

Naval Audit Service



Audit Report



Unnecessary Collection of Personally Identifiable Information in the Department of the Navy

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N2011-0020

28 January 2011

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NAVAL AUDIT SERVICE
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WASHINGTON NAVY YARD, DC 20374-5005

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N2009-NFO000-0132.000
28 Jan 11

**MEMORANDUM FOR DEPARTMENT OF THE NAVY CHIEF INFORMATION
OFFICER**

**Subj: UNNECESSARY COLLECTION OF PERSONALLY IDENTIFIABLE
INFORMATION IN THE DEPARTMENT OF THE NAVY (AUDIT
REPORT N2011-0020)**

Ref: (a) NAVAUDSVC ltr 7510/N2009-NFO000-0132.000 dated 29 Jul 09
(b) SECNAV Instruction 7510.7F, "Department of the Navy Internal Audit"

Encl: (1) Status of Recommendations
(2) Examples of Forms and Systems Exposing Social Security Numbers
(3) Scope and Methodology
(4) Activities Visited and/or Contacted
(5) Management Response from the Office of the Department of the Navy Chief
Information Officer

1. Introduction/Reason for Audit.

a. The report provides results of the subject audit announced in reference (a). Paragraph 4 of this report provides our audit results. Paragraph 6 provides our recommendations, corrective actions, and additional information. Guidance on followup correspondence for the open recommendations is included in paragraph 7.

b. The audit objective was to verify that only necessary personally identifiable information (PII)¹ was collected within DON. We focused on the unnecessary collection of PII (and particularly Social Security numbers (SSN)) in DON due to the risk of identity theft. The former Vice Chief of Naval Operations expressed concern over the collection of unnecessary PII in DON at the Oversight Planning Board meeting in December 2008. After being briefed on Naval Audit Service's PII efforts, the former Director, Navy Staff asked us to continue to provide PII related audit coverage until

¹Personally identifiable information (PII) is any information or characteristics that may be used to distinguish or trace an individual's identity, including but not limited to names, Social Security numbers (SSNs), or biometric records.

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PII-related risks were mitigated. PII continued to be identified as a risk in the Fiscal Years 2009 and 2010 DON Risk and Opportunity Assessment Reports. It was also included as a material weakness in the Fiscal Year 2010 DON Statement of Assurance. We conducted this audit from 29 July 2009 through 22 December 2010 in accordance with Generally Accepted Government Auditing Standards (Enclosure 3).

2. Background.

a. In April 2007, the President's Task Force on Identity Theft published a strategic plan requiring all Federal agencies to develop and implement a plan to reduce the unnecessary use of SSNs. As a result, Office of Management and Budget Memorandum M-07-16, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information," dated 22 May 2007, required Federal agencies to review and reduce the volume of PII. It also required that they review the use of SSNs in agency systems and programs to identify instances in which the collection or use of SSNs is "superfluous." In addition, Office of Management and Budget Federal Information Security Management Act reporting instructions for Fiscal Years 2008,² 2009,³ and 2010,⁴ required agencies to submit the following:

- Breach notification policy and any significant changes since last year;
- Implementation plan and progress update on eliminating unnecessary use of SSNs; and
- Implementation plan and progress update on review and reduction of holdings of PII.

b. In response to the FY 2008 Office of Management and Budget Federal Information Security Management Act reporting requirement, the Department of Defense (DoD) issued Directive-Type Memorandum 07-015, "DoD Social Security Number Reduction Plan," dated 28 March 2008. The Directive-Type Memorandum 07-015 established DoD policy for the use of the SSN and guidance for reducing its unnecessary use. The Directive-Type Memorandum was in effect throughout this audit and had not been converted to a DoD Instruction as of 10 December 2010. It was identified as guidance on DoD and DON Web sites, and referenced in the DON Social Security Number Reduction Plan for Forms (issued 19 July 2010).

² Office of Management and Budget Memorandum M-08-21, "FY 2008 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management," dated 14 July 2008.

³ Office of Management and Budget Memorandum M-09-29, "FY 2009 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management," dated 20 August 2009.

⁴ Office of Management and Budget Memorandum M-10-15, "FY 2010 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management," dated 21 April 2010.

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c. There were multiple offices involved in the various aspects of privacy in DON (Privacy Act, forms, breaches, etc.) and several DON working group meetings were conducted focusing on SSN reduction. The Office of the DON CIO has also issued other guidance and helpful privacy tips regarding PII training, breaches, safeguarding, and handling.

d. According to the recent Under Secretary of the Navy memorandum, "Safeguarding Personally Identifiable Information," dated 12 February 2010, DON experienced repeated inadvertent releases of PII for Navy and Marine Corps military and civilian personnel and their dependents in the past year. The memo noted that the most common problem was the unauthorized release of personal SSNs.

3. Noteworthy Accomplishments.

a. On 30 October 2009, the Under Secretary of the Navy appointed the DON CIO as the Senior Military Component Official for Privacy. This new position was delegated the responsibility for oversight of DON's implementation of the Privacy Act. As DON's Senior Military Component Official for Privacy, the DON CIO will:

- Oversee the Department's Privacy Program, and
- Lead policy oversight and coordination in DON's development and evaluation of legislative, regulatory, and other policy proposals that pertain to information privacy issues. This includes matters relating to DON's collection, use, sharing, and disclosure of personal information.

b. On 19 July 2010, the Office of the DON CIO issued the DON Social Security Number Reduction Plan for Forms, which requires the review, justification, and elimination of SSN use on all DON forms. The review and justification for all official forms was to be completed by 1 October 2010; however, as of 22 November 2010, it was not complete. The DON Social Security Number Reduction Plan for Forms also noted that the DON CIO will release a similar message for Command Information Officers to review all information technology systems as well. As of 23 November 2010, the message had not been issued.

c. During the audit, we found that the Perform to Serve Web site required a full SSN to log in, and it did not mask or truncate the SSN when entered. According to the Perform to Serve system manager, Perform to Serve collects and contains SSNs for 330,000 enlisted personnel and 46,000 officers. We brought this to the attention of the DON CIO, who contacted the Perform to Serve system manager. The manager immediately took action to mask the SSN.

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d. Per the Office of the DON CIO memorandum, dated 21 January 2011, the Office of the DON CIO submitted a system change request to the DON Application and Database Management System Configuration Control Board requiring the “SSN” and “Ident Info” fields in the DoD Information Technology Registry-DON be populated in October 2010.⁵

4. Audit Results.

We found that DON was unable to determine that only necessary PII was being collected, and SSNs were printed/displayed on systems and forms without being masked/truncated as required. These conditions occurred because:

- There was no overall DON guidance to reduce the collection of SSNs;
- The DoD Information Technology Portfolio Registry-DON database was incomplete;
- DON could not identify all DON forms in order to reduce or eliminate their collection of SSNs; and
- There was no DON requirement limiting exposure of SSNs.

As a result, DON does not have assurance that the collection and use of SSNs across the Department has been appropriately reviewed and reduced. Thus, the risk of identity theft has not been appropriately reduced in DON.

Unnecessary Collection of PII

We found that DON was unable to determine that only necessary PII was being collected. Both the Office of Management and Budget Memorandum M-07-16, “Safeguarding Against and Responding to the Breach of Personally Identifiable Information,” dated 22 May 2007, and the DoD Directive-Type Memorandum 07-015 require the review and reduction of the volume of PII, and collection/use of SSNs. DON’s inability to make the required determination occurred because:

- There was no overall DON guidance to reduce the collection of SSNs;
- The DoD Information Technology Portfolio Registry-DON database was incomplete and system managers were able to register systems without completing “SSN”⁶ and “Ident Info”⁷ fields; and

⁵ Completed action was addressed in the Office of the DON CIO (Enclosure 5), but was not verified by audit team.

⁶ According to the DoD Information Technology Portfolio Registry-DON Data Dictionary, the “SSN” field denotes whether the system contains SSNs.

⁷ According to the DoD Information Technology Portfolio Registry-DON Data Dictionary, the “Ident Info” field denotes whether the system contains PII.

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- DON did not identify all DON forms in order to reduce/eliminate collection of SSNs.

DON Guidance

There was no overall DON guidance to reduce the collection of SSNs as required by the DoD Directive-Type Memorandum 07-015, “DoD Social Security Number Reduction Plan,” dated 28 March 2008. The DoD Directive-Type Memorandum 07-015 requires review of SSN use and justification on DON forms and systems to eliminate unnecessary use. Although the DON CIO issued a DON Social Security Number Reduction Plan for Forms on 19 July 2010, this plan did not establish overall guidance to reduce the collection of SSNs in DON that includes systems, applications, Web sites, letters, emails, and memos.

DON Systems

As of 23 July 2010, the DoD Information Technology Portfolio Registry-DON⁸ database was incomplete and system managers were able to register systems without completing the “SSN” and “Ident Info” fields. These fields indicate whether a system contains SSNs and PII respectively.

According to the DoD Directive-Type Memorandum 07-015, “DoD Social Security Number Reduction Plan,” all data elements in the DoD Information Technology Portfolio Registry relating to SSNs are mandatory data fields and shall be completely filled out by all DoD Components. In addition, the DoD Information Technology Portfolio Registry guidance requires that the “Ident Info” field must be complete within the DoD Information Technology Portfolio Registry for all systems. The Office of the DON CIO message 092034z⁹, dated August 2008, states that the DoD Information Technology Portfolio Registry-DON is the DON feeder system to the DoD Information Technology Portfolio Registry, which the Office of the Secretary of Defense uses to report to the Office of Management and Budget and Congress. Additionally, a DoD September 2008 memorandum¹⁰ required Components to ensure that the PII holdings for each system are accurate, relevant, and complete.

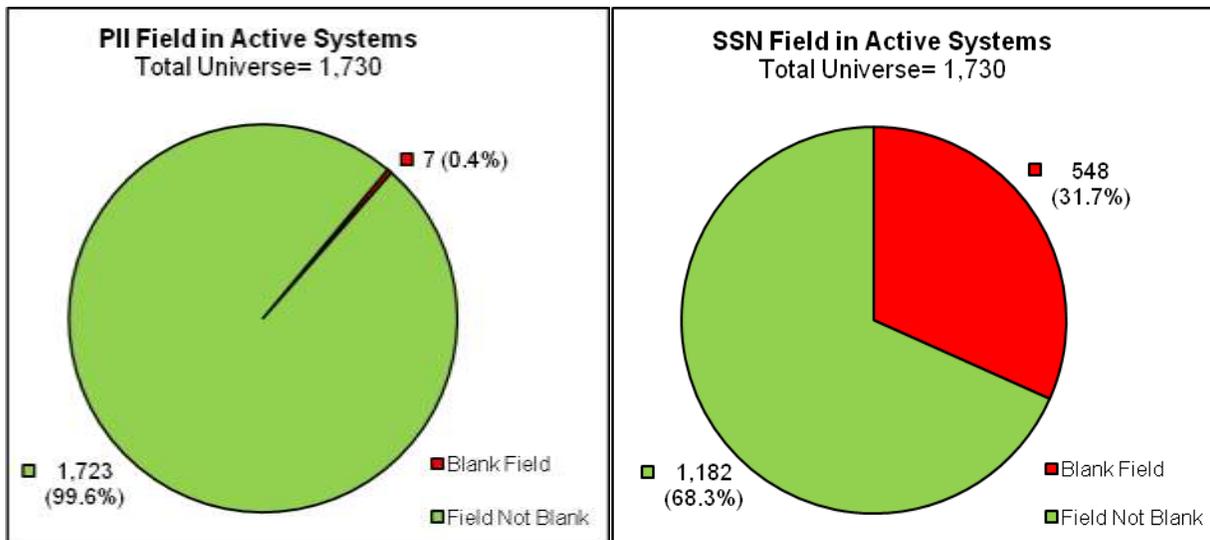
⁸ DoD Information Technology Portfolio Registry is DoD’s authority source for all unclassified information technology systems. DoD Information Technology Portfolio Registry-DON populates the DoD Information Technology Portfolio Registry weekly with DON information technology system information. The DoD Information Technology Portfolio Registry is contained in the DON Application and Database Management System. The DON Application and Database Management System Configuration Control Board has overall responsibility for DON Application and Database Management System requirements management, including DoD Information Technology Portfolio Registry.

⁹ Office of the DON CIO message 092034z, “Certification of Compliance with Information Technology Registration,” dated August 2008.

¹⁰Office of the Secretary of Defense Policy Memorandum, “Safeguarding Against and Responding to the Breach of PII,” dated 25 September 2008.

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Specifically, we found that only 7 of 1,730 (0.4 percent) active systems^{11,12} in the DoD Information Technology Portfolio Registry-DON did not identify if they collected PII. However, 548 of 1,730 (31.7 percent) active systems in DoD Information Technology Portfolio Registry-DON did not identify if they collected SSNs as shown in the charts below:



We also found that 3,814 of 4,936 (77.3 percent) inactive systems^{13,14} in the DoD Information Technology Portfolio Registry-DON did not identify if they collected PII. Additionally, 4,771 of 4,936 (96.7 percent) inactive systems in the DoD Information Technology Portfolio Registry-DON did not identify if they collected SSNs. See charts below.

