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AAHS-ZA

7 JUL 2017

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Use of the Social Security Number in Army Forms and IT Systems

1. Reference DoDI 1000.30 (Reduction of Social Security Number (SSN) Use within DoD).
2. The Army is required to minimize the collection and use of Social Security Numbers (SSNs) as a unique personal identifier for individuals. Use of the SSN includes the SSN in any form, including, but not limited to, truncated (last four digits), masked, partially masked, encrypted, or disguised SSNs. When the SSN is used on forms and in IT systems, a SSN justification memo must be prepared in accordance with DoDI 1000.30. The enclosed guide reiterates existing DoD policies and provides samples to assist action officers tasked with preparing justifications.
3. The SSN is often the basis for identity theft. Use of the SSN must be closely evaluated to determine if it is necessary to accomplish the mission. Wherever possible, Army forms and IT systems should transition to an alternative unique personal identifier such as the DoD ID number. When the SSN is necessary, the appropriate administrative, physical, and technical safeguards must be implemented to prevent unauthorized disclosure of the SSN.
4. My points of contact for this program are Mrs. Tracy Rogers, 703-428-6513/[tracy.c.rogers2.civ@mail.mil](mailto:tracy.c.rogers2.civ@mail.mil) and Ms. Meshell Berry, 703-428-6185/[cozenja.m.berry.civ@mail.mil](mailto:cozenja.m.berry.civ@mail.mil).

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# SOCIAL SECURITY NUMBER (SSN) JUSTIFICATION GUIDE

U.S. ARMY RECORDS MANAGEMENT AND DECLASSIFICATION AGENCY,  
ARMY PRIVACY AND CIVIL LIBERTIES OFFICE  
JUNE 1, 2017



*“Protecting privacy in the collection and handling of this information is fundamental to the successful accomplishment of the Government’s mission. The proper functioning of Government requires the public’s trust, and to maintain that trust the Government must strive to uphold the highest standards for collecting, maintaining, and using personal data. Privacy has been at the heart of our democracy from its inception, and we need it now more than ever.”*

*- Executive Order 13719, Establishment of the Federal Privacy Council*

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# OVERVIEW

## USE OF THE SOCIAL SECURITY NUMBER IN DOD

The Department of Defense has routinely used the Social Security Number (SSN) as a primary personal identifier for individuals. The increased use of the SSN has enabled information systems and processes to interoperate and transfer information with greater accuracy. Unfortunately, due to the risk of identity theft, the continued use of the SSN in such a manner is unacceptable as it creates a vulnerability for the individual. Use of the SSN includes the SSN in any form, including, but not limited to, truncated (last four digits), masked, partially masked, encrypted, or disguised SSNs. The use of the SSN shall be limited to processes that specifically require the presentation of the SSN to meet a legal or regulatory requirement (law, Executive Order, or regulation). Most applications that require the SSN for specific processes do not require its use for every activity. Use of the SSN must be evaluated to determine if it is necessary to accomplish the mission.

The requirement that all Federal agencies evaluate and eliminate the unnecessary use of the SSN was initiated in the [President's Task Force on Identity Theft Strategic Plan](#). The mandate to implement procedures to eliminate the unnecessary use of the SSN is stipulated in [OMB Circular No. A-130, Managing Information as a Strategic Resource](#). DoD policy and implementation guidance is detailed in [DoDI 1000.30, Reduction of Social Security Number \(SSN\) Use Within DoD](#). The Army policy on protecting the SSN is stated in [AR 25-22, The Army Privacy Program](#).

This guide is provided to assist Army personnel with preparing SSN justification memos. It is intended to supplement DoD guidance and to provide a better understanding as to why the Army must minimize the use of SSNs wherever possible. Please be advised that changes to Federal and DoD policies or the prescribing directives may impact the guidance presented in this document.

Questions or comments regarding this guide may be directed to the Army Privacy Office at (703) 428-7499 or [usarmy.belvoir.hqda-oaa-ahs.mbx.army-privacy-sorn-ssn-reduction@mail.mil](mailto:usarmy.belvoir.hqda-oaa-ahs.mbx.army-privacy-sorn-ssn-reduction@mail.mil).



