



UNITED STATES
DEPARTMENT OF VETERANS AFFAIRS

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

April 2008
(Final)

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1. OVERVIEW

The Department of Veterans Affairs (VA) is pleased to provide a mid-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. This update highlights what progress has been made over the past six 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 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. With over 250,000 employees, VA is the second largest Federal Department. 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.

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 year, have highlighted the increased risk to veterans' identity theft because of the widespread use of the SSN.

II. Phase Zero – Project Initiation

In July, 2007, the VA SSN Work Group (SSN-WG), composed of representatives from the three Administrations and many Staff Offices, was created. 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 SSN. Based on general guidance from the SSN-WG, each Administration and appropriate Staff Office continues to develop 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. Appendix A contains VA’s updated version of the complete plan. 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, it quickly became apparent that a more comprehensive inventory was needed. The Veterans Health Administration is taking the lead in developing a more thorough inventory, which will be completed in early 2009. Once this inventory is completed, VA will be able to develop realistic priorities and detailed action plans.

Figure 1: Summary of SSN Plan

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	Timeline								
							2008				2009				
							Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2
1	Phase Zero – Project Initiation	615 days	Thu 5/24/07	Wed 9/30/09	28%		[Gantt bar spanning from Q2 2008 to Q2 2009]								
2	Create SSN Working Group	615 days	Thu 5/24/07	Wed 9/30/09	28%	OIT Privacy and Records Mgt	[Gantt bar spanning from Q2 2008 to Q2 2009]								
111	Phase 1 – Accomplishments through May 2007	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
112	Re Veteran SSN–Unnecessary Use	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
132	Re Employee SSN–Unnecessary Use	16 days	Mon 5/21/07	Mon 6/11/07	100%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
142	Increased SSN Protection When Required	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
154	Phase Two – Create Baseline Inventory and Prioritize Future SSN Reduction Activities	475 days?	Mon 5/21/07	Fri 3/13/09	34%	OIT – Privacy Service	[Gantt bar from Q2 2008 to Q2 2009]								
214	Phase Three – Feasibility of Using New Unique Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	9%	OIT- OED	[Gantt bar from Q2 2008 to Q2 2009]								
215	New Veteran identifiers	498 days	Mon 5/21/07	Wed 4/15/09	45%	OIT- OED	[Gantt bar from Q2 2008 to Q2 2009]								
219	Coordinate with Other Agencies	540 days	Mon 5/21/07	Fri 6/12/09	4%	Various	[Gantt bar from Q2 2008 to Q2 2009]								
237	New Employee Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	16%	HRIS	[Gantt bar from Q2 2008 to Q2 2009]								
243	Phase Four – Current Activities and Initiatives (implementation by June 2008)	367 days	Mon 5/21/07	Tue 10/14/08	83%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
281	Phase Five – Short Term Actions (impementation by December 2008)	420 days	Mon 5/21/07	Fri 12/26/08	19%	Administratons and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
289	Phase Six – Long Term Actions (implementation after March 2009)	1444 days	Mon 5/21/07	Thu 11/29/12	6%	Administrations and Staff Offices	[Gantt bar from Q2 2008 to Q2 2009]								
308	Phase Seven – Briefings, Oversight and Monitoring	433 days	Mon 2/4/08	Wed 9/30/09	7%	OIT-Privacy Service	[Gantt bar from Q2 2008 to Q2 2009]								
309	Submit SSN Reduction Plan with Annual FISMA Report to OMB	392 days	Tue 4/1/08	Wed 9/30/09	0%	OIT-Privacy Service	[Gantt bar from Q2 2008 to Q2 2009]								
312	Periodic briefings to VA senior management	329 days	Mon 2/11/08	Thu 5/14/09	10%	OIT-Privacy Service	[Gantt bar from Q2 2008 to Q2 2009]								
316	Awareness/Outreach to Employees and Veterans	317 days	Mon 2/4/08	Tue 4/21/09	11%	OIT-Privacy Service	[Gantt bar from Q2 2008 to Q2 2009]								

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 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 the accurate identification associated with 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 employee's SSN when collection and use is required by law or regulation or dictated by the mission of the Department. These initiatives, undertaken over the past several years, were completed before OMB published Memorandum 07-16.

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

By law, VA must use the SSN when sharing data with certain government agencies, business partners, and private organizations. It is necessary 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. Until 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. These 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 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 and is currently not implemented across VHA as a construct used for link up to search or and selected patients/beneficiaries. The ICN does not provide any information about the patient or beneficiary, per se. It is used as an identifier trait on the Veterans Identity Card (VIC) and could be adapted as the VA identifier for use across the enterprise given its widespread implementation in VHA to 16 million beneficiaries and patients. There are over five million VA beneficiaries who have been issued these VIC cards to date.
- The current interface between DoD and VA (Defense Enrollment and Eligibility Reporting System (DEERS) – to – Veterans Affairs/DoD Identity Repository (VADIR)) uses a secure, encrypted, dedicated transmission mechanism. All data transfers / matching between DoD and VA utilize unique system level identifiers (DoD Electronic Data Interchange Person Identifier (EDI-PI) and VA ID) and not SSN.¹

¹ The SSN is exchanged with DoD as an identity trait or specifically for matching with DoD or as part of existing data sharing agreements under Memoranda of Understanding with DOD. Some of these are major initiatives. One involves interoperable data sharing (such as the Clinical and Health Data Repository (CHDR) effort; and the other involves Bi-Directional Health Information Exchange (BHIE) with DoD, which provides access between DoD and VA for their longitudinal electronic health records.

- All data transfers containing SSN information are done using encryption or 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 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 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.

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

Phase Two has three separate components: (1) develop the baseline inventory of systems, applications, and forms that identifies current collections and uses of the SSN; (2) review authorities to determine which SSN collections/uses are necessary; and (3) 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 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? Is it 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?

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) is taking the lead to conduct a thorough review and assessment of a “holdings” inventory for all areas and functions within VHA, scheduled to be completed by December 2008. Data collected will then be evaluated to determine business requirements for maintaining full SSN, reducing SSN display, or eliminating use of the SSN. The inventory will cover:

- Applications
- Programs
- Systems
- 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
- All databases and registries used throughout VHA
- External databases/systems

VHA will work closely with the SSN-WG as it finalizes the data collection tool and the definitions for what information will be collected. Both the definitions and the data collection tool will then be modified as needed to collect similar information on SSN holdings in the other two Administrations and the various Staff Offices. The revised VA-wide inventory is scheduled to be completed by the end of January 2009.

B. Define and Review Necessary Uses of the SSN

VA is finalizing its policy guidance regarding the unnecessary use of the SSN within the Department. VA plans “to eliminate the collection and use of SSNs where the collection or use of SSNs is not required by law or mandated by the mission of the Department as set forth by the Secretary.” Specifically, “VA will assemble a board to evaluate requests for new uses of the SSN and to determine whether said uses are required by law or a compelling business need. All determinations of this board shall be binding. Each Administration and key Staff Offices will be requested to nominate board members.”

While data is being collected for the comprehensive inventory, this board will work with the SSN-WG, the Administrations, and the Staff Offices to review existing collections and uses of the SSN. Specifically, the SSN-WG will work with the Administrations and Staff Offices to identify the following: (1) the authority for each collection/use of the SSN; (2) the unnecessary collections/uses of the SSN; (3) the compelling business need to retain the collection/use of the SSN when not required by law; and (4) data sharing with other entities and business partners. Together, this information will form the basis for prioritizing activities and creating short, medium, and long-term action plans.

C. Prioritize Activities and Create Action Plans

Prioritization will be based on the assessment of risk, 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 FY 11 and beyond.

V. Phase Three – Feasibility of Using New Unique Identifiers

VA has begun to explore new ways to identify veterans and employees in its systems and processes.

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 using different identifiers among the various Administrations. Ideally, VA would like to have a single, unique veteran identifier for all VA systems. However,

it may be necessary in the near term to develop a unique VA patient number and unique VA benefit identification number for each veteran, with a correlation between the two maintained in a single authoritative data source.²

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.³ 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 DoD. Also, the anticipated publication of the Health Information Portability and Accountability Act (HIPAA) Individual Identifier Rule could have a bearing on the approach that is implemented, although it is not expected. 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 Identity Management Tiger Team was chartered to develop a department-wide strategy regarding identity and access management for all persons of interest to VA. Final recommendations are due in May 2008.
- An Identity and Access Management Program Office was created in early 2008 that will work to develop new identifiers. The office recently selected a contractor to assess the use of VADIR as an authoritative data source for VA Identity Management. The assessment will include a VA strategy to migrate away from the SSN as a primary identifier. Business needs will be one of the key drivers for the new identifier, with the technology for implementation based on business requirements. The new unique identifier will be structured to be compatible with standards established for a Universal Health Identifier, Personal Identity Verification (PIV), E-Authentication, Office of Personnel Management (OPM), and the DoD Electronic Data Interchange Person Identifier (EDI-PI). This strategy will enable the VA to migrate away from legacy identifiers such as the SSN over time, thus allowing for system changes necessary to directly utilize the new unique identifier and eliminate the need to maintain references.
- 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 continued use of the SSN or use of a replacement identifier with these business partners. These include, but may not be limited to, the following:

² VA is committed to moving away from using the SSN as the primary identifier and authenticator for veterans. However, the SSN will still be collected and used as one of several identifying traits for employees and veterans, especially when computer matching is required. In the long-term, VA hopes to develop and implement an approach for collecting SSN fewer times and having this information contained in the single authoritative data source instead of current process of collecting and maintaining this information in multiple systems.