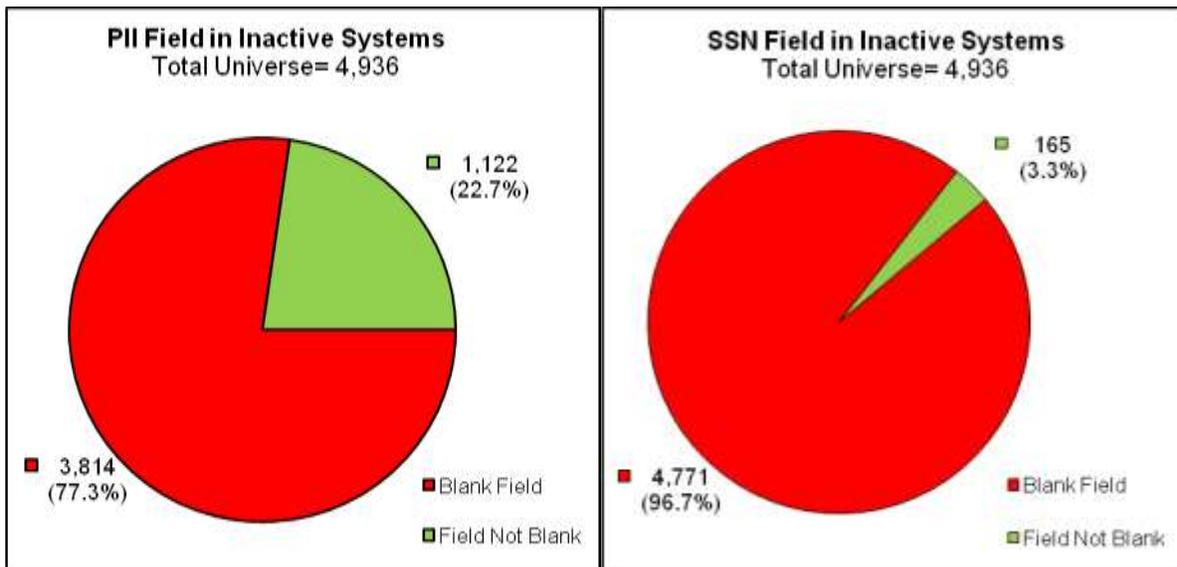
¹¹ According to the 2006 DoD Information Technology Portfolio Registry-DON guidance, an active system is a system that is currently fielded and actively in use.

¹² Out of 6,666 active, inactive-terminated, inactive-replaced, and inactive-errors systems in the DoD Information Technology Portfolio Registry-DON as of 23 July 2010.

¹³ According to the 2006 DoD Information Technology Portfolio Registry-DON guidance, an inactive system is a system that has been terminated (a system that is no longer in use and has been replaced by another); replaced by another system (no longer in use); or entered into the DoD Information Technology Portfolio Registry-DON in error (entry should not have been entered into the DoD Information Technology Portfolio Registry-DON).

¹⁴ Out of 6,666 active, inactive-terminated, inactive-replaced, and inactive-errors systems in the DoD Information Technology Portfolio Registry-DON as of 23 July 2010.

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The considerable percentage of blank fields in the DoD Information Technology Portfolio Registry-DON contributes to the DON not being able to appropriately review and reduce the collection of PII and SSNs.

DON Forms

As of 22 November 2010, DON could not identify all DON forms in order to reduce the collection of SSNs. The DoD Directive-Type Memorandum 07-015, “DoD Social Security Number Reduction Plan,” dated 28 March 2008, requires DON to maintain a forms database to produce an annual report. This report provides information for the Federal Information Security Management Act report and includes:

- Number of forms requesting SSNs,
- Number of SSN justifications accepted and rejected,
- Examples of forms where SSNs were not allowed, and
- Examples of SSN masking or truncation.

The DON Forms Manager began a three-phased forms review process with phase 1 (beginning in December 2007), in which DON reports having self identified 26,000 DON forms. We were unable to verify the number of forms because an audit trail did not exist. Phases 2 and 3 were designed to consolidate the command-level forms and to determine if Echelon II-level forms could be combined for use among multiple commands at the DON-level. However, phases 2 and 3 were postponed in August 2009 because there was no DON SSN Reduction Plan. DON has a Web site, Naval Forms Online, which is a repository

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for DON forms. However, while command forms managers were encouraged to upload forms onto this Web site, this was not a DON policy. Also, as of 24 March 2010, Naval Forms Online only listed approximately 3,000 of the 26,000 (11 percent) forms DON had self identified.

As noted previously, on 19 July 2010, the DON CIO issued procedures for a review of all DON forms in order to reduce the collection of SSNs. Form managers were required to register all new and existing official forms on Naval Forms Online by 1 October 2010. However, as of 22 November 2010, the SSN review and registering of forms on Navy Forms Online had not been completed.

SSN Exposure

We found that SSNs of DON personnel were exposed on forms and systems. Office of Personnel Management Memorandum, "Guidance on Protecting Federal Employee Social Security Numbers and Combating Identity Theft," dated 18 June 2007, requires eliminating the unnecessary printing and displaying of SSNs and masking SSNs when they are used. In addition, DoD Directive 5400.11, "DoD Privacy Program," dated 8 May 2007, requires DoD personnel to protect an individual's privacy when collecting, maintaining, using, or disseminating personal information. Examples of forms and systems exposing SSNs of DON personnel found during the audit are in Enclosure 2. One example was the Defense Travel System, which displays full SSNs on DON travel orders and vouchers. DON Defense Travel System has had an approved change request to mask SSNs on DON travel orders and vouchers for at least a year. However, as of 23 November 2010, the DON Defense Travel System Program Management Office had not provided an implementation date.

These forms and systems printed/displayed SSNs without masking or truncating them because there was no DON requirement limiting exposure (printing/displaying) of SSNs and other PII, and because DON did not have control over non-DON forms and systems. We interviewed personnel from key DON privacy offices¹⁵ about the vulnerability of the printing/displaying of full SSNs on high-volume and widely distributed forms and learned that no actions were being taken to limit the exposure of SSNs.

Impact

As a result of the conditions described in this report, DON does not have assurance that the collection and use of SSNs across the DON has been appropriately reviewed and reduced. Thus, the risk of identity theft has not been appropriately reduced in DON.