# FREQUENTLY ASKED QUESTIONS



EXCERPTS FROM DODI 1000.30 HAVE BEEN INCLUDED IN TEXT BOXES FOR QUICK REFERENCE. PLEASE SEE DODI 1000.30 FOR THE FULL CONTEXT AND TO REVIEW THE ENCLOSURES AND REFERENCES THAT ARE SPECIFIED IN THESE EXCERPTS. PLEASE NOTE THAT CHANGES TO FEDERAL AND DOD POLICIES OR THE PRESCRIBING DIRECTIVES MAY IMPACT THE GUIDANCE PRESENTED IN THIS DOCUMENT.

## 1. WHAT IS DOD'S POLICY ON THE COLLECTION AND USE OF SSNS?

In accordance with DoDI 1000.30, any use of the SSN that cannot be justified through appropriate authorities must be eliminated.

### DoDI 1000.30:

"POLICY. It is DoD policy that:

- a. All DoD personnel shall reduce or eliminate the use of SSNs wherever possible.
- b. Use of the SSN includes the SSN in any form, including, but not limited to, truncated, masked, partially masked, encrypted, or disguised SSNs.
- c. SSNs shall not be used in spreadsheets, hard copy lists, electronic reports, or collected in surveys unless they meet one or more of the acceptable use criteria in Enclosure 2.
- d. SSNs shall be used in approved forms and systems when they meet one or more of the acceptable use criteria in Enclosure 2.
- e. Specific reviews of forms and systems shall be conducted to reduce SSN use. See Enclosures 3 and 4 for review procedures."

# FREQUENTLY ASKED QUESTIONS

## 2. WHAT ALTERNATIVES CAN BE USED IN PLACE OF THE SSN?

As mandated in OMB Circular No. A-130, DoD has established a policy for use of the SSN and guidance for reducing its unnecessary use. Alternatives to the SSN shall be used whenever possible. Examples of SSN Alternatives include DoD ID Numbers, employee number, system-specific identifiers, net-centric environment, and biometrics.

### DoDI 1000.30, Enclosure 2:

“(1) The DoD Identification Number will replace the SSN as the Geneva Conventions Serial Number for the United States as all DoD identification cards are updated through their natural lifecycle replacement. The DoD Identification Number is the common name for the Electronic Data Interchange Personal Identifier (EDI-PI).

(a) The EDI-PI is a unique personal identifier created within the Defense Enrollment Eligibility Reporting System (DEERS) for each person who has a direct relationship with DoD.

(b) The EDI-PI has previously been used as a system identifier and is present in many DoD enterprise systems.

(2) To support widespread use of the DoD Identification Number, it will be printed on all DoD identification cards. It is intended to support replacement of the SSN in most DoD processes and business needs. It shall not be used to replace the SSN in any case where the SSN is required by law.

(3) The DoD Identification Number shall only be used for DoD business purposes. This may include transactions that include entities outside DoD, so long as individuals are acting on behalf of or in support of the Department of Defense.

(a) For use in authentication transactions, an individual’s name and DoD Identification Number shall be treated as a single factor. When using an individual’s name and the DoD Identification Number for authentication, a second authentication factor must also be provided beyond the individual’s name and DoD Identification Number.

1. The DoD Identification Number shall not be, either by itself or in conjunction with the individual’s name, be considered sufficient for any level of authentication.

2. Presence or knowledge of an individual’s DoD Identification Number alone shall be considered as no more significant than presence or knowledge of that individual’s name. It does not constitute any level of authority to act on that individual’s behalf.”

# FREQUENTLY ASKED QUESTIONS

## 3. WHAT IS AN SSN JUSTIFICATION MEMO AND WHEN IS IT REQUIRED?

An SSN justification memo is submitted to the Army Privacy Office to validate the use of the SSN on any form or IT system. This includes, but is not limited to, truncated, masked, partially masked, encrypted, or disguised SSNs. SSN justifications must be submitted when a new requirement exists to collect the SSN, when the use has not previously been justified, and when DoD or Army policy requires a review and update.

