



FEDERAL MARITIME COMMISSION

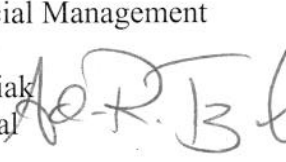
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Office of Inspector General

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TO: Karon Douglass, Director
Office of Financial Management

FROM: Adam R. Trzeciak
Inspector General 

SUBJECT: Privacy Data on Leave Request Forms
OIG Operational Review OR-06-01

As I am sure you are well aware, privacy concerns in the Federal government have never been greater. The OIG has received many recent mandates to examine agency controls to safeguard personally identifiable information (PII) maintained on agency data bases. In a majority of instances, PII is necessary to assist the agency in carrying out its programs or managing its employees efficiently and effectively. In other instances, collecting PII is simply an outgrowth of tradition or habit, with no current program or administrative basis.

On July 13, 2006, I sent you an email concerning the agency's need to collect privacy data, specifically the social security number on Form SF-71, *Request for Leave or Approved Absence*, (a.k.a. leave slip). In a recent audit of payroll transactions¹, the OIG learned that social security numbers are not used by FMC timekeepers to record leave or by FMC supervisors to approve leave. As stated in my July 13th email, my concern was, and continues to be, that the agency collects this sensitive information on leave slips for no reason at all. This practice exposes FMC employees to identity theft should this information fall into the wrong hands. I suggested that you inform staff that the social security number is not needed to process leave slips and that staff discontinue providing this information for their own protection.

In your response, you stated that you no longer use your social security number on leave slips you submit and consider it (including the social security number) a personal decision. You also stated that you know of no supervisors who require that the social

¹ See OIG 06-02, *Audit of FMC Time and Attendance Transactions*

security number be included on the leave slip. You concluded that no action was necessary.

Based on this correspondence, I decided to test the extent to which staff is including social security numbers on leave slips. The OIG selected 14 employees representing most FMC offices and bureaus, documented leave taken by these employees for all of CY 2005 and the first nine pay periods of 2006 and examined accompanying leave slips. Of the 14 employees reviewed, nine (64 percent) routinely included their social security numbers on their leave slips. In total, the OIG identified 148 separate leave slips (belonging to the nine employees) containing a social security number. All of these forms are currently maintained by various agency timekeepers.

While including the social security number may indeed be a personal decision, I suspect most staff is unaware that it is not needed to process leave transactions.

Approximately two years ago, I recommended that the Chief Financial Officer at the Federal Trade Commission, the Federal agency responsible for enforcing many of the government's privacy statutes and for issuing related guidance to businesses and the public on privacy matters, discontinue the collection of social security numbers on forms where they are no longer needed. In response, the FTC immediately blocked out the social security data field on its "on-line" leave slip and instructed staff not to include such information when completing the form manually. In light of the OIG survey results, I recommend that you take the same steps to protect FMC staff's PII. I am also recommending that the Director, Office of Administration, review all other forms used by the agency (e.g., training forms, travel documents, etc.) to identify instances where social security numbers are collected but not used to process the specific transaction.

Responses to the two recommendations are due to the Office of Inspector General by September 5, 2006. Results of this review and your responses will be included in the OIG's annual Federal Information Security Management Act report to Congress and OMB for FY 2006.

cc: Director, Office of Administration
Chief Information Officer
Director, Office of Human Resources
FMC Privacy Act Officer