¹⁵ DON Chief Information Office; DON Privacy Act Office (DNS-36); DON Forms Office (DNS-5); Marine Corps Privacy Act Office; Marine Corps Forms Office; Marine Corps Command, Control, Communications and Computers (C4) Information Assurance Office.

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For the detailed scope and methodology, refer to Enclosure 3.

5. **Communication with Management.** We routinely briefed DON CIO personnel during the audit. Between July and October 2010, we briefed them on the overall status of our audit, likely findings, and potential recommendations.

6. **Recommendations, Corrective Actions, and Addition Information.**

Our recommendations, summarized management responses, and our comments on the responses are presented below, as applicable. The complete text of the Office of the Department of the Navy Chief Information Officer's responses is in Enclosure 5.

We recommend that the Department of the Navy Chief Information Officer:

Recommendation 1. Finalize, issue, and execute overall Department of the Navy guidance to reduce the collection of Social Security numbers that includes, but is not limited to, systems, applications, Web sites, forms, letters, emails, and memos.

Management response to Recommendation 1: Concur. Action will require the release of the Department of Defense Social Security Number Reduction Plan Instruction due for final Department of Defense component review January 2011. Final Department of the Navy plan to be completed within 90 days of release of Department of Defense Social Security Number Reduction Plan.

Recommendation 2. Establish milestones and a mechanism for monitoring progress of the overall Department of the Navy Social Security Number Reduction guidance.

Management response to Recommendation 2: Concur. Action will be included in Department of the Navy Social Security Number Reduction Plan. Final Department of the Navy plan to be completed within 60 days of release of Department of Defense Social Security Number Reduction Plan.

Naval Audit Service comments on management's response to Recommendations 1 and 2: Actions planned meet the intent of the recommendation. Because the target completion date is contingent upon Department of Defense action, we request Department of the Navy Chief Information Officer provide us with quarterly interim status reports. We

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consider this recommendation open until overall Department of the Navy guidance is issued.¹⁶

Recommendation 3. Submit a system change request to the Department of the Navy Application and Database Management System Configuration Control Board requiring the “SSN” and “Ident Info” fields in the Department of Defense Information Technology Portfolio Registry-Department of the Navy be populated for complete registration of systems, and establish a timeline for implementation.

Management response to Recommendation 3: Concur. System change request completed and implemented October 2010.

Recommendation 4. Establish a process to ensure that systems already registered in Department of Defense Information Technology Portfolio Registry-Department of the Navy have properly populated the “SSN” and “Ident Info” fields, and establish a timeline for implementation.

Management response to Recommendation 4: Concur. Action completed December 2010.

Recommendation 5. Establish a database that records all Department of the Navy forms that collect Social Security numbers of Department of the Navy personnel.

Management response to Recommendation 5: Concur. Action completed. Department of the Navy forms managers were directed by Department of the Navy Social Security Number Reduction Plan for Forms Phase 1 of 19 July 2010 to post all official forms to Naval Forms Online.

Recommendation 6. Issue a Department of the Navy policy to require that Department of the Navy forms that collect Social Security numbers at all echelons be included in the database established in Recommendation 5.

Management response to Recommendation 6: Concur. Action completed with release of Department of the Navy Social Security Number Reduction Plan for Forms Phase 1 of 19 July 2010. Policy states that forms managers must post all official forms including those that collect social security numbers, to Naval Forms Online.

¹⁶ Subsequent correspondence from the Office of the Department of the Navy Chief Information Officer clarified that the Department of the Navy plan is to be completed within 90 days of release of the Department of Defense Social Security Number Reduction Plan.

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Naval Audit Service comments on management's response to Recommendations 3, 4, 5, and 6: Actions taken satisfy the intent of the recommendations. We consider these recommendations closed.

Recommendation 7. Issue a Department of the Navy policy to require that all form managers identify whether forms collect Social Security numbers, and include Social Security number justifications in the database established in Recommendation 5.

Management response to Recommendation 7: Partially concur. Naval Forms Online already has social security number and Privacy Act Statement metadata fields. Concur that Naval Forms Online add a checkbox to indicate date justifications were completed. Justification forms will be kept with the form history files and the record copy uploaded to the official Navy or Marine Corps records management solution. Adding a checkbox to Naval Forms Online will be completed by July 2011. The Office of the Department of the Navy Chief Information Officer and the Director Navy Directives and Records Management non-concur with uploading justification forms to Naval Forms Online. Justifications are an internal government requirement and because Naval Forms Online is a public facing website there may be sensitivities that should not be shared with the public. Additionally, the cost of program changes to Naval Forms Online that would be required are not warranted since each Service already has a records management tool designed for this purpose.

Naval Audit Service comments on management's response to Recommendation 7: In light of the concern raised in the Office of the Department of the Navy Chief Information Officer's response about Naval Forms Online being a public facing website, the process of capturing the justification date in Naval Forms Online and maintaining the justification forms in a records management solution satisfy the intent of the recommendation. We consider this recommendation open until July 2011, when a justification checkbox will be added to Naval Forms Online.

Recommendation 8. Establish milestones and a mechanism for monitoring progress of Recommendations 6 and 7.

Management response to Recommendation 8: Concur. Department of the Navy Chief Information Officer will issue additional guidance establishing a mechanism for monitoring progress whereby: 1. All new and existing official Department of the Navy forms are registered in Naval Forms Online; 2. All new and existing forms that collect Social Security numbers have an approved

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justification for continued Social Security number use are posted to Naval Forms Online.

Naval Audit Service comments on management's response to

Recommendation 8: Actions planned meet the intent of the recommendation. We consider July 2011 (which was the target completion date for adding a checkbox to Naval Forms Online) to be the target completion date. We consider this recommendation open until guidance noted in the Department of the Navy Chief Information Officer response is issued.

Recommendation 9. Issue a Department of the Navy policy to limit exposure of Social Security numbers and other personally identifiable information wherever used; require exposure be justified to the Department of the Navy Senior Military Component Official for Privacy; and establish milestones and a reporting mechanism for results.

Management response to Recommendation 9: Partially concur. Concur with issuing a Department of the Navy policy to limit exposure of Social Security numbers and other personally identifiable information and the establishment of milestones to include a reporting mechanism. However, these actions are addressed in Recommendations 1 and 2, respectively.