### DoDI 1000.30, Enclosure 2:

“Any system, process, or form that collects, transfers, or retains personally identifiable information (PII) must properly document the authority for that use. This includes, but is not limited to, justification for the collection, retention, or use of the SSN. It is unacceptable to collect, retain, or transfer PII without such justification. The authorization for use of PII is governed through DoD Directive 5400.11 (Reference (j)). In addition to the documentation required for the use of PII, the use of the SSN as part of any collection, transfer, or retention must be specifically documented and justified. This documentation shall include justification in accordance with paragraph 2.c of this enclosure as well as any specific legislative requirements for use of the SSN.

Forms used to collect PII shall be coordinated in accordance with each DoD Component’s forms management process. The DD Form 67, “Form Processing Action Request,” submitted by the DoD Component to create or revise a form, shall provide the name, initials, office symbol, and telephone number of the coordinating DoD Component officer and the SORN number entered. Copies of the justification to collect PII and a SORN notice shall be included with the DD Form 67.”

## 4. IS THE SSN JUSTIFICATION MEMO IN THE CORRECT FORMAT?

Refer to DoDI 1000.30 Enclosure 4, page 20, the enclosed checklist and sample memos. The language should be simple and easy to follow. The approval process may include personnel who are not directly familiar with the form, system or program, therefore it is important to avoid jargon, acronyms, and technical terms.

## 5. WHAT MUST BE INCLUDED IN THE JUSTIFICATION MEMO?

The justification memo must identify the form, IT system, the System of Records Notice (SORN), authorities (law, Executive Order, DoD Directive/Instruction or Army Regulation) and safeguards implemented to protect the SSN.

# FREQUENTLY ASKED QUESTIONS

## 6. WHAT ARE THE DOD ACCEPTABLE USE CASES FOR THE SSN?

The acceptable uses are specified in DoDI 1000.30, Enclosure 2 (an excerpt has been incorporated in this document starting on page 13). Carefully read the acceptable uses to identify if one is applicable. The inclusion of multiple acceptable uses does not increase the likelihood of approval. Approval is granted based on providing the appropriate authorities and a solid justification for the acceptable use case.

## 7. WHAT IF THE FORM OR IT SYSTEM REQUIRES USE OF THE SSN BECAUSE IT INTERFACES WITH ANOTHER SYSTEM?

A form or IT system may not be able to transition from the SSN to another identifier in a timely manner due to an interface with a legacy system that still uses the SSN. The continued use of the SSN may be acceptable for a specified period of time, provided that a formalized elimination plan with a timeline is in place for the migration away from using the SSN in the future. The elimination plan must be submitted with the SSN Justification memo.



## 8. WHAT IS REQUIRED WHEN REGISTERING AN IT SYSTEM IN THE ARMY PORTFOLIO MANAGEMENT SOLUTION (APMS)?

The Privacy Impact Assessment (PIA) tab in APMS has four entries pertaining to collection of the SSN that must be answered (listed below). The response to these entries must be consistent with the SSN justification memo, the PIA, and the SORN (if required). Inconsistencies will result in delay or disapproval of the justification.

APMS Entries for SSN Use:

“Does this item contain Social Security Numbers (SSNs) (full or truncated) or use SSNs in the system?”

Legal Justification Comments

What is the specific legislative or legal reference that justifies using SSN?

Select the PRIMARY legislative or legal justification for using SSN.”

# FREQUENTLY ASKED QUESTIONS

## 9. WHAT SHOULD THE SSN ELIMINATION PLAN CONSIST OF?

Any use of the SSN that is not justified through the appropriate authorities must be eliminated. The elimination plan should be consistent with the existing life cycle of the form or IT system to minimize operational impact and reduce overall cost.



### DoDI 1000.30, Enclosure 4:

“c. The plan to eliminate the use of the SSN shall include:

- (1) The alternative being used to replace the function for which SSNs have been used.
- (2) Associated forms and systems that will be affected by elimination of the SSN.
- (3) A mitigation strategy to reduce or eliminate the effects of removal of the SSN in conjunction with associated forms or systems.
- (4) Timeline, with milestones, for removal of the SSN.
- (5) Where elimination is not to occur immediately, include interim measures to provide additional protection of the SSN.
- (6) Where elimination is dependent on changes to other systems and/or forms, include efforts made to work with owners of those systems and/or forms to collaborate and eliminate the use of SSNs.”

