



Department of Veterans Affairs (VA) SSN Fraud Prevention Act of 2017 – Exemption Request

VA is committed to protecting the personal information such as name, address, phone number, Social Security Numbers (SSN), etc. of all Veterans and their beneficiaries. In accordance with the SSN Fraud Prevention Act of 2017, VA has taken the necessary steps to reduce and eliminate the use of SSN on documents sent by mail where feasible. Due to unique legal requirements and business needs across the Department, the SSN on documents sent by mail for all documents cannot be completely eliminated or truncated. Therefore, VA has developed regulations to determine the continued usage and exemption requirements for SSN on documents sent by mail. The Social Security Number Reduction (SSNR) Program Management Office seeks to coordinate activities to reduce the unnecessary usage of SSNs across the Department where feasible.

Organization:

Office of Management / Debt Management Center (OM/DMC)

Sub-Organization:

Office of Finance - Debt Management Center

Date Submitted:

July 28, 2022

Point of Contact(s):

Edward Bernard – edward.bernard@va.gov & Joe Schmitt – joseph.schmitt2@va.gov

This document acknowledges, the below list of documents requesting exemptions in accordance with Federal legislation and VA Policy, have been reviewed and analyzed.

Chief Privacy Officer (CPO)



Exemption Requirements

VA Administrations and Staff Offices submitted requests for exemptions to the SSNR Program Management Office for review. The SSNR PMO team has analyzed the documents submitted and have determined that they meet the following exemption requirements which include:

Per AUTHORITY: 38 U.S.C. 5101 of proposed VA regulation RIN 2900-AR19¹, the exemption reason for the documents listed below.

- **Truncation of the social security number is not feasible, due not being able to identify a specific individual where no adequate substitute is available.**

List of Documents Requesting Exemptions

Office of Management / Debt Management Center (OM/DMC) has submitted the following (68) documents that include the SSN outgoing by mail. Office of Finance - Debt Management Center has requested the following documents continue to include the SSN.

VA Administration	Document Title	Identifying Number	Brief Description
OM	071	FL-4566a	Accounts suspended because of active military deployment in Iraq or Afghanistan (w/rights)
OM	072	FL4-566b	Accounts suspended because of active military deployment in Iraq or Afghanistan
OM	100	FL4-413	First collection letter on terminated education account
OM	1003	FL4-413-3	Same as above with power of attorney (POA) copies
OM	100A	FL4-413A	First collection letter on terminated compensation or pension account
OM	100A3	FL4-413A-3	Same as above with POA copies
OM	100B	FL4-568	First collection letter on active 75B school debts with term dates
OM	100C	FL4-569	First collection letter on active education individual debt
OM	100C3	FL4-569-3	Same as above with POA copies
OM	100D	FL 4-587	First collection letter on vendor debts

¹ Proposed Rule RIN. 2900-AR19 (Oct. 06, 2021); 86 FR 55547.

VA Administration	Document Title	Identifying Number	Brief Description
OM	101	FL4-474A	First collection letter on active education account
OM	1013	FL4-474A3	Same as above with POA copies
OM	101A	FL4-474B	First collection letter on active compensation or pension account.
OM	101A3	FL4-474B-3	Same as above with POA copies
OM	102	FL4-419	First collection letter on education special payment
OM	1023	FL4-419-3	Same as above with POA copies
OM	102A	FL4-419A	First collection letter on compensation or pension special payment
OM	102A3	FL4-419A-3	Same as above with POA copies
OM	106	FL4-475	First collection letter on loan guaranty case
OM	1063	FL4-475-3	Same as above with POA copies
OM	106A	FL4-523	First collection letter on loan guaranty case w/o waiver rights
OM	109	FL4-439A	Conversion letter used when DMC first started charging interest
OM	112	FL4-469	Letter used at interest conversion stating interest will be charged if payment not rec'd within 30 days
OM	117	FL4-415A	Second collection letter
OM	117A	FL4-573	Second collection letter - CH33 school debt (75)
OM	117B	FL4-588	Second collection letter - vendor
OM	122	FL4-501	Letter advising that debt has been referred to CRA's
OM	123	FL4-503A	Letter advising that debt will be referred to TOP if payment arrangements are not made
OM	123A	FL4-577	Letter advising school that debt will be referred to Treasury Offset Program (TOP) if payment arrangements are not made

