

FISMA #20 Reduce use of Social Security Number collection Policy/Procedure

Clients - Change how the Social Security Number Collection

When the time comes that the client will receive some kind of payment from ONHIR the Chief Financial Officer (CFO) will retrieve the Social Security number from the client's Housing Specialist to enter the number in the client's electronic vendor record (RC.0800). In an effort to protect the client's social security number the vendor file (RC.0800) has been encrypted. The clients Social Security number will only be used so the CFO can produce 1099 tax forms. When the clients' electronic case file is closed (usually after 2 years in PM status) and the vendor record is inactive (usually 6 months of no activity) the Social Security number will be removed from the vendor record. If the client's case is re-opened, the accounting department can repeat the above steps to reenter the Social Security number.

Employees - SS#

The Personnel Office and the office of the CFO will need to collect the employees Social Security number for the performance of their duties. As stated above the Social Security number field has been encrypted.

Contractors - SS#

The office of the CFO will need to collect the contractors EIN/SS# for tax purposes. As stated above the PII information is encrypted.

REDUCE THE USE

The following steps have been completed. Diane Pratte, CIO September 24, 2008

- 1, Wrote a program to zero out the SS# of all client and member electronic records, files RC.0300 and RC.0305.
- 2, Wrote a program to run AFTER CLT306 to delete banking records (RC.0801) of closed clients if the vendor record is already inactive(acrec = I). CLT306 runs monthly to inactivate vendor records.
- 3, Changed the Case Closer Program (RC309-manual and RC610 automatic) to zero out the clients SS# when the case is closed. All member records are also cleaned up.
- 4, Changed the Application Program (RC312) to not accept Social Security Numbers.
- 5, Client JUA file (RC.0390) had the SS# - this was cleaned up by a DFU program.

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The following step has been completed. July 2018

6, We have transferred 99% of our client physical files to the Riverside Facility in Perris, CA. thereby reducing access to the SS#.

PII Data Extraction

Office of Personnel Management (OPM) yearly request employee SS# and email address for a survey. The CIO creates a file with this information – Uses OPM's secure sign in to upload the file. The file the CIO created is then electronically shredded.

Government Accountability Office (GAO) Audit Request

During audits by GAO the CIO will create customized reports with requested data. Sometimes the requested reports will be FedEx to the GAO office or the reports may be securely emailed.

Freedom of Information Act (FOIA)

The vast majority of our FOIA requests contain Personally Identifiable Information (PII), so for the privacy of our clients the requested reports will not be shared with the public.