## 10. WHO IS AUTHORIZED TO SIGN THE SSN JUSTIFICATION MEMO?

The SSN justification memo for both forms and IT systems must be signed by either an SES or General Officer, as stated in the AAHS/RDF memo, Review of Information Technology Systems to Reduce the Use of Social Security Numbers, dated 29 September 2011.

## 11. WHO IS THE FINAL APPROVAL AUTHORITY FOR USE OF THE SSN?

On behalf of the DoD Senior Agency Official for Privacy, the Chief of the Defense Privacy, Civil Liberties, and Transparency Division approves SSN justifications for all IT systems and all DD forms that collect the SSN. The Chief of Army Privacy coordinates on all SSN justifications and approves SSN use on DA forms on behalf of the Army Senior Component Official for Privacy. SSN justifications for forms (DA and DD) are coordinated through the Army Publishing Directorate. Please note that SSN justification memos are not considered approved until they have been endorsed by the final approval authority.

# FREQUENTLY ASKED QUESTIONS

## 12. WHERE ARE SSN JUSTIFICATION MEMOS FILED?

The approved SSN justification should be maintained with the form or IT system record set and retained in accordance with records management policies stipulated in AR 25-400-2, The Army Records Information Management System (ARIMS). The Army Privacy Office also maintains a copy of approved SSN justification memos.

### **DOCUMENTS ENCLOSED ARE SUBJECT TO THE PRIVACY ACT OF 1974**

Contents shall not be disclosed, discussed, or shared with individuals unless they have a direct need-to-know in the performance of their official duties. Deliver this/these document(s) directly to the intended recipient. **DO NOT** drop off with a third-party.

## 13. WHEN USE OF THE SSN IS REQUIRED, WHAT ACTIONS MUST BE TAKEN IN REGARDS TO SAFEGUARDING THE SSN?

Implementing the appropriate administrative, physical, and technical safeguards is critical when collecting an individual's SSN. Business rules and procedures must be developed to minimize exposure and dissemination of the SSN. Access to the SSN must be limited to personnel who have been properly trained and have a need to know. Personnel who handle material or data that includes the SSN must protect it in accordance with guidance outlined in enclosure 3 of DoDM 5200.01, Volume 4, DoD Information Security Program: Controlled Unclassified Information (CUI).

### DoDI 1000.30, Enclosure 4:

"Justification for the use of the SSN does not constitute blanket permission to use the SSN. Specific reference shall be made to indicate actions being taken to reduce the vulnerability of SSNs, which may include indicating where SSNs are being removed from transactions or any other protections that have been included. It should be obvious to the reader that a thorough effort has been made to evaluate the risk associated with the system or form and that every reasonable step has been or is being taken to reduce the use of the SSN and protect it where the use is still required."

## FREQUENTLY ASKED QUESTIONS

### 14. AFTER AN SSN JUSTIFICATION IS APPROVED FOR A FORM OR IT SYSTEM CAN THE SSN BE USED IN OTHER RECORDS AS NEEDED?

No. Justification for the use of the SSN in a form or IT system does not constitute authority to use the SSN in every transaction or interaction. Each transaction that requires the use or display of the SSN must be closely scrutinized to determine if some alternate form of identification or authentication may suffice. The fact that a use case may loosely meet one or more of the justifications does not necessarily mean that a specific justification is acceptable. The specific legislative or regulatory language must be examined to determine if it is applicable.

#### DoDI 1000.30, Enclosure 2:

“Situational Elimination and Protection. Authority to collect, maintain, or use the SSN does not constitute blanket approval to use the SSN throughout any business process. Every associated report, display, printout, and transaction shall be reviewed to determine the appropriate authority and requirements for the use of the SSN and to determine all other required Privacy Act considerations and documentation. If upon review, it is determined that no authority or legal requirement for the use of the SSN exists, its collection and use should cease until such authority can be obtained. Where appropriate authorities and requirements exist, consideration of whether the SSN can be further protected by masking or truncating must be made.”

