



## 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:

Veterans Benefits Administration (VBA)

### Sub-Organization:

Compensation Service, Pension & Fiduciary Service and Office of Administrative Review

### Date Submitted:

July 28, 2022

### Point of Contact(s):

Ray Tellez – [Ray.Tellez@va.gov](mailto:Ray.Tellez@va.gov) & Vivian J. Bogue - [Vivian.Bogue@va.gov](mailto:Vivian.Bogue@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-AR19<sup>1</sup>, 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

Veterans Benefits Administration (VBA) has submitted the following (97) documents that include the SSN outgoing by mail. Compensation Service, Pension & Fiduciary Service and Office of Administrative Review has requested the following documents continue to include the SSN.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Withdrawal Agreement Letter	Notification of withdrawal agreement with the fiduciary, financial institution, and Department of Veterans Affairs Regional Office.
Pension & Fiduciary Service	N/A	VBMS Letter templates / paragraphs correspondences	Various VBMS letter templates correspondences for developmental pension benefits.
Compensation Service	NA	VBMS Core Development Letters	All letters generated by VBMS in development and sent to the Veteran & VSO
Pension & Fiduciary Service	N/A	Untimely NOD Letter	Notification to beneficiary about an untimely NOD.
Pension & Fiduciary Service	N/A	Untimely Form 9 Letter	Notification to beneficiary about the VA Form 9 not submitted on time to VA.
Pension & Fiduciary Service	N/A	Supervised Direct Pay Assessment	Notification to VSC and PMC that restoration of competency is appropriate.

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

Sub-Organization	Identifying Number	Document Title	Brief Description
Office of Administrative Review	None	Statement of the Case (SOC)/Supplemental Statement of the Case (SSOC)	This form is used for denial of benefits notification.
Pension & Fiduciary Service	N/A	SR Untimely Letter	Notification to beneficiary about untimely submit supplemental review.
Pension & Fiduciary Service	N/A	SR Notification Cover Letter	Notification of beneficiary about Supplement review, decision, and appeal.
Pension & Fiduciary Service	N/A	Spanish Accounting Call Letter (Past Due)	Notification to fiduciary accounting Past due (Spanish).
Pension & Fiduciary Service	N/A	SIA No Accounting Letter	Notification to subject fiduciary about an opened misuse investigation and the accounting periods under investigation.
Pension & Fiduciary Service	N/A	SIA Letter	Notification to fiduciary of replacement as fiduciary, to turn over remaining funds to the successor fiduciary, and accounting required.
Pension & Fiduciary Service	N/A	SDA Misuse Notification Letter	Notification to subject fiduciary about an opened misuse investigation and the accounting periods under investigation.
Pension & Fiduciary Service	N/A	Request to Reissue Misuse Funds Memorandum	Internal memo for misuse.
Pension & Fiduciary Service	N/A	Request Station Debt Info to SSD	Internal memo to SSD to request debt information for the misuse determination for beneficiary / fiduciary debt.
Pension & Fiduciary Service	N/A	Request for Revision of Misuse Debt Amount	Request revision of misuse debt amount.
Pension & Fiduciary Service	N/A	Reissuance Notification to Successor Fiduciary Letter	Notification to beneficiary about misuse determination and how the funds will be returned.
Pension & Fiduciary Service	N/A	Reissuance Beneficiary Notification Letter	Letter notifying beneficiary the amount of misused funds will be reimbursed to beneficiary.