³ VHA developed a white paper which recommended a single replacement identifier, and the Once VA Registration and Enrollment Board also recommended a single replacement identifier.

- 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. VA plans to reach a decision on what to use for a new veteran identifier(s) by March 2009, but implementation will not begin until 2010 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 will work on developing an interim employee identifier to use until the UEID is ready for deployment. The new VA employee number would be similar in structure to the UEID so that it could quickly be replaced once the UEID is ready. Implementation for the VA interim employee identifier is targeted for the end of December 2008. Meanwhile, there have been several changes made to Personnel and Accounting Integrated Data (PAID) to improve the protection of the SSN when it is used. For example, masking part of the SSN on screens and when printing.

VI. Phase Four – Current Activities and Initiatives

There are numerous current activities and initiatives underway regarding the reduction and elimination of the SSN at VA. These should be completed by June 2008. Most of these involve the removal of SSNs off of 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. Most of these activities are veteran-focused; however, a few are employee-focused.

VII. Phase Five – Short-Term Actions

There are a few more activities that will be completed by December 2008. Half are veteran-focused and the other half are employee-focused.

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 the end of January 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 possible (with the goal of collecting once and using many times), approval of new veteran identifier(s), and its implementation.

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. 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. 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 the quarterly and annual VA FISMA reports.

A new section has been added to the briefing section of this plan. VA has developed an SSN Awareness campaign, which was kicked off on March 25, 2008. The goals of this campaign are twofold: (1) to reach the more than 250,000 VA employees and let them know about the SSN reduction initiative; and (2) to let veterans know that we are committed to protecting their personal information, including their SSN.

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 quite heavily as a unique identifier at VA. There are many system changes needed before VA can implement new unique identifiers that are not based on the SSN. 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 reliable unique identifier without that identifier eventually causing 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. Much education and retraining must take place to break the habit of using the SSN as the primary way to verify identity.

XI. 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, or to fulfill 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.

Appendix A – SSN Plan (as of 4-20-08)

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008 Qtr 1
1	Phase Zero – Project Initiation	615 days	Thu 5/24/07	Wed 9/30/09	28%		
2	Create SSN Working Group	615 days	Thu 5/24/07	Wed 9/30/09	28%	OT Privacy and Records Mgt	
3	Draft memo	0 days	Mbn 7/9/07	Mbn 7/9/07	100%	OT Privacy and Records Mgt	
4	Select members	0 days	Mbn 7/16/07	Mbn 7/16/07	100%	Administrations and Staff Offices	
5	Kickoff meeting	0 days	Tue 9/18/07	Tue 9/18/07	100%	OT 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	481 days	Thu 5/24/07	Thu 3/26/09	46%	OT Privacy and Records Mgt	
106	Review and Approve Future Plans	523 days	Mbn 10/1/07	Wed 9/30/09	25%	Administrations and Staff Offices	
107	April 2008 review	131 days	Mbn 10/1/07	Mbn 3/31/08	100%	OT Privacy and Records Mgt	
108	FY 2008 FISMA Report (September 2008)	131 days	Tue 4/1/08	Tue 9/30/08	0%	SSN Working Group	
109	March 2009 review	131 days	Wed 10/1/08	Wed 4/1/09	0%	OT Privacy and Records Mgt	
110	FY 2009 FISMA Report (September 2009)	131 days	Wed 4/1/09	Wed 9/30/09	0%	SSN Working Group	
111	Phase 1 – Accomplishments through May 2007	16 days	Mbn 5/21/07	Mbn 6/11/07	100%	Administrations and Staff Offices	
112	Re Veteran SSN–Unnecessary Use	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	Administrations and Staff Offices	
113	New VIC cards no longer display SSN	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
114	SSN Removed from enrollment notification/welcome letters	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
115	SSN no longer on income verification-related correspondence	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
116	Consolidated Mail Outpatient Pharmacy (CMOP) eliminated SSN on prescription bottles and mailing labels	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
117	SSN removed from VHA Volunteer database	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
118	Vista no longer prints SSN on communication mailings	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
119	SSN removed from all monthly co-payment billing statements	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
120	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	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
121	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	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	