### 15. WHEN MUST SSN JUSTIFICATIONS BE UPDATED?

SSN justifications should be reviewed: biennially with the Privacy Act SORN review; when policies or prescribing directives are revised; and when requirement changes affect the form or IT system that collects or uses the SSN. Previous approval of an SSN justification does not enable the continued use permanently. Program managers and system owners should seek opportunities to continually reduce or eliminate the use of SSNs and replace it with an alternative personal identifier.

### 16. WHAT IF THE FORM OR SYSTEM NO LONGER COLLECTS OR USES THE SSN?

If a form or IT system no longer collects or uses the SSN, the form or IT system should be modified to eliminate or change the field. In addition, as applicable, the prescribing directive, business procedures, SORN, Privacy Impact Assessment (PIA), registration in the APMS, and other supporting documentation must be updated to reflect the change. The DD Form 67, Form Processing Action Request, must be submitted when modifying a form; contact the Army Publishing Directorate for guidance.



# SSN JUSTIFICATION MEMO CHECKLIST

THE FOLLOWING CHECKLIST IS PROVIDED TO ASSIST PERSONNEL WITH PREPARING SSN JUSTIFICATION MEMOS AND TO ENSURE DOD REQUIREMENTS ARE ADDRESSED BEFORE SUBMITTING MEMOS FOR APPROVAL. PLEASE BE ADVISED THAT CHANGES TO FEDERAL AND DOD POLICIES OR THE PRESCRIBING DIRECTIVES MAY IMPACT THE ELEMENTS OF THIS CHECKLIST.

DOES THE SSN JUSTIFICATION MEMO:		
1	Reflect the correct addressees? See example memos.	
2	<b>Forms only:</b> Include the form number and full title in the subject line? <b>IT systems only:</b> Include the IT system name and DoD IT Portfolio Repository (DITPR) number in the subject line?	
3	Spell out uncommon acronyms and avoid technical jargon?	
4	Use simple, clear and concise language?	
5	Reflect the date signed?	
6	Describe the purpose of the form or IT system being justified?	
7	Explain why it's necessary to collect the SSN and what is the impact if the SSN were to be eliminated?	
8	State the appropriate acceptable use case from DoDI 1000.30, Enclosure 2? <b>Do not refer to Directive-Type Memorandum (DTM) 07-015, "DoD Social Security Number (SSN) Reduction Plan," March 28, 2008 as this was cancelled and superseded by DoDI 1000.30.</b>	

# SSN JUSTIFICATION MEMO CHECKLIST

9	Explain how the acceptable use case is applicable and relevant to the form or IT system being justified?	
10	<b>IT systems only:</b> Provide information that is consistent with the entries in the PIA and APMS that pertain to SSN use and justification.	
11	State why alternatives to the SSN (such as the DoD ID number) are unacceptable?	
12	<b>Forms only:</b> Identify the SORN(s) associated with the form that is being justified? Provide the SORN identifier, name, and Federal Register citation. <b>If the justification is for a DD form:</b> the SORN(s) used by the other services must be included in the justification. Contact your privacy officer for assistance in obtaining this information.	
13	<b>IT systems only:</b> Identify the SORN(s) associated with the IT system that is being justified? Provide the SORN identifier, name, and Federal Register citation.	
14	<b>Forms only:</b> Identify the associated IT system that uses the SSN? Required when the form is a source document or computer generated by an IT system (input or output). Provide the IT system name(s) and DITPR number(s) (if applicable). <b>If the justification is for a DD form:</b> the IT systems used by the other services must be included in the justification. Contact your privacy officer for assistance in obtaining this information.	
15	<b>IT systems only:</b> Identify the associated forms that collect the SSN? Required when the IT system uses a form as a source document or computer generates a form (input or output). Provide form number(s) and title(s).	
16	Identify the prescribing directive for the form or IT system being justified?	
17	Specify the legal authorities that require the use of the SSN when the acceptable use does not fall under operational necessity use case or the legacy system interface use case?	

# SSN JUSTIFICATION MEMO CHECKLIST

<b>18</b>	Specify what business practices and safeguards have been implemented to minimize disclosure of the SSN?	
<b>19</b>	Include an elimination plan if the acceptable use is Legacy case use or Other Cases?	
<b>20</b>	Have approval/signature from a GO/SES as required by Army policy?	



# DOD ACCEPTABLE USES CASES FOR SSN



**THE FOLLOWING IS AