			
						Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3
233		**Phase Five – Long-term Actions**	**1387 days**	**Mon 5/21/07**	**Tue 9/11/12**								
234		**VA-wide Mid and Long-term Actions**	**1292 days**	**Mon 10/1/07**	**Tue 9/11/12**								
235	▦	Substitute for paper SF-50	250 days	Wed 10/1/08	Tue 9/15/09								
236	▦	Review and develop action plan to address corrections based on the system-wide assessment	330 days	Mon 10/1/07	Fri 1/2/09								
237	▦	Analyze where standardized processes or software can be used for one application area to restrict, suppress or eliminate SSN	330 days	Mon 10/1/07	Fri 1/2/09								
238		Replace SSN with UEID for employee records	360 days	Fri 11/16/07	Thu 4/2/09								
239		Finalize approach regarding new unique veteran identifier(s)	260 days	Tue 4/1/08	Mon 3/30/09								
240		Explore feasibility of implementing a single Veteran ID number	120 days	Tue 3/31/09	Mon 9/14/09								
241		Implement single Veteran ID number	360 days	Tue 9/15/09	Mon 1/31/11								
242	▦	Replace PAID with new HR info system	900 days	Wed 4/1/09	Tue 9/11/12								
243		ECBSCO would like agency deviation to FAR so VA can eliminate SSN from all VA	120 days	Mon 5/5/08	Fri 10/17/08								
244		ECBSCO works with OMB to change federal acquisition regulations to eliminate	120 days	Mon 10/20/08	Fri 4/3/09								
245	▦	Review all storage instances of SSN in ROES	330 days	Mon 10/1/07	Fri 1/2/09								
246	▦	Review of contracts with commercial vendors/buisness associations	360 days	Mon 3/3/08	Fri 7/17/09								
247	▦	Get all people assciated with information collection become users fo the ExecVa.	360 days	Mon 3/3/08	Fri 7/17/09								
248		**Special Administration/Staff Office Mid and Long Term Actions**	**900 days**	**Mon 5/21/07**	**Fri 10/29/10**								
249		**VHA**	**900 days**	**Mon 5/21/07**	**Fri 10/29/10**								
250		Prioritize all systems, areas, etc. within VHA that contain or require	330 days	Mon 5/21/07	Fri 8/22/08								
251		Replace present SSN-based identifier for veteran records with last 4 of	500 days	Mon 5/21/07	Fri 4/17/09								
252		Replace truncated last 4 of SSN for veteran records with new identifier	400 days	Mon 4/20/09	Fri 10/29/10								
253		Modify HPS VistA Web to replace full SSN with last 4	500 days	Mon 5/21/07	Fri 4/17/09								
254		Remove SSN from printed pharmacy documents given to patients	500 days	Mon 5/21/07	Fri 4/17/09								
255		Encrypte SSN or move to new identifier for SSN's imbedded in barcodes or magnetic stripes	500 days	Mon 5/21/07	Fri 4/17/09								
256		**OIG**	**500 days**	**Mon 5/21/07**	**Fri 4/17/09**								
257		Implement policy and procedures to virtually eliminate use of SSNs in	500 days	Mon 5/21/07	Fri 4/17/09								
258		**Phase Six – Oversight and Monitoring**	**490 days**	**Fri 5/25/07**	**Thu 4/9/09**								
259	▦	**Bi-weekly updates to the plan**	**483 days**	**Fri 5/25/07**	**Tue 3/31/09**								
309	▦	**Quarterly briefings to VA senior management**	**481 days**	**Fri 5/25/07**	**Fri 3/27/09**								
319	▦	**Submission of FISMA report**	**490 days**	**Fri 5/25/07**	**Thu 4/9/09**								