

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

Clients - Change how the Social Security Number Collection

The clients SS# will still be included on the Office of Navajo and Hopi Indian Relocation (ONHIR) written application. The clients SS# will then be kept in the physical case file. When the time comes that the client will receive some kind of payment from ONHIR the Chief Financial Officer (CFO) will retrieve the SS# from the client's case file to enter the number in the clients electronic vendor record (RC.0800). The clients SS# 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 SS# will be removed from the vendor record. If the client's case is reopened, the accounting department can repeat the above steps to reenter the SS#.

Employees - SS#

The Personnel Office and the office of the CFO will need to collect the employees SS# for the performance of their duties.

Contractors - SS#

The office of the CFO will need to collect the contractors EIN/SS# for tax purposes.

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 DFU program.

The following step has been completed. July 2018

- 6, We have transferred 99% of our client physical files to the records center in Laguna Nigel, CA. thereby reducing access to the SS#.