STATEMENT OF

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AND

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Good afternoon, Chairman Johnson, Chairman Hurd, Ranking Member Larson, Ranking Member Kelly, and distinguished members of the Subcommittees. Thank you for providing me with this opportunity to participate in your joint hearing on "Government Use of Social Security Numbers," and to discuss the actions that VA is taking to find ways to eliminate or reduce the use of Social Security Numbers (SSN) from VA's information systems.

Overview

VA's revised SSN Reduction Plan clarified 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.

VA's mission is to serve America's Veterans and their families with dignity and compassion, to be their principal advocate, and to ensure that they receive the medical care, benefits, social support, and lasting memorials for which they are eligible because of their service to our Nation. VA is the second largest Federal Department and as advocates for Veterans and their families, VA employees are committed to providing world-class services in the provision of benefits.

VA is composed of a Central Office, located in Washington, DC, and field facilities throughout the United States, American Samoa, Guam, Puerto Rico, the Philippines, and the Virgin Islands. VA has three major line organizations: the Veterans Health Administration (VHA), the Veterans Benefits Administration (VBA), and the National Cemetery Administration (NCA).

VA's Administrations have very different missions – health, benefits, and memorial affairs. To complete these missions, VA needs to collect and maintain a tremendous store of personal information about Veterans and their beneficiaries. The Department interfaces with many other Federal agencies including, but not limited to, the Department of Defense (DoD), the Social Security Administration (SSA), the Internal Revenue Service (IRS) under the Department of the Treasury, and the Department of Education (DOE).

VA's primary uses of Social Security numbers (SSNs) are threefold:

(1) Locate Veterans and their dependents to ensure correct identification associated with the delivery of benefits and services;

(2) Identify employees for employment-related record keeping; and

(3) Ensure 100 percent accuracy in patient identification.

Mistaken identity in the delivery of health care can result in catastrophic and tragic outcomes. Until such time when a comprehensive and equally accurate means to do this is established and implemented, the use of SSNs remains the best means of ensuring patient identification within our records.

In addition, SSNs must be used if required by law or regulation, for purposes such as: Background investigations; security checks for validation purposes, such as computer matching of records between government agencies; and support of unique identification.

Reliance on SSNs

VA currently relies on the SSN to ensure that the correct records are obtained and utilized to determine eligibility for VA benefits such as compensation, disability, education, and rehabilitation. VA is required by 38 U.S.C. § 5103A, to request evidence from third parties on behalf of Veterans to support their claims. In these requests, VA must sufficiently identify the party for whom it is seeking information. Many entities holding Veterans' records, including DoD, other government agencies, and private parties, continue to utilize SSNs as a primary identifier. As such, VA will face substantial challenges in obtaining records from these entities on behalf of Veterans if precluded from using the SSN. This will negatively impact Veterans by delaying the

time required to process their claims and possibly even preventing VA from obtaining the records needed to establish Veterans' eligibility to benefits.

VA's success rate in matching records with other Federal and non-Federal organizations is over 85 percent when the SSN is available compared to 20 percent when the SSN is not used. VA providers will not have access to important outside care information and could order redundant tests, slow decision making, or make incorrect and even harmful decisions when such data is unavailable. VA also participates in Health Information Exchanges with DoD, Walgreens, Kaiser Permanente, etc., and without the use of the SSN to help match the Veteran within these exchanges, critical health information will not be available leading to poor health care decisions and slower treatment.

Elimination of SSN use is not solely a function of information technology (IT). The business processes used by VHA, VBA and other VA offices require a complete overhaul in how they establish absolute identity verification inside VA and most importantly outside of VA. IT solutions to eliminate SSN use can only occur after the integrated and comprehensive review of the prevalence and inter-connectedness of SSN use is complete.

Efforts to reduce the use of SSNs

VA recognizes the growing threat posed by identity theft and the impact on Veterans, dependents and employees. In 2009, VA created and implemented the enterprise-wide Social Security Number Reduction (SSNR) effort, in response to the Office of Management and Budget Memorandum M-07-16, "Safeguarding Against and

Responding to the Breach of Personally Identifiable Information (May 2007)." The key goal of the SSNR is to reduce or eliminate the unnecessary collection and use of SSNs as the Department's primary identifier, while maintaining the 100 percent requirement for proper Veteran-Patient identification. For example:

- VHA eliminated the use of SSNs on appointment letter correspondence and the Veterans Health Identification card.
- VA Pharmacy mail out eliminated the SSN from prescription bottles & mailing labels.
- VA removed the SSN from several forms where it was not deemed necessary.
- VA is currently evaluating the elimination of SSNs from correspondence.
- VA set defaults in some software to eliminate printing SSNs, e.g. Document Storage System/Release of Information (DSS/ROI).
- NCA has reviewed and reevaluated all of its forms requiring SSNs.
- VA/DoD Health Information Exchange Joint Legacy Viewer is using the Integration Control Number (ICN), Electronic Data Interchange Personal Identifier (EDIPI) and other demographics for trait matching while phasing out use of the SSN.
- VHA is utilizing a SSNR tool to collect VHA's SSN holdings data but it has limitations due to outdated technology. The Office of Information & Technology (OIT) is currently developing a new SSNR tool for VA-wide use which is expected to be completed by September 2017.

Master Veteran Index System

As VA works to migrate away from the use of SSNs as the sole means of Veteran identification in our records, OIT is collaborating with the Veterans Relationship Management Initiative to create the Master Veteran Index (MVI) system and require MVI integration for every VA system. MVI serves as the authoritative identity service within VA. MVI assigns an ICN, a unique identifier, for Veterans, dependents and beneficiaries. The ICN is a sequentially assigned, non-intelligent number that, in itself, does not provide any protected sensitive information about the Veteran-patient. The ICN is a means to accurately and securely track the individual and confirm their identification. ICNs conform to the American Society for Testing and Materials International standard for a universal health care identifier. MVI now has information on over 26 million Veterans, dependents, and beneficiaries who have applied for health care. While additional work remains to fully extricate SSNs from Veteran records, including re-engineered business processes and legacy system upgrades, programs like MVI have made significant progress towards the goal of SSN reduction.

Challenges

There are several major challenges facing VA regarding the elimination of the unnecessary collection and use of the SSN:

- An organization wide analysis of VA IT systems needs to be conducted due to the volume of interfaced IT systems VA uses for clinical care and administrative functions. VA anticipates that many IT system changes need to be made before VA can implement new unique identifiers that will replace the SSN as the primary identifier.

- Culture change among employees is required since long time employees are accustomed to using the SSN to authentication purposes. VA will need to implement education and retraining programs for employees to break the habit of using the SSN as the primary way to identify Veterans in its records. This has already begun, but it will take time to instill in the workforce and processes across the Department. After the MVI correlation is complete, it will still take several years to change IT system look up tables to search for Veterans and beneficiaries with the ICN or EDIPI instead of the SSN.

- Culture change is necessary for Veterans as well. Resistance to change will need to be balanced against the continued threat to identity theft if the old card is lost or stolen.

Conclusion

VA has made considerable progress towards implementing the SSN reduction initiative. VA continues to reduce the use of SSNs with the goal to replace the SSN with an alternative primary identifier. The timeframe to implement an alternate primary identifier would be contingent upon an organization-wide information system analysis, business needs, technology upgrades and funding.

This concludes my testimony, and I am prepared to answer any questions you or other Members of the Subcommittees may have. Thank you.