ID		Task Name	Duration	Start	Finish	% Complete	Resource Names	2008 Qtr 1
122		SSN removed from health care authorization cards for CHAMPVA, SB, and Children of Women Vietnam Veterans Health Care Program (CWVV)	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
123		SSN removed from Customer Contact Letters	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
124		VHA scrambled or truncated SSN when needed for verification; SSN hidden during use	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
125		Updated and strengthened procedures for handling changes to address and direct deposit information	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
126		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	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
127		Only last 4 of SSN on BDN generated aware notification letters from Education Service	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
128		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	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
129		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	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
130		VR&E Service limits contractor access to Counseling -Evaluation-Rehabilitation (CER) folders	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
131		Veterans Insurance Claims Tracking and Response System (VICTARS) modified so SSN removed from Designation of Beneficiary Form	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VBA	
132		All PII stripped from assignment emails on the ExecVA system	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	Office of Secretary	
133		Re Employee SSN- Unnecessary Use	16 days	Mbn 5/21/07	Mbn 6/11/07	100%	Administrations and Staff Offices	
134		SSNs have been eliminated or truncated in most Personnel and Accounting Integrated Data (PAID) system human resources (HR) related outputs	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	OHRM	
135		SSN no longer appears on all routine email correspondence from Office of Human Resources Management	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	OHRM	
136		HR data must be encrypted before sent in electronic form	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	Administrations and Staff Offices	
137		SSN truncated to last 4 digits on all bi-weekly pay statements	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	OHRM	
138		Time and Attendance (T&A) displays to employee to show last 4 of SSN	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	HRIS	
139		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	Mbn 6/11/07	Mbn 6/11/07	100%	HRIS	
140		SSN scrambled or reduced to last 4 digits when used within VHA research, administrative planning, and HR	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	VHA	
141		SSN removed from all NCA job related correspondence	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	NCA	
142		SSN is not used on any ID badges/materials	0 days	Mbn 5/21/07	Mbn 5/21/07	100%	Administrations and Staff Offices	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008 Qtr 1
143	Increased SSN Protection When SSN Is Required	0 days	Mon 5/21/07	Mon 5/21/07	100%	Administrations and Staff Offices	
144	ICN used as identifier in VHA systems	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
145	Encryption and dedicated transmissions for DoD-VA interface	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
146	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	
147	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	
148	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	
149	Eliminated use of unencrypted thumb drives across the Department	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
150	Truncation of SSN on mail-in supply reorder cards	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIT	
151	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	
152	Elimination of SSN from VHA audiogram-related application	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
153	OIG issued comprehensive end user policy on protection of PII	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIG	
154	OIG implemented an enterprise encryption solution across OIG	0 days	Mon 5/21/07	Mon 5/21/07	100%	OIG	
155	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	
156	Phase Two – Create Baseline Inventory and Prioritize Future SSN Reduction Activities	475 days?	Mon 5/21/07	Fri 3/13/09	34%	OIT – Privacy Service	
157	Initial Baseline Inventory of SSN Uses	128 days	Mon 5/21/07	Wed 11/14/07	100%	OIT Privacy Service	
158	Review Office of General Counsel data call April 2006	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
159	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	
160	Review Privacy Impact Assessments (PIAs)	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
161	Review of OMB authorized forms	60 days	Mon 7/30/07	Fri 10/19/07	100%	OIT Privacy Service	Privacy
162	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	Privacy
163	Review of Enterprise Architecture's Baseline inventory	10 days	Mon 9/17/07	Fri 9/28/07	100%	OIT Privacy Service	
164	Review of VistA uses of SSN (prepared in 2006)	60 days	Mon 5/21/07	Fri 8/10/07	100%	OIT Privacy Service	
165	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	
166	Initial Inventory Complete	0 days	Thu 11/1/07	Thu 11/1/07	100%	OIT Privacy Service	/1
167	Initial review of authorities identified in baseline inventory	128 days	Mon 5/21/07	Wed 11/14/07	100%	OIT Privacy Service	TPrivacy