VA Administration	Document Title	Identifying Number	Brief Description
OM	123B	FL4-589	Letter advising vendor that debt will be referred to TOP if payment arrangements are not made
OM	130	FL4-468A	Letter advising that debt has been increased where interest and admin costs could be present
OM	130A	FL4-468B	Letter advising increase in education debt without interest - advises of interest and admin if not paid
OM	130B	FL4-468C	Letter advising increase in debt - Compensation and Pension debts
OM	130C	FL4-538	Letter advising of increase - Loan Guarantee debts
OM	130D	FL4-552A	Letter advising of increase due to benefit adjustment - could be repay or offset cases
OM	130E	FL4-575	Letter advising of increase due to benefit adjustment - 75B school debts
OM	130F	FL4-585	Letter advising of increase due to benefit adjustment - 12 month repay
OM	130G	FL4-590	Letter notifying vendor of a debt increase
OM	145	FL4-533	Letter advising we plan to refer the debt to CAIVRS
OM	430	FL4-452	Letter on suspended education account stating we have no record of reentry in school
OM	431	FL4-454	Letter advising we will suspend collection of education debt until debtor reenter school
OM	440	FL4-450A	Letter on suspended interest-bearing account stating suspension period is over
OM	440A	FL4-450B	Letter on non-interest-bearing account stating that suspension period is over
OM	442	FL4-449A	Letter approving suspension of collection on interest bearing account
OM	442A	FL4-449B	Letter approving suspension of collection on non-interest-bearing account

VA Administration	Document Title	Identifying Number	Brief Description
OM	450	FL4-565B	CH 30/1606/1607 Letter on suspended education account stating we have no record of reentry in school
OM	453	FL4-565A	CH 30/1606/1607 Letter advising we will suspend collection of education debt until debtor reenter school
OM	486	FL4-556	Letter to representative of estate on death case, usually send after researching 550 reason code
OM	492	FL4-511	Notification to representative of estate requesting payment in full
OM	600	FL4-447A	Letter accepting repay plan on education debt where interest and admin costs have accrued
OM	600A	FL4-447B	Letter accepting repay plan on other than education debt
OM	600B	FL4-447C	Letter accepting repay plan on home loan guaranty debt where interest and admin costs have accrued
OM	602	FL4-557	Letter accepting repay plan by withholding benefits
OM	603	FL4-418	Letter on delinquent repay plan for education debt where admin costs have not yet accrued
OM	603A	FL4-418B	Letter on delinquent repay plan for education debt where admin costs have not yet accrued
OM	607	FL4-541	Letter advising scheduled offset of benefits did not occur - need to repay the debt
OM	609	FL4-5224	Payment receipt generated when payment is applied
OM	609A	FL4-528	Payment receipt on cases where payment was applied but account is not in repay status
OM	609B	FL4-576	Payment receipt on cases where payment was applied for 75B debt
OM	609C	FL4-578	Payment receipt on cases where payment was applied for 75B debt

VA Administration	Document Title	Identifying Number	Brief Description
OM	614	FL4-442A	Letter on education debt advising that other benefits are available for offset - gives scheduled offset date
OM	614A	FL4-442B	Letter on non-education debt advising that other benefits are available for offset - gives scheduled offset date
OM	655	FL4-581	Financial Status Report (FSR) request
OM	817	FL4-463B	Letter advising debtor they have a right to a hearing before we consider waiver request. Also solicits completed FSR
OM	819	FL4-464	Letter advising we cannot effectively consider waiver without completed FSR
OM	831A	FL4-526A	Letter advising that either waiver or appeal has been denied. If benefits are available, offset will begin in 60 days. If no benefits available, need to repay
OM	832A	FL4-527A	Letter advising partial waiver or appeal was granted, then language similar to letter above.
OM	9053	FL4-551A-3	Same as above with POA copies