



U.S. DEPARTMENT OF THE INTERIOR
Office of the Secretary
National Business Center



November 16, 2007

To: All Quarters Management Information System (QMIS) Users

From: QMIS System Manager, DOI, NBC

Subject: Elimination of Social Security Numbers (SSN) from QMIS - REVISED

Data security has become increasingly crucial to the Federal government. The Office of Management and Budget (OMB) memorandum issued in May 2007, requires all Federal agencies to eliminate the unnecessary use and collection of SSN data in their systems by November 2008

(<http://www.whitehouse.gov/omb/memoranda/fy2007/m07-16.pdf>.)

In the course of the 2007 OMB Circular A-130 Certification and Accreditation of QMIS, and a separate independent review performed by the MITRE Corporation, both determined the storage of SSN data in QMIS databases was not necessary, incurred substantial risk, and recommended it be removed. In order to be in compliance with OMB, and more importantly, to reduce the risk incurred by our housing program, we are eliminating the SSN field located on the Tenant tab and in the database and replacing it with a randomly-generated unique identifier. Records already stored in your database on past and current tenants will remain intact without the SSN data field.

We understand this change may impact existing business practices. These procedures should be reviewed and modified if necessary. This is a relatively minor inconvenience compared to the considerable costs and public embarrassment your agency would bear with any loss or unauthorized access of SSN data stored in a QMIS database. By eliminating this data in QMIS, we are trying to protect you and your tenants from a potentially disastrous security breach.

The QMIS Office has devoted considerable resources to remove this risk. This risk will be eliminated when the 2008 QMIS software (yet to be released) is properly installed, using the installation procedures provided by the QMIS Office (yet to be published). The QMIS Office will support users with the installation, but we cannot know all hard-drives, jump-drives, and other external devices (e.g. CD backups) that exist in every user's network, nor which databases are obsolete and should be deleted. For this reason, we recommend that your IT resources provide local knowledge and support to users in "cleaning up" this

data. To assist with this "clean up" we **require** the following procedures be done **prior** to installing the 2008 QMIS software:

1. Search **all** hard drives, both local and network, for **all** QMIS databases. QMIS databases have the same naming syntax, *xxxx_QMIS.mdb*, where *xxxx* is your installation's unique identifier. A complete search can easily be done by using **_QMIS.mdb* as the search criteria.
2. Identify the current QMIS database(s) and **delete all others!** Note: some users may manage more than one installation and have multiple current databases. However, there should only be one database per installation.
3. If the current QMIS database is still in the Microsoft Access 97 format then it will need to be converted to the latest version of MS Access that is loaded on your machine, i.e., 2000, 2002, 2003. IT staff will know how to do this or the QMIS Help Desk (303-969-5696) can assist.
4. Search **all** hard drives, both local and network, for **all** QMIS SEND files. QMIS SEND files have the same naming syntax, *xxxx_SEND.cab*, where *xxxx* is your installation's unique identifier. A complete search can easily be done by using **_SEND.cab* as the search criteria. These SEND files are simply compressed versions of the database and contain SSNs.
5. **Delete all SEND files!** New SEND files will need to be created prior to the 2008 data roll-up.
6. Delete all QMIS databases and SEND files that exist on any jump drives, CDs, DVDs, backup tapes or any other storage device other than the local and network hard drives.

Beginning January 2008, no QMIS database should be transmitted via email or postal mail that has not been sanitized of SSN data. This includes transmissions within your own agency. **Data sent to the QMIS Office with SSN data will be reported to the responsible Agency and DOI Security!** Please note: even though following the procedures outlined in this memorandum will cleanse your database of all SSN data, the policy issued January 23, 2006 regarding the encryption and password protecting of SEND files using WinZip software is still in effect until further notice.

The release of the new QMIS software, with installation instructions, will be forthcoming the first week of January 2008.

Questions can be directed to the QMIS Help Desk, at 303-969-5696.