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008
							Qtr 1
168	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	17%	Administrations and Staff Offices	
169	VHA Baseline Activities	295 days	Fri 12/14/07	Thu 1/29/09	29%	VHA CI HDI	
170	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 CI HDI	12/14
171	Finalize VHA SSN Working Group Charter	55 days	Fri 12/14/07	Thu 2/28/08	100%	VHA CI HDI	
172	Develop Processes for Evaluating New/Changes to SSN	120 days	Fri 2/29/08	Thu 8/14/08	5%	VHA SSN Working Group	
173	VHA Baseline Inventory by Category	250 days	Fri 1/4/08	Thu 12/18/08	29%	VHA SSN Inventory Subgroup	
174	Develop Categories	41 days	Fri 1/4/08	Fri 2/29/08	100%	VHA SSN Inventory Subgroup	
175	Identify Sources	120 days	Fri 1/4/08	Thu 6/19/08	50%	VHA SSN Inventory Subgroup	
176	Identify Business Owners	120 days	Fri 1/4/08	Thu 6/19/08	50%	VHA SSN Inventory Subgroup	
177	Review VA Baseline Inventory Efforts from Other	30 days	Fri 6/20/08	Thu 7/31/08	0%	VHA SSN Inventory Subgroup	
178	Stand Up Database for Inventory Collection	120 days	Fri 1/4/08	Thu 6/19/08	50%	VHA SSN Inventory Subgroup	
179	Develop Collection Tool	120 days	Fri 1/4/08	Thu 6/19/08	50%	VHA SSN Inventory Subgroup	
180	Obtain VHA Approval for Data Collection Effort Across	120 days	Fri 2/29/08	Thu 8/14/08	25%	VHA SSN Inventory Subgroup	
181	Develop Guidance for Data Collection	30 days	Fri 6/20/08	Thu 7/31/08	0%	VHA SSN Inventory Subgroup	
182	Gather VHA Metadata	90 days	Fri 8/15/08	Thu 12/18/08	0%	VHA Business Owner	
183	Identify Authority for Use	90 days	Fri 8/15/08	Thu 12/18/08	0%	VHA Business Owner	
184	Identify Business Need to Retain Full SSN	90 days	Fri 8/15/08	Thu 12/18/08	0%	VHA Business Owner	
185	Identify Unnecessary Use	90 days	Fri 8/15/08	Thu 12/18/08	0%	VHA Business Owner	
186	Identify Data Sharing with Other	90 days	Fri 8/15/08	Thu 12/18/08	0%	VHA Business Owner	
187	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	
188	VHA Inventory Complete	0 days	Thu 1/29/09	Thu 1/29/09	0%	VHA SSN Working Group	
189	Have Rest of VA Use VHA Inventory Repository	240 days	Mon 3/3/08	Fri 1/30/09	0%	OIT-Privacy Service	
190	Review VHA Categories and Modify if Necessary	60 days	Mon 3/3/08	Fri 5/23/08	0%	Other Administrations and Staff Offices	
191	Review Data Collection Tool and Modify if Necessary	30 days	Fri 6/20/08	Thu 7/31/08	0%	Other Administrations and Staff Offices	
192	Obtain Approval for Data Collection Across VBA, NCA, and Staff Offices	120 days	Mon 3/3/08	Fri 8/15/08	0%	OIT-Privacy Service	
193	Review Guidance for Data Collection and Modify if	10 days	Fri 8/1/08	Thu 8/14/08	0%	OIT-Privacy Service	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008
							Qtr 1
194	Gather Metadata from VBA, NCA, and Staff Offices	90 days	Mon 8/18/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
195	Identify Authority for Use	90 days	Mon 8/18/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
196	Identify Business Need to Retain Full SSN	90 days	Mon 8/18/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
197	Identify Unnecessary Use	90 days	Mon 8/18/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
198	Identify Data Sharing with Other Entities/Business Partners	90 days	Mon 8/18/08	Fri 12/19/08	0%	Administration and Staff Office Business Owners	
199	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	
200	Non-VHA inventory Complete	0 days	Fri 1/30/09	Fri 1/30/09	0%	OIT-Privacy Service	
201	VA-wide Inventory Complete	0 days	Fri 1/30/09	Fri 1/30/09	0%	OIT-Privacy Service	
202	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	
203	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	
204	Clarify and publish acceptable list of SSN uses	100 days	Fri 8/1/08	Thu 12/18/08	0%	OIT Privacy Service and OGC	
205	Establish acceptable SSN use group	30 days	Fri 12/19/08	Thu 1/29/09	0%	OIT Privacy Service	
206	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	
207	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	
208	Prioritize Future SSN Reduction Activities Based on Review of Completed	30 days	Mon 2/2/09	Fri 3/13/09	0%	Administrations and Staff Offices	
209	VHA to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	VHA SSN Working Group	
210	VBA to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	VBA	
211	NCA and Staff Offices to prioritize activities	30 days	Mon 2/2/09	Fri 3/13/09	0%	NCA and Staff Offices	
212	Create Short and Long Range Action Plans	31 days?	Fri 1/30/09	Fri 3/13/09	0%	Administrations and Staff Offices	
213	VHA creates plans	30 days	Fri 1/30/09	Thu 3/12/09	0%	VHA SSN Working Group	
214	VBA creates plans	1 day?	Mon 2/2/09	Mon 2/2/09	0%	VBA	
215	NCA and Staff Offices create plans	30 days	Mon 2/2/09	Fri 3/13/09	0%	NCA and Staff Offices	
216	Phase Three – Feasibility of Using New Unique Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	9%	OIT-OED	
217	New Veteran identifiers	498 days	Mon 5/21/07	Wed 4/15/09	45%	OIT-OED	
218	Initial exploration completed 2006	0 days	Mon 5/21/07	Mon 5/21/07	100%	VHA	
219	Identity Management Tiger Team Develops Report	245 days	Mon 5/21/07	Fri 4/25/08	95%	OIT-OED	