Sub-Organization	Identifying Number	Document Title	Brief Description
Compensation Service	NA	RBPS Notification Letters (Grant, Deny, Grant/Deny, Military Retired Pay)	Letters generated by RBPS to notify claimants and VSOs of dependency decisions.
Pension & Fiduciary Service	N/A	Proposed Incompetency Letter	Notification letter for proposed incompetency.
Compensation Service	NA	Private Medical Records (PMR) Development Letters	<p>These letters are used to request private medical records from providers and to notify claimants of the actions taken by the VA on their behalf to perfect their claim. There are (14) Letters Total.</p> <ul style="list-style-type: none"> <li>1- Veteran Initial Letter</li> <li>2- Veteran Follow-up Letter</li> <li>3- Claimant Initial Letter</li> <li>4- Claimant Follow-up Letter</li> <li>5- Private Health Provider (PHP) initial</li> <li>6- PHP Follow-up</li> <li>7- Foreign Initial for Veteran</li> <li>8- Foreign Follow-up for Veteran</li> <li>9- Foreign Claimant Initial</li> <li>10- Foreign Claimant Follow-up</li> <li>11- Foreign PHP Initial</li> <li>12- Foreign PHP Follow-up</li> <li>13- Good Cause Letter for Veterans</li> <li>14- Good Cause Letter for Follow-ups</li> </ul>
Pension & Fiduciary Service	N/A	Precontact - VA Rating Letter	Notification to beneficiary about VA has determined they need assistance managing VA benefits.
Pension & Fiduciary Service	N/A	Precontact - Judicial No Rating Letter	Notification to beneficiary about a court determined they require assistance in managing financial affairs.
Pension & Fiduciary Service	N/A	Pension Automation letter templates / paragraphs correspondences	DIC and Burial letter templates correspondence.
Pension & Fiduciary Service	N/A	PCGL Letter templates / paragraphs correspondences	Various PCGL letter templates correspondences for award and developmental pension benefits.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Onsite Unscheduled Review Notification Letter	Notification about an unscheduled pending review for process.
Pension & Fiduciary Service	N/A	Onsite Review Findings Cover Page Letter	Notification about the findings and recommendations of the onsite review.
Pension & Fiduciary Service	N/A	Onsite Periodic Review Notification Letter	Notification to beneficiary about a fiduciary operations review.
Pension & Fiduciary Service	N/A	Non-SDA Misuse Notification Letter	Notification to subject fiduciary about an opened misuse investigation.
Pension & Fiduciary Service	N/A	Negligence Payment Recoupment Letter	Notification to Fiduciary about misuse amount and where to send payment back to VA within 10 days.
Pension & Fiduciary Service	N/A	Negligence Determination Beneficiary Notification Letter	Notification to beneficiary about completed negligence determination regarding benefits payment, what is decided, how decision made, and appeals paragraphs.
Pension & Fiduciary Service	N/A	Misuse Notification to Successor Fiduciary Letter	Fid Hub received allegation that fiduciary involved in misuse by investing and determined the amount of misuse.
Pension & Fiduciary Service	N/A	Misuse Notification to Successor Fiduciary (Recon-Rev) Letter	Notification to fiduciary about misuse determination and the amount.
Pension & Fiduciary Service	N/A	Misuse Notification to Subject Fiduciary Reconsideration Letter	Letter to fiduciary stating there has been a change in the misuse dollar amount.
Pension & Fiduciary Service	N/A	Misuse Notification to Subject Fiduciary Letter	Notification to fiduciary about received allegation about found misuse of beneficiary payments.
Pension & Fiduciary Service	N/A	Misuse Notification Letter to Subject Fiduciary (Recon-Revised)	Letter to fiduciary stating there has been a change in the misuse dollar amount.
Pension & Fiduciary Service	N/A	Misuse Notification Letter to SSA	Notification to SSA about subject fiduciary misuse of VA funds.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Misuse Notification Letter to Court	Notification to subject fiduciary about misuse investigation for misuse determination.
Pension & Fiduciary Service	N/A	Misuse Notification Letter to Beneficiary (Recon-Revised)	Letter to beneficiary stating that there has been a change in the misuse dollar amount.
Pension & Fiduciary Service	N/A	Misuse Notification Letter to Beneficiary - New Appeal Language	Notice to the beneficiary that the fiduciary has misused the beneficiary's VA benefit.
Pension & Fiduciary Service	N/A	Misuse Determination Reconsideration Memo	Internal document used for information about misuse determination facts.
Pension & Fiduciary Service	N/A	Misuse Determination Memo	Memo instructing the fid hub how to draft a misuse memorandum.
Pension & Fiduciary Service	N/A	Misuse Determination Corrected Memo	Memo instructing the fid hub how to draft a misuse corrected memorandum.
Pension & Fiduciary Service	N/A	Misuse Beneficiary Recon Notification Letter - New Evidence	Notification to beneficiary about misuse investigation, explains determination, reconsideration, appeals, and new evidence received.
Pension & Fiduciary Service	N/A	Minor Notification Letter	Notification to Fiduciary for minor beneficiary of changes in expenditures based on a follow-up field examination.
Pension & Fiduciary Service	N/A	Minor Beneficiary No Appointment Letter	Notification to Fiduciary for minor beneficiary for expenditures established based on a new appointment.
Compensation Service	NA	MAP-D Development Letters	All letters generated by MAP-D though used almost exclusively for Pension and Fiduciary processing contain the SSN of the Veteran
Pension & Fiduciary Service	N/A	Locate Fiduciary Mailing Address Update Letter	Notification to fiduciary to locate their whereabouts for a required follow-up field examination.
Pension & Fiduciary Service	N/A	Locate Beneficiary Letter	Notification to beneficiary to locate their whereabouts for a required field examination.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Justification for Revision of Amount of Misuse Debt	Internal memo for misuse reconsideration or an appeal.
Pension & Fiduciary Service	N/A	Investigation Complete to Subject Fiduciary on Approved Accounting Letter	Notification to subject fiduciary about approved accounting that was under investigation.
Pension & Fiduciary Service	N/A	IA Fiduciary Notification Letter	Notification to fiduciary about field examiner and monthly expenses.
Pension & Fiduciary Service	N/A	IA Beneficiary Notification Letter	Notification to beneficiary of fiduciary selection and informing the beneficiary of their rights.
Pension & Fiduciary Service	N/A	HLR Untimely Letter	Notification to beneficiary about submitting HLR untimely.
Pension & Fiduciary Service	N/A	HLR Notification Cover Letter	Notification to beneficiary about HRL and what was decided.
Pension & Fiduciary Service	N/A	HLR Incomplete Letter	Notification to Fiduciary NOD regarding bond payable is not appealable.
Pension & Fiduciary Service	N/A	HLR Evidence Received Letter	Notification to beneficiary about submitting an HLR.
Pension & Fiduciary Service	N/A	Fund Usage Review Complete Letter	Notification to fiduciary of approved review of management of VA benefits and no further actions required.
Pension & Fiduciary Service	N/A	Fund Usage Past Due Letter	Notification to fiduciary about financial statements are past due, where to submit, and if you don't submit.
Pension & Fiduciary Service	N/A	Fund Usage Due Letter	Notification to fiduciary about financial statements are due, where to submit, and if you don't submit.
Pension & Fiduciary Service	N/A	Fund Usage Due Date Extension Letter	Notice letter to the fiduciary that the fund usage review is due from the fiduciary.
Pension & Fiduciary Service	N/A	Fund Usage Additional Evidence Required Letter	Notification to fiduciary about financial statements due in 14 days, where to submit, and if you don't submit.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Fraud Prevention Attachment	Fraud prevention document about contacting the VA to prevent fraud.
Pension & Fiduciary Service	N/A	Fiduciary Direct Deposit Letter	Letter to fiduciary explaining the requirement of a properly titled account for VA benefit.
Pension & Fiduciary Service	N/A	Fiduciary Commission Notification Letter	Notification letter explaining that fiduciary is entitled to take a fee for services.
Pension & Fiduciary Service	VA Form 21P-4703	Fiduciary Agreement	Agreement between VA and potential fiduciary which outlines responsibilities.
Pension & Fiduciary Service	N/A	Federal Spanish Accounting Call Letter	Notification to court appointed fiduciary accounting due soon (Spanish).
Pension & Fiduciary Service	N/A	Federal or Court Past Due Accounting Letter	Notification to fiduciary accounting delinquent for federal or court accounting.
Pension & Fiduciary Service	N/A	Federal Accounting Due Letter	Notification to fiduciary annual accounting coming due.
Pension & Fiduciary Service	N/A	FB Fiduciary Notification Letter	Notification that the fiduciary continues to be appointed as fiduciary for a beneficiary.
Pension & Fiduciary Service	N/A	Disapproved Letter	Notification to fiduciary of accounting was disapproved and reasoning.
Pension & Fiduciary Service	N/A	Disapproval Second Follow-up Letter	Notification to fiduciary of disapproved second follow up annual accounting.
Pension & Fiduciary Service	N/A	Disapproval Follow-up Letter	Notification to fiduciary that accounting was disapproved and reasoning.
Pension & Fiduciary Service	N/A	Deceased Beneficiary Memorandum	Internal memo when VA cannot reissue misused benefits to a deceased beneficiary.
Pension & Fiduciary Service	N/A	Deceased Bene - No Accounting Letter	Notification to the fiduciary acknowledging the death of beneficiary and explaining no final accounting is due.
Pension & Fiduciary Service	N/A	Debt Memo to Support Services Division (SSD)	Internal memo for debt to be established for misuse of funds to the Support Services Division



Sub-Organization	Identifying Number	Document Title	Brief Description
			(SSD) Finance Section for funds misused.
Pension & Fiduciary Service	N/A	Death Final Accounting Letter - Overpayment	Notification of beneficiary death and overpayment information for accounting.
Pension & Fiduciary Service	N/A	Death Final Accounting Letter - No Overpayment	Notification of beneficiary death and no overpayment information for accounting.
Pension & Fiduciary Service	N/A	Death - NOK Letter	Notification letter with no final accounting from the fiduciary required.
Pension & Fiduciary Service	N/A	Court Spanish Accounting Call Letter	Notification to fiduciary accounting due (Spanish).
Pension & Fiduciary Service	N/A	Court Accounting Due Letter	Notification to fiduciary of court approval accounting and list next accounting period.
Pension & Fiduciary Service	N/A	Court Accounting Approval Letter	Notification to VSC and PMC that restoration of competency is appropriate.
Pension & Fiduciary Service	N/A	Bond Request Letter	Request to fiduciary to obtain and provide a copy of a bond.
Pension & Fiduciary Service	N/A	Bond Exonerate Letter	Notification of no need for a bond.
Pension & Fiduciary Service	N/A	Beneficiary Notification SDP Letter	Notification to Beneficiary of expenses following appointment to supervised direct pay.
Pension & Fiduciary Service	N/A	Beneficiary Notification (No Appointment) Letter	Notification to beneficiary of non-selection of their chosen fiduciary.
Pension & Fiduciary Service	N/A	Beneficiary Fee Notice Letter	Notification to beneficiary of fee received by fiduciary to manage funds.
Pension & Fiduciary Service	N/A	Beneficiary Bond Notification Letter	Notification to beneficiary about the bond.
Pension & Fiduciary Service	N/A	Bank Letter Fiduciary	Notification to third party requesting fiduciary address.

Sub-Organization	Identifying Number	Document Title	Brief Description
Pension & Fiduciary Service	N/A	Bank Letter Beneficiary	Notification to third party requesting beneficiary address.
Pension & Fiduciary Service	N/A	Bad Credit Letter	Notification to proposed fiduciary of non-selection based on bad credit.
Pension & Fiduciary Service	N/A	AW Second Notice	Second follow-up with fiduciary to obtain corrected annual accounting.
Pension & Fiduciary Service	N/A	Approved Accounting Letter	Notification of approval of annual Federal accounting.
Pension & Fiduciary Service	N/A	Annual Written Contact Letter	Notification to beneficiary about the VA fiduciary program and rights in the program.
Pension & Fiduciary Service	N/A	Age of Majority (Minor) Letter	Notification of minor child turning 18, to turn over funds to child.
Pension & Fiduciary Service	N/A	Age of Majority (Fiduciary) Letter	Notification to minor of being removed from Fiduciary Program and remaining funds turned over to majority.
Pension & Fiduciary Service	N/A	Accounting Extension Letter	Notification of fiduciary approved extension for accounting.