Non-concur with requiring exposure of Social Security numbers and other Personally Identifiable Information be justified to the Department of the Navy Senior Military Component Official for Privacy. Per the Directive-Type Memorandum-07-015 Under Secretary of Defense (Personnel and Readiness) justifications shall be reviewed by the Department of Defense Component wide forms manager for component wide forms and the command and installations forms manager for command and installation forms, justification shall be reviewed at least one administrative level above the senior signing official. Department of the Navy Social Security Number Reduction Plan for Forms Phase 1 of 19 July 2010 also established a review process that does not include the Department of the Navy Senior Military Component for Privacy. Such a review is unnecessary and would require unfunded staffing resource. Additionally, justification of Social Security number use in memos, emails, spreadsheets etc., where data collection is unstructured and not registered to an authoritative database is not feasible. While these media present potential misuse and unnecessary collection of the Social Security number, Department of the Navy Chief Information Officer will issue policy guidance that will address personnel accountability and training.

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Naval Audit Service comments on management's response to

Recommendation 9: The Office of the Department of the Navy Chief Information Officer's response to issue Department of the Navy policy to limit exposure and establish milestones that will include a reporting mechanism satisfies the intent of the recommendation. We recognize that establishing a reporting mechanism to follow up on progress of limiting exposure negates the need for exposure justifications to be provided to the Department of the Navy Senior Military Component for Privacy. Because the target completion date is contingent upon Department of Defense action, we request Department of the Navy Chief Information Officer provide us with quarterly interim status reports. We consider this recommendation open until guidance noted in the Department of the Navy Chief Information Officer response to Recommendations 1 and 2 is issued.

Additional Information:

The Office of the Department of the Navy Chief Information Officer's response requested that the title of the audit be changed because the focus of the audit was on the use of Social Security numbers. While the audit did focus on Social Security numbers (a subset of Personally Identifiable Information), it was not at the exclusion of Personally Identifiable Information; and the audit, the report, and the recommendations address both Social Security numbers and Personally Identifiable Information.

The Office of the Department of the Navy Chief Information Officer's response noted that some of the forms listed in the report were not under Department of the Navy control, that there was no indication the examples of forms under Department of the Navy control were exposing Social Security numbers unnecessarily, and review processes in place for forms and systems were not mentioned in the report. While we recognize that these review processes exist, they were beyond the scope of the audit necessary to address the audit objective. We acknowledge in the report that Department of the Navy did not have control over non-Department of the Navy forms and the report does not hold Department of the Navy accountable. The report does not state that these forms and systems exposed Social Security numbers unnecessarily; just that they affect Department of the Navy personnel because they expose Social Security numbers.

The Office of the Department of the Navy Chief Information Officer's response recommended that the information relating to inactive systems as well as specific information regarding forms be deleted from this report. Based on conversations with personnel from the Office of Department of the Navy Chief Information Officer and

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on the uncertainties as to whether these inactive systems contain Personally Identifiable Information and Social Security numbers, we believe that the considerable percentage of blank fields in the inactive (as well as active) systems contributes to the Department of the Navy not being able to appropriately review and reduce the collection of Personally Identifiable Information and Social Security numbers. During conversations with personnel from the Department of the Navy Forms Office, we were told that phases 2 and 3 of the Department of the Navy forms review process were postponed until the Social Security number reduction process had been implemented.

The Office of the Department of the Navy Chief Information Officer's response recommended that the audit modify statements that state that Department of the Navy has no overall guidance to reduce the collection of Social Security numbers and pointed out that the Department of Defense Social Security Number Reduction Plan is still in draft. While we recognize that the Department of Defense has a draft instruction, it has been in draft since at least March 2009. Furthermore, the Office of Management and Budget required Federal agencies to review and reduce the volume of Personally Identifiable Information in May 2007 and the Department of Defense Directive-Type Memorandum – Department of Defense Social Security Number Reduction Plan, dated March 2008, provided guidance to reduce the unnecessary use of Social Security numbers. This report acknowledges that the Office of the Department of the Navy Chief Information Officer issued the Department of the Navy Social Security Number Reduction Plan for Forms; however, this plan is not overall guidance to reduce the collection of Social Security numbers across the Department of the Navy.

7. Guidelines for Followup Correspondence.

a. Actions taken by the Office of the Department of the Navy Chief Information Officer meet the intent of Recommendations 3-6, and the recommendations are closed. Actions planned by the Office of the Department of the Navy Chief Information Officer meet the intent of Recommendations 1, 2, and 7-9. These recommendations are considered open pending completion of the planned corrective actions, and are subject to monitoring in accordance with reference (b). Management should provide a written status report on the recommendations within 30 days after target completion dates.

b. Please provide all correspondence to the Assistant Auditor General for Manpower and Reserve Affairs Audits, XX, with a copy to the Director, Policy and Oversight, XXXXXXXXXXXXXXXX, XXXXXXXXXXXXXXXXXXXXXXXX. Please submit correspondence in electronic format (Microsoft Word or Adobe Acrobat file), and ensure that it is on letterhead and includes a scanned signature.

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8. Any requests for this report under the Freedom of Information Act must be approved by the Auditor General of the Navy as required by reference (b). This audit report is also subject to followup in accordance with reference (b).

9. We appreciate the cooperation and courtesies extended to the auditors.



XXXXXXXXXXXXXXXXXXXXX
Assistant Auditor General
Manpower and Reserve Affairs Audits

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Enclosure 1:**Status of Recommendations**

Recommendations							
Finding ¹⁷	Rec. No.	Page No.	Subject	Status ¹⁸	Action Command	Target or Actual Completion Date	Interim Target Completion Date
1	1	9	Finalize, issue, and execute overall Department of the Navy guidance to reduce the collection of Social Security numbers that includes, but is not limited to, systems, applications, Web sites, forms, letters, emails, and memos.	O	Department of the Navy Chief Information Officer (DON CIO)		4/28/2011 ¹⁹
1	2	9	Establish milestones and a mechanism for monitoring progress of the overall Department of the Navy Social Security Number Reduction guidance.	O	DON CIO		4/28/2011 ²⁰
1	3	10	Submit a system change request to the Department of the Navy Application and Database Management System Configuration Control Board requiring the "SSN" and "Ident Info" fields in the Department of Defense Information Technology Portfolio Registry- Department of the Navy be populated for complete registration of systems, and establish a timeline for implementation.	C	DON CIO	10/31/10	
1	4	10	Establish a process to ensure that systems already registered in Department of Defense Information Technology Portfolio Registry- Department of the Navy have properly populated the "SSN" and "Ident Info" fields, and establish a timeline for implementation.	C	DON CIO	12/31/10	
1	5	10	Establish a database that records all Department of the Navy forms that collect Social Security numbers of Department of the Navy personnel.	C	DON CIO	7/19/10	

¹⁷ / + = Indicates repeat finding.

¹⁸ / O = Recommendation is open with agreed-to corrective actions; C = Recommendation is closed with all action completed; U = Recommendation is undecided with resolution efforts in progress.

^{19,20,21} Because completion of the final Department of the Navy plan is contingent upon release of the Department of Defense Social Security Number Reduction Plan, we request that Department of the Navy Chief Information Officer provide us with quarterly interim status reports.

Recommendations							
Finding ¹⁷	Rec. No.	Page No.	Subject	Status ¹⁸	Action Command	Target or Actual Completion Date	Interim Target Completion Date
1	6	10	Issue a Department of the Navy policy to require that Department of the Navy forms that collect Social Security numbers at all echelons be included in the database established in Recommendation 5.	C	DON CIO	7/19/10	
1	7	11	Issue a Department of the Navy policy to require that all form managers identify whether forms collect Social Security numbers, and include Social Security number justifications in the database established in Recommendation 5.	O	DON CIO	7/31/11	
1	8	11	Establish milestones and a mechanism for monitoring progress of Recommendations 6 and 7.	O	DON CIO	7/31/11	
1	9	12	Issue a Department of the Navy policy to limit exposure of Social Security numbers and other personally identifiable information wherever used; require exposure be justified to the Department of the Navy Senior Military Component Official for Privacy; and establish milestones and a reporting mechanism for results.	O	DON CIO		4/28/2011 ²¹

Enclosure 2:

Examples of Forms and Systems Exposing Social Security Numbers

Examples of Forms Exposing Social Security Numbers

Office of Management and Budget Form 0930-0158 – Federal Drug Testing Custody and Control

Office of Personnel Management Form 612 – Optional Application for Federal Employment

Office of Personnel Management Form 630-A – Leave Request/Authorization

Office of Personnel Management Form 306 – Declaration for Federal Employment

Defense Travel System Travel Orders and Vouchers

Standard Form 50 – Notification of Personnel Action

Standard Form 86 – Questionnaire for National Security Position

Standard Form 182 – Authorization, Agreement and Certification of Training

Department of Defense Form 2249 – Department of Defense Building Pass

Department of Defense Form 2766C – Adult Preventive and Chronic Care Flow Sheet

Comptroller of the Navy Form 3065 - Leave Request/Authorization

Military Entrance Processing Command Form 680-3A-E – Request for Examination

Navy Personnel Command Form 1610/2 – Fitness Report and Counseling Record

Navy Recruiting Form 1070/2 – Reenlistment Eligibility Data Display Form

Navy Recruiting Form 1131/36 – Active Duty Orders to Officer Candidate

Navy Recruiting Form 1131/154 – Special Duty-Information Warfare, Information Professional, Intelligence

Navy Marine Corps Form 11114 – Prospect/Applicant Card

Patuxent River Naval Air Station Visitor Form

Naval Support Activity Washington Visitor Application

Naval Support Activity Washington Permanent Parking Permit Application

Personnel Support Detachment Travel History Form

Examples of DON Systems Exposing Social Security Numbers (SSNs)

Name	Users²²	SSNs Collected²³
Badging and Security Information System	12	unknown ²⁴
Automated Badging System	31	76,954
ieFACMAN Gateway and Reporting Application	659	34,938
Navy Retention Monitoring System	13,189	791,024
Perform to Serve	4,716	376,000

²² Numbers provided by system points of contact.

²³ Numbers provided by system points of contact.

²⁴ System manager was uncertain how many SSNs were collected because the system collects them for all personnel entering the Patuxent River Naval Air Station in Patuxent River, MD.

Scope and Methodology

Scope and Methodology

We reviewed applicable Federal, Department of Defense (DoD), and Department of the Navy (DON) laws, regulations, and directives. We evaluated compliance and assessed internal controls related to the collection of personally identifiable information (PII) (and particularly Social Security Numbers (SSNs)) on DON forms and systems. We interviewed personnel from: the DON Chief Information Office; DON Privacy Act Office; DON Forms Office; Marine Corps Privacy Act Office; Marine Corps Forms Office; and Marine Corps Command, Control, Communications and Computers (C4) Information Assurance Office. We determined which office was responsible for overseeing a DON SSN Reduction Plan, any ongoing DON efforts to reduce the collection of SSNs, and any potential issues related to the collection of SSNs. We also attended a DON Forms Working Group meeting and a DON SSN Reduction Working Group meeting. We also interviewed personnel from these offices to obtain the DON annual Federal Information Security Management Act reports for Fiscal Years 2007-2009 and examine DON and DoD's submitted responses to Office of Management and Budget Federal Information Security Management Act requirements.

We obtained access to the DoD Information Technology Portfolio Repository- DON database and ran queries to determine:

- Whether systems collected SSNs;
- Whether systems did not collect SSNs; or
- Whether systems identified if they collected SSNs.

We conducted an exploratory random sample of the systems from each query and interviewed system points of contact to verify the DoD Information Technology Portfolio Registry-DON information as it related to the collection of SSNs. Our total sample size was 42 out of a universe of 6,785 systems that were in the DoD Information Technology Portfolio Registry-DON as of 10 September 2009.

We ran additional queries within the original DoD Information Technology Portfolio Registry-DON data to determine:

- Whether systems collected PII;
- Whether systems did not collect PII; or
- Whether systems identified if they collected PII.

We also ran queries within the DoD Information Technology Portfolio Registry-DON database as of 23 July 2010 with a universe of 6,666 systems to determine:

- Whether active systems identified if they collected SSNs;
- Whether active systems identified if they collected PII;
- Whether inactive systems identified if they collected SSNs; or
- Whether inactive systems identified if they collected PII.

We determined the number of DON forms listed on the Naval Forms Online Web site. We interviewed command forms managers and Privacy Act officers in the Naval District Washington area to determine command-level internal controls relating to the collection of PII, and particularly SSNs, and the number of command-level forms and systems. We visited a Navy and a Marine Corps recruiting station to identify forms used for new recruits.

We interviewed key DON privacy personnel about the vulnerability of printing/displaying full SSNs on high-volume and widely distributed forms, and about the SSN collection justification for forms and systems exposing SSNs we found during the course of our audit. We also interviewed the DoD Forms Manager, and the Navy Knowledge Online and the DON Defense Travel System Project Managers regarding the printing/displaying of SSNs on forms and systems.

We reviewed the applicable Managers' Internal Control Programs and found that DON identified safeguarding PII as a continued concern because of the high potential for risk of fraud. According to the Fiscal Year 2009 Managers' Internal Control Program, the Naval Audit Service has informed DON that there are ongoing and planned audit efforts regarding PII.

We reviewed Government Accountability Office, DoD Inspector General, and Naval Audit Service reports regarding PII. We found no reports specifically dealing with the collection of PII in DON; therefore, no followup was required.