220	Identity Management and Access Management Program Office works to develop new identifiers	300 days	Thu 2/21/08	Wed 4/15/09	4%	OIT-OED	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008 Qtr 1
221	Coordinate with Other Agencies	540 days	Mon 5/21/07	Fri 6/12/09	4%	Various	
222	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	
223	Department of Defense	480 days	Mon 5/21/07	Fri 3/20/09	0%	OED,VBA and others	
224	Social Security Administration	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
225	Department of the Treasury	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
226	Department of Labor	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
227	Public Health Service	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
228	Centers for Disease Control and Pr	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
229	Centers for Medicaid and Medicare	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
230	Defense Finance and Accounting Service	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
231	U.S. Coast Guard	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
232	Office of Servicemembers Group Life Insurance	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
233	State Rehabilitation Agencies	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
234	Public and Privacy Educational Institutions	480 days	Mon 5/21/07	Fri 3/20/09	0%	TBD	
235	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	
236	Review E-Government Initiatives	218 days	Mbn 3/3/08	Wed 12/31/08	5%	OIT	
237	Participate on Interagency Best Practices Collaborative	470 days	Thu 6/14/07	Wed 4/1/09	20%	OIT Privacy and Records Mgt	
238	Participate in High Volume PII Subcommittee of Interagency Best Practices Collaborative	400 days	Wed 9/12/07	Tue 3/24/09	35%	OIT Privacy and Records Mgt	
239	New Employee Identifiers	1200 days	Mon 7/3/06	Fri 2/4/11	16%	HRIS	
240	Participate on Office of Personnel Management (OPM) task force to create a Federal unique employee identification number (UEID)	1200 days	Mbn 7/3/06	Fri 2/4/11	32%	HRIS	
241	OPM issued First Concept of Operations for UEID	0 days	Wed 1/9/08	Wed 1/9/08	100%	OPM	1/9
242	OPM issues final guidance on UEID	800 days	Wed 1/9/08	Tue 2/1/11	0%	OPM	
243	VA develops interim employee identifier while waiting for final guidance on OPMs UEID	270 days	Wed 1/9/08	Tue 1/20/09	0%	HRIS	
244	VA implements interim employee identifier, contingent on all VA being converted to ePayroll (VA migration to the Defense Finance and Accounting Service (DFAS) is scheduled for completion April 2009)	180 days	Wed 1/21/09	Tue 9/29/09	0%	HRIS	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008
							Qtr 1
245	Phase Four – Current Activities and Initiatives (implementation by June 2008)	367 days	Mbn 5/21/07	Tue 10/14/08	87%	Administrations and Staff Offices	
246	Comprehensive policy on protection of PII	275 days	Mbn 5/21/07	Fri 6/6/08	79%	OIT Privacy Service	
247	Update VA Directive 6502, Enterprise Privacy Program	275 days	Mbn 5/21/07	Fri 6/6/08	75%	OIT Privacy Service	
248	Create VA Directive 6507, Use of SSN Numbers	275 days	Mbn 5/21/07	Fri 6/6/08	50%	OIT Privacy Service	
249	Create VA Directive 6371, Destruction of Temporary Paper Records	275 days	Mbn 5/21/07	Fri 6/6/08	90%	OIT Records Management Service	
250	Create VA Directive 6609, Mailing of Personally Identifiable and Sensitive Information	125 days	Mbn 5/21/07	Fri 11/9/07	100%	OIT Records Management Service	Records
251	Develop draft internal OIG policy to virtually eliminate use of SSNs in larger data sets used in OIG oversight work	160 days	Mbn 5/21/07	Fri 12/28/07	100%	OIG	OIG
252	Review forms and websites collecting/using SSNs (data call completed Summer 2007)	96 days	Mbn 5/21/07	Mbn 10/1/07	100%	Administrations and Staff Offices	Administrations
253	Review all system of records notices (SORNs) to identify all systems that use SSN	131 days	Mbn 5/21/07	Mbn 12/31/07	100%	Administrations and Staff Offices	Admini
254	Review of printed forms for necessity of full or truncated SSN (DALC/ROES)	200 days	Mbn 5/21/07	Fri 2/22/08	100%	OED	C
255	Truncate the SSN on Education Service PC Generate Letters to last four of SSN	125 days	Mbn 5/21/07	Sat 11/10/07	100%	VBA	A
256	Remove the SSN from the Insurance Service's Inforce RPO document	225 days	Mbn 5/21/07	Fri 3/28/08	100%	VBA	
257	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	Mbn 5/21/07	Wed 10/31/07	100%	OED	D
258	Identify all uses of SSN in VistA (including inputs and outputs)	100 days	Fri 2/1/08	Thu 6/19/08	40%	VHA SSN Working Group	
259	Discussions with VA procurement policy staff regarding acquisition regulations that reference SSN (ECBSO)	140 days	Mbn 5/21/07	Fri 11/30/07	100%	OED	OED
260	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	Mbn 5/21/07	Mbn 12/31/07	100%	OED	OED
261	Implementation of enterprise encryption solution across VA that encrypts hard drives, email messages, and removable storage devices across VA	225 days	Mbn 5/21/07	Fri 3/28/08	100%	OIT	
262	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	
263	Replace use of truncated SSN (last four) in username for VA's Learning Management System (LMS)	96 days	Mbn 5/21/07	Mbn 10/1/07	100%	OED	
264	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	Mbn 5/21/07	Thu 8/30/07	100%	OED	

