Department of the Treasury
Social Security Number (SSN) Unnecessary Use Elimination Plan

1. **Background**. On December 5, 2006, the Office of Management and Budget (OMB) cited a recommendation from the Identity Theft Task Force (ITTF)[1] suggested that all federal agencies be required to "review the use of SSNs to determine whether such use can be eliminated, restricted, or concealed in agency business processes, systems, and electronic (and paper) forms." Acting on the ITTF recommendation, OMB directed agencies to complete an SSN Use Survey and return the results to OMB by January 16, 2007.

   Subsequently, on April 23, 2007, OMB requested agency Chief Information Officers (CIO) provide information concerning the protection of personally identifiable information (PII), specifically for loans and grants. The message also requested "a certification from the Senior Agency Official for Privacy (SAOP) that a review of your agency's use of SSNs has been completed, and that the agency has a plan in place for elimination of unnecessary use of social security numbers and estimated date of completion." Under the authority of the Assistant Secretary for Management and Chief Financial Officer (ASM/CFO), who serves as the SAOP, the Office of the CIO responded to OMB's request regarding the loan and grant activity and certified that the SSN survey was conducted.

   OMB Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information,* issued on May 22, 2007, formally requested agencies to eliminate unnecessary use of SSNs. OMB requested agencies to develop a plan within 120 days that included elimination of unnecessary collection and use of SSNs within 18 months. This plan serves to outline the steps involved in eliminating the "unnecessary use" of SSNs within the Department.

2. **Scope**. Currently, there are 13 bureaus and offices in the Department. When bureaus and offices responded to OMB's quarterly update of the privacy section of the Fiscal Year (FY) 2006 Federal Information Security Management Act (FISMA) Report on March 1, 2007, 406 systems were identified as systems which contain Federally-owned information in identifiable form. This *systems* number addresses one of three items in the OMB request which also covered all agency *processes* and electronic (and paper) *forms*. The number also excludes the Department's 1,200 OMB-approved information collection forms under the Paperwork Reduction Act (PRA).

   The Department's mission and functions are complex and diverse, and the scope of the effort to eliminate the "unnecessary use" of SSNs would extend well beyond the boundaries of the Department. For example, the Internal Revenue Service (IRS) has multiple interfaces with the Social Security Administration (SSA) and with every

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[1] Memorandum from the Identity Theft Task Force, *Identity Theft Related Data Security Breach Notification Guidance*, September 19, 2006

business entity in the United States from large corporations to small businesses. The Financial Management Service produces and mails benefit checks for the SSA and IRS. The Bureau of the Public Debt sells both marketable and non-marketable securities to millions of Americans. In all of these examples the SSN is a major data element.

When considering statutes, e.g., *Bank Secrecy Act* (BSA) and *U.S. Patriot Act,* that require SSNs, efforts to request statutory and regulatory changes would extend beyond the 18-month period. The Financial Crimes Enforcement Network (FinCEN) has 13 OMB-approved information collections (forms) under BSA. The forms are used by and/or the information is shared with the Office of the Comptroller of the Currency, Office of Thrift Supervision, Federal Deposit Insurance Corporation, the National Credit Union Administration, the Federal Bureau of Investigation, IRS, banking institutions, and other law enforcement agencies.

Given the complexity and breadth of this undertaking, bureaus with sufficient justifications for being unable to meet the requirement to eliminate the unnecessary collection and use of SSNs within 18 months will provide implementation plans with timelines extending beyond the 18 month requirement.

3. **Tasks for the Elimination of Unnecessary Use of SSNs**. The effort to eliminate the unnecessary use of SSNs will require a well-conceived and methodical approach if the effort is to be successful. The following is a list of the major tasks, some conducted concurrently, which would need to be executed in order to meet the OMB mandate. There will be no new funding for this work.

   A. Phase I, Bounding the Problem. (Complete November 1, 2007)

      1. The ASM/CFO will solicit from each bureau its report to:
         a. Confirm the SSN Use Survey data compiled last February is current and complete. This should include a scrub of existing databases for any SSN data not already identified.
         b. For every SSN use, either confirm and justify the business need to continue using SSN data or identify the use as one to be eliminated.

      2. Treasury CIO will share lessons learned with the bureaus.
      3. Treasury CIO will coordinate with the bureau designated points of contact for these plans.
      4. Treasury CIO will compile bureau reports on completion of Phase I.

   B. Phase II, Bureau Plans and Timelines to Protect SSN Information, or Eliminate Unnecessary SSN Use. (Complete December 1, 2007)

      1. ASM/CFO will solicit from each bureau its plan and milestones:
         a. For each SSN use identified in Phase I as needed by the bureau to achieve business results, the processes in place, or planned, to protect

SSN information from unauthorized disclosure.
- b. For each SSN use identified in Phase I as not required by the bureau to achieve business results, the migration and timeline needed to eliminate the SSN use.
- c. Note: Bureau implementation plans should be completed by November 29, 2007.
2. Treasury CIO will share lessons learned with the bureaus.
3. Treasury CIO will coordinate with the bureau designated points of contact for these plans.
4. Treasury CIO will compile bureau reports on completion of Phase II.

C. <u>Phase III, Implementation of Phase II Planning</u>. (Complete March 20, 2009)

1. Each bureau will implement the planning completed in Phase II.
2. At the end of this period, the ASM/CFO will solicit from each bureau a status report on:
    - a. Actions completed.
    - b. Actions pending and timeline to completion.
3. Treasury CIO will share lessons learned with the bureaus.
4. Treasury CIO will coordinate with the bureau designated points of contact for these reports.
5. Treasury CIO will compile bureau reports on completion of Phase III.

D. <u>Phase IV, Verification and Maintenance (at the 12 month point and annually thereafter).</u>

1. Each bureau will review SSN use and verify that continued use is required to achieve business results.
    - a. For any SSN use no longer needed, the bureau will identify this issue and provide plan/timeline to eliminate usage.
2. Each bureau will review and verify adequacy of SSN data protection against unauthorized disclosure.
3. Each bureau will scrub existing databases for SSN information not previously identified.
4. Treasury CIO will compile these annual bureau reports.