Generally Accepted Government Auditing Standards

We conducted this audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Federal Managers' Financial Integrity Act

The Federal Managers' Financial Integrity Act of 1982, as codified in Title 31, United States Code, requires each Federal agency head to annually certify the effectiveness of the agency's internal and accounting system controls. During this audit, we identified internal control weaknesses in the collection of PII, and particularly the collection of SSNs. In our professional judgment, the control weaknesses identified are significant issues, and could potentially result in the compromise of PII, and particularly SSNs. This will place affected individuals at risk of identity theft, and ultimately damage the reputation of DON. Previous Naval Audit Service audits have identified internal control weaknesses in regard to the management and safeguarding of PII. We believe these audits show that insufficient controls over PII, and particularly SSNs, are a systemic weakness that may warrant reporting in the Auditor General's annual Federal Managers' Financial Integrity Act memorandum to the Secretary of the Navy.

Enclosure 4:

Activities Visited and/or Contacted

- Department of Defense Privacy Office, Arlington, VA
- Department of Defense Chief Information Office, Arlington, VA
- Department of Defense Forms Manager, Washington, DC
- Defense Manpower Data Center, Arlington, VA
- Department of the Navy Chief Information Office, Arlington, VA*
- Assistant for Administration to the Under Secretary of the Navy, Washington, DC
- Office of the Chief of Naval Operations, Arlington, VA
- Director, Navy Staff, Washington, DC*
- Headquarters Marine Corps, Quantico, VA*
- Marine Corps Systems Command, Quantico, VA
- Marine Corps Recruiting Station District of Columbia, Washington, DC*
- Bureau of Naval Personnel Command, Millington, TN
- Navy Recruiting Command, Millington, TN
- Commander, Navy Installations Command, Washington, DC*
- Commander, Navy Installations Command, Region Northwest, Bremerton, WA
- Commander, Navy Installations Command, Region Southeast, Pensacola, FL
- Naval Sea Systems Command, Washington, DC*
- Naval Sea Systems Command Puget Sound Naval Shipyard, Bremerton, WA
- Naval Sea Systems Command, Naval Surface Warfare Center – Crane Division, Crane, IN
- Naval Air Systems Command, Patuxent River, MD
- Naval Air Systems Command Whidbey Island, Oak Harbor, WA
- Naval Facilities Engineering Command, Washington, DC
- Naval Supply Systems Command, Philadelphia, PA
- Space and Naval Warfare Systems Command, System Center Pacific, San Diego, CA
- Space and Naval Warfare Systems Command, System Center Atlantic, Charleston, SC
- Space and Naval Warfare Systems Command, Information Technology Center, New Orleans, LA
- Naval Program Management Office, Strategic Systems Programs, Arlington, VA
- Naval Network Warfare Command, Norfolk, VA
- Naval Education and Training Command, Millington, TN
- Naval Surface Forces, US Pacific Fleet, San Diego, CA
- Naval Satellite Operations Center, Point Mugu, CA
- Military Sealift Command, Washington, DC
- Navy Recruiting Station Alexandria, Alexandria, VA*

*Denotes activity visited.

Enclosure 5:

Management Response from Department of the Navy Chief Information Officer



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF INFORMATION OFFICER
1000 NAVY PENTAGON
WASHINGTON, DC 20350-1000

21 January 2011

MEMORANDUM FOR ASSISTANT AUDITOR GENERAL OF THE NAVY FOR
MANPOWER AND RESERVE AFFAIRS AUDITS

Subj: RESPONSE TO NAVAUDSVC DRAFT AUDIT REPORT N2009-NFO000-0132,
UNNECESSARY COLLECTION OF PERSONALLY IDENTIFIABLE
INFORMATION IN THE DEPARTMENT OF THE NAVY, 22 DECEMBER 2010

Ref: (a) Naval Audit Service ltr 7510 of 22 Dec 2010

Encl: (1) DON Response to Subject Draft Audit

Reference (a) requires a response to subject audit within 30 calendar days of the report.

With two "partial concur" exceptions, the Department of the Navy Chief Information Officer (DON CIO) concurs with the audit findings and recommendations. Enclosure (1) contains the DON response. The DON CIO considers that this response contains no information deemed "For Official Use Only."

The DON CIO point of contact for this matter is [REDACTED]

[REDACTED]

Department of the Navy
Principal Deputy Chief Information Officer

Copy to:
Audit Director, [REDACTED]
DNS (Attn: [REDACTED] DNS-36; [REDACTED] DNS 52)
HQMC (Attn: [REDACTED] ARSF; [REDACTED] ARDE)

FOIA (b)(6)

FOIA (b)(6)

FOIA (b)(6)

Enclosure (1)

DON CIO RESPONSE TO NAVAUDSVC DRAFT AUDIT REPORT N2010-NFO000-0132, UNNECESSARY COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION IN THE DEPARTMENT OF THE NAVY, 22 DEC 2010

General Comments on the Audit Report:

1. While the title of this audit is, "Unnecessary Collection of Personally Identifiable Information (PII) in the Department of the Navy", the focus was on the use of the Social Security number (SSN) and not other PII. The term, "other PII" is very broad and should be the subject of a future Naval audit. Recommend this Audit be re-titled to read, "Unnecessary Collection of Social Security Numbers (SSNs) in the Department of the Navy".
2. Eleven of twenty-one forms listed in Enclosure 2 are forms not under DON control. These forms should be reviewed and justified by the appropriate DoD level forms manager as part of the DoD SSN Reduction Plan. Recommend deleting these forms as examples of forms exposing SSNs.
3. The report made no mention that there has been a review process for all official forms and Information Technology (IT) systems registered in the DITPR DON data base. These longstanding review processes ensure that when SSNs are collected, a System of Records Notice (SORN), a Privacy Act Statement (PAS) and or a Privacy Impact Assessment (PIA) are generated, reviewed, and approved by higher authority before disclosure to the public. The process cites legal authorities that allow SSN collection, the purpose of collection, and afford the public a means to review, challenge and amend inaccuracies of information protected under the Privacy Act. While these measures may have been inadequate, there was no indication that the examples of forms under DON control were exposing SSNs unnecessarily, only that SSNs collected had not been justified for continued use. Recommend that the Audit Team provide documentation that SSNs were collected unnecessarily.
4. In paragraph 4, page 6. DON Systems, the statement, "We also found that 3,814 of 4,936 (77.3 percent) inactive systems in the DoD Information Technology Portfolio Registry- DON did not identify if they collected SSNs." Recommend deleting this finding as inactive systems are not operational or are duplicative of other active systems. These systems must meet archive criteria and all storage media must be disposed of in accordance with DON disposal policies. Additional disposal guidance with the revision of the DON Remnance Manual is forthcoming.
5. In paragraph 4, page 7, DON Forms, the Audit states, "Phases 2 and 3 were designed to consolidate the command-level forms and to determine if Echelon II-level forms could be combined for use among multiple commands at the DON-level." However, phases 2 and 3 were postponed in August 2009 because there was no DON SSN Reduction Plan. Recommend deleting this finding as the DON Forms Manager disputes this claim.
6. The key enabler to reducing use of the SSN is the identification and authorization for use, of a suitable substitute for the SSN. Without a suitable substitute, business processes relying on a unique personal identifier, cannot be performed. Consequently, only portions of the DON SSN Reduction Plan could be implemented. The DoD SSN Reduction Plan is still in draft, pending further legal review and final component chop.

The release of this document is critical to DON implementation of an effective SSN reduction plan. Recommend the Audit acknowledge this critical enabler and modify statements that infer or state that DON has no overall guidance to reduce the collection of SSNs.

7. In paragraph 3.a. the statement, "On 30 October 2009, the Under Secretary of the Navy appointed the DON CIO as the Senior Military Component Official for Privacy" should be modified to read, "Pursuant to 44USC Ch 35, the Under Secretary of the Navy appointed the DON CIO as the Senior Military Component Official for Privacy on 30 October 2009."

Comments on NAVAUDSVC Recommendations:

NAVAUDSVC Recommendation 1:

Finalize, issue, and execute overall Department of the Navy guidance to reduce the collection of Social Security numbers (SSN) that includes, but is not limited to, systems, applications, Web sites, forms, letters, emails, and memos.

DON Response:

Concur. Action will require the release of the DoD SSN Reduction Plan Instruction due for final DoD component review January 2011. Final DON plan to be completed within 90 days of release of DoD SSN Reduction Plan.

NAVAUDSVC Recommendation 2:

Establish milestones and a mechanism for monitoring progress of the overall Department of the Navy Social Security Number Reduction guidance.

DON Response:

Concur. Action will be included in DON SSN Reduction Plan. Final DON plan to be completed within 60 days of release of DoD SSN Reduction Plan.

NAVAUDSVC Recommendation 3:

Submit a system change request to the Department of the Navy Application and Database Management System Configuration Control Board requiring the "SSN" and "Ident Info" fields in the Department of Defense Information Technology Portfolio Registry-Department of the Navy be populated.

DON Response:

Concur. System change request completed and implemented October 2010.

NAVAUDSVC Recommendation 4:

Establish a process to ensure that systems already registered in Department of Defense Information Technology Portfolio Registry-Department of the Navy have properly populated the "SSN" and "Ident Info" fields, and establish a timeline for implementation.

DON Response:

Concur. Action completed December 2010.

NAVAUDSVC Recommendation 5:

Establish a database that records all Department of the Navy forms that collect Social Security numbers of Department of the Navy personnel.

DON Response:

Concur. Action completed. DON forms managers were directed by DEPARTMENT OF THE NAVY SOCIAL SECURITY REDUCTION PLAN FOR FORMS PHASE 1, 192101Z JUL 10 DON CIO Washington DC DONCIO to post all official forms to Naval Forms Online (NFOL) at: <https://navalforms.daps.dla.mil/>

NAVAUDSVC Recommendation 6:

Issue a Department of the Navy policy to require that Department of the Navy forms that collect Social Security numbers at all echelons be included in the database established in Recommendation 5.

DON Response:

Concur. Action completed with release of DEPARTMENT OF THE NAVY SOCIAL SECURITY REDUCTION PLAN FOR FORMS PHASE 1, 192101Z JUL 10 DON CIO Washington DC DONCIO. Policy states that forms managers must post all official forms including those that collect SSNs, to NFOL. Posting is currently in progress.

NAVAUDSVC Recommendation 7:

Issue a Department of the Navy policy to require that all form managers identify whether forms collect Social Security numbers, and include Social Security number justifications in the database established in Recommendation 5.

DON Response:

Partially concur. NFOL already has SSN and Privacy Act Statement (PAS) metadata fields. Concur that NFOL add a checkbox to indicate date justifications were completed. Justification forms will be kept with the form history files and the record copy uploaded to the official Navy or Marine Corps records management solution. Adding a checkbox to NFOL will be completed by July 2011. DON CIO and the Director Navy Directives and Records Management non-concur with uploading justification forms to NFOL. Justifications are an internal government requirement and because NFOL is a public facing website there may be sensitivities that should not be shared with the public. Additionally, the cost of program changes to NFOL that would be required are not warranted since each Service already has a records management tool designed for this purpose.

NAVAUDSVC Recommendation 8:

Establish milestones and a mechanism for monitoring progress of Recommendations 6 and 7.

DON Response:

Concur. DON CIO will issue additional guidance establishing a mechanism for monitoring progress whereby: 1. All new and existing official DON forms are registered in NFOL; 2. All

new and existing forms that collect SSNs have an approved justification for continued SSN use are posted to NFOL.

NAVAUDSVC Recommendation 9:

Issue a Department of the Navy policy to limit exposure of Social Security numbers and other personally identifiable information wherever used; require exposure be justified to the Department of the Navy Senior Military Component Official for Privacy; and establish milestones and a reporting mechanism for results.

DON Response:

Partially concur. Concur with issuing a DON policy to limit exposure of SSNs and other personally identifiable information and the establishment of milestones to include a reporting mechanism. However, these actions are addressed in Recommendations 1 and 2, respectively.

Non-concur with requiring exposure of SSNs and other PII be justified to the Department of the Navy Senior Military Component Official for Privacy. Per the DTM-07-015 USD (P&R) "justifications shall be reviewed by the DoD Component wide forms Manager for component wide forms and the command and installations forms manager for command and installation forms, justification shall be reviewed at least one administrative level above the senior signing official." DEPARTMENT OF THE NAVY SOCIAL SECURITY REDUCTION PLAN FOR FORMS PHASE 1, 192101Z JUL 10 DON CIO Washington DC DON CIO also established a review process that does not include the DON Senior Military Component for Privacy. Such a review is unnecessary and would require unfunded staffing resources. Additionally, justification of SSN use in memos, emails, spreadsheets etc., where data collection is unstructured and not registered to an authoritative database is not feasible. While these media present potential misuse and unnecessary collection of the SSN, DON CIO will issue policy guidance that will address personnel accountability and training.

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