U.S. Environmental Protection Agency
Implementation Plan to Reduce or Eliminate Unnecessary Use of
Social Security Numbers
FY-16

In accordance with OMB Memorandum M-07-16, EPA is reviewing its findings to identify instances in which the collection or use of the SSN is superfluous.

- US Government Accountability Office (GAO) conducted a government survey on the reduction of SSNs in August of 2016. At that time, EPA reported 16 federal information systems collected a total of 1,516,450 records. EPA is using these numbers as the established baseline of PII collections. From this baseline, superfluous uses will be identified.
  - o If superfluous use is identified, a system-appropriate plan will be developed to remove or supplement the SSN with another identifier and/or prevent the SSN from being displayed or printed.
- EPA's National Privacy Program is implementing the plan for reducing SSNs by issuing a data call to identify the collection and uses in systems, programs, Websites and on forms. In addition, in FY 2017 forms (paper/electronic) that collect SSN will be reviewed to determine if the collection is unnecessary and can be replaced with another identifier or removed.
  - o Review of Privacy Act Statement or Privacy Notice (PN)
  - o Ensure PAS/PN is present, adequate, and include the appropriate provisions at the point of collection.
- EPA has already begun to reduce the use of SSNs in systems, Websites and forms through truncating, not displaying and using alternative identifiers.
  - o Any reduction of SSN uses are reviewed twice a year and reported annually.
  - o This SSN reduction plan is an ongoing process.

Types of Superfluous Collection	Action Item
Forms that collect SSNs	- Identify Agency forms that collect SSNs. - Review forms to determine if SSNs are superfluous. - Revise forms to replace fields that use SSNs. - Remove outdated forms from circulation.
Systems that Collect SSNs	- Identify Agency systems that collect SSNs. - Determine if SSN collection is superfluous. - Develop system-appropriate plans of actions to eliminate, truncate or mask SSN display on screen and in printed reports - Determine if current safeguards are adequate to protect SSN collections deemed "necessary".
Websites that Collect SSNs	- Review Agency Websites to identify and remove Agency forms posted by programs and regions that collect SSNs but have been replaced or discontinued by the Agency.

Determine the number of SSNs reduced or eliminated:
1 truncated, 1 no longer displayed, 1 alternative number