ID		Task Name	Duration	Start	Finish	% Complete	Resource Names	2008 Qtr 1
265		Review of physical storage of printed end user Security Agreements (DALC/ROES)	41 days	Mbn 11/5/07	Mbn 12/31/07	100%	OED	OED
266		Truncation of SSN on end user Security Agreements (DALC/ROES)	74 days	Mbn 5/21/07	Thu 8/30/07	100%	OED	
267		Review of storage instances of full SSN in database files (DALC/ROES)	200 days	Mbn 5/21/07	Fri 2/22/08	100%	OED	
268		Access to DAL/ROES records controlled by access assignments made on need to know basis	40 days	Mbn 5/21/07	Fri 7/13/07	100%	OED	
269		Strong passwords are required for access to systems/applications (DALC/ROES)	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
270		Truncation of SSN on hard copy reports and forms printed from ROES and DALC production system	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
271		Hashing of SSN in transmission between VA medical centers (VAMC) and DALC	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
272		Hashing of SSN in transmission between E-authentication infrastructure and the DALC	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
273		SSN truncated to last 4 on Electronic Data Interchange (EDI) transactions (DALC/ROES)	74 days	Mbn 5/21/07	Thu 8/30/07	100%	OED	
274		Servers and media containing individual records are located in a secure location (DALC/ROES)	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
275		Portable electronic storage media are encrypted (DALC/ROES)	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
276		Review of occurrences of SSN in letters mailed to individual veterans (DALC/ROES)	75 days	Mbn 5/21/07	Fri 8/31/07	100%	OED	
277		Review of SSN usage in interfaces with other VA systems (DALC/ROES)	82 days	Tue 1/8/08	Wed 4/30/08	75%	OED	
278		Mask SSN display on PAID input screens	270 days	Mbn 5/21/07	Fri 5/30/08	80%	HRIS	
279		Review of SSN display in ROES and internal DALC applications	82 days	Tue 1/8/08	Wed 4/30/08	75%	OED	
280		Review of contracts with commercial vendors/business associates for compliance with overall plan to eliminate unnecessary use of SSNs (DALC/ROES)	131 days	Mbn 12/3/07	Mbn 6/2/08	60%	OED	
281		Phase Five – Short Term Actions (implementation by December 2008)	420 days	Mbn 5/21/07	Fri 12/26/08	19%	Administrations and Staff Offices	
282		Convert all paper Official Personnel Folders (OPFs) to Electronic OPFs (eOPFs)	305 days	Wed 8/1/07	Tue 9/30/08	55%	HRIS	
283		Final internal OIG policy to virtually eliminate use of SSNs in larger data sets used for OIG oversight	200 days	Mbn 12/31/07	Fri 10/3/08	33%	OIG	
284		Assessment of whether all data transmissions are meeting VA security requirements	270 days	Mbn 10/1/07	Fri 10/10/08	0%	OIT R&E	
285		Remove partial SSN from user identification number for E-travel system	215 days	Mbn 3/3/08	Fri 12/26/08	10%	Financial Services Center	
286		All printed forms will be reviewed to determine necessity of full or truncated SSN	270 days	Mbn 10/1/07	Fri 10/10/08	0%	OIT-Privacy Service	
287		Identify and review all VHA databases and registries (with inputs and outputs)	300 days	Mbn 5/21/07	Fri 10/3/08	35%	VHA SSN Working Group and VHA SSN Inventory Subgroup	
288		VBA assessment on feasibility of using a new identifier	360 days	Mbn 5/21/07	Fri 10/3/08	0%	VBA	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008
							Qtr 1
289	Phase Six – Long Term Actions (implementation after March 2009)	1444 days	Mon 5/21/07	Thu 11/29/12	6%	Administrations and Staff Offices	
290	Regular meetings of acceptable SSN use group	800 days	Fri 1/30/09	Thu 2/23/12	0%	OIT Privacy Service	
291	Ensure that a single entity review and approve all proposed uses of the SSN in new systems and modifications to existing systems	800 days	Fri 1/30/09	Thu 2/23/12	0%	OIT Privacy Service	
292	Clarify and confirm this entity	30 days	Fri 1/30/09	Thu 3/12/09	0%	OIT Privacy Service	
293	Regular meetings of the group (as needed)	800 days	Fri 1/30/09	Thu 2/23/12	0%	OIT Privacy Service	
294	Substitute for paper SF-50	512 days	Mbn 10/1/07	Tue 9/15/09	33%	HRIS	
295	OPM issues final guidance on UEID	800 days	Wed 1/9/08	Tue 2/1/11	0%	OPM	
296	OPM UEID ready for roll out	0 days	Tue 2/1/11	Tue 2/1/11	0%	OPM	
297	VA implements OPM UEID employee identifier	175 days	Wed 2/2/11	Tue 10/4/11	0%	HRIS	
298	Update all SORNS	780 days	Tue 1/1/08	Mbn 12/27/10	15%	Administrations and Staff Offices	
299	Based on VA-wide inventory, work to remove SSN from data collection forms and websites	180 days	Mbn 2/2/09	Fri 10/9/09	0%	Records Management Service	
300	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	Mbn 5/21/07	Tue 6/30/09	50%	VBA	
301	Work with Administrations and Staff Offices to approve new identifiers to replace SSN (based on results from new identifier feasibility tasks)	260 days	Thu 4/16/09	Wed 4/14/10	0%	OED	
302	Implement new identifiers	500 days	Thu 4/15/10	Wed 3/14/12	0%	System Owners	
303	Regular meetings on continued SSN use when use is not mandated	1000 days	Fri 1/30/09	Thu 11/29/12	0%	OIT – Privacy Service and Records Management Service	
304	Replace PAID with new human resources information system	900 days	Wed 4/1/09	Tue 9/11/12	0%	HRIS	
305	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	Mbn 5/21/07	Fri 4/17/09	0%	OED	
306	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	Mbn 3/3/08	Fri 7/17/09	0%	OED	
307	Encrypted SSN or move to new identifier for SSNs imbedded in barcodes or magnetic stripes	576 days	Fri 2/1/08	Thu 5/27/10	0%	VHA SSN Working Group and VHA SSN Inventory Subgroup	

ID	Task Name	Duration	Start	Finish	% Complete	Resource Names	2008
							Qtr 1
308	Phase Seven – Briefings, Oversight and Monitoring	433 days	Mon 2/4/08	Wed 9/30/09	7%	OIT-Privacy Service	
309	Submit SSN Reduction Plan with Annual FISMA Report to OMB	392 days	Tue 4/1/08	Wed 9/30/09	0%	OIT-Privacy Service	
310	FY 2008 FISMA Report (September 2008)	131 days	Tue 4/1/08	Tue 9/30/08	0%	SSN Working Group	
311	FY 2009 FISMA Report (September 2009)	131 days	Wed 4/1/09	Wed 9/30/09	0%	SSN Working Group	
312	Periodic briefings to VA senior management	329 days	Mon 2/11/08	Thu 5/14/09	10%	OIT-Privacy Service	
313	Briefing materials prepared for Secretary	0 days	Mon 2/11/08	Mon 2/11/08	100%	OIT-Privacy Service	2
314	Memo to Senior Management on Status of Plan (May 2008)	50 days	Fri 2/29/08	Thu 5/8/08	62%	OIT-Privacy Service	
315	Future briefings	265 days	Fri 5/9/08	Thu 5/14/09	0%	OIT-Privacy Service	
316	Awareness/Outreach to Employees and Veterans	317 days	Mon 2/4/08	Tue 4/21/09	11%	OIT-Privacy Service	
317	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	
318	Placement of SSN Plan on Privacy Service webpages	0 days	Mon 2/11/08	Mon 2/11/08	100%	OIT-Privacy Service	2
319	SSN Reduction Awareness Campaign Kick off	1 day	Tue 3/25/08	Tue 3/25/08	100%	OIT-Privacy Service	
320	Future SSN Reduction Awareness Efforts	280 days	Wed 3/26/08	Tue 4/21/09	0%	OIT-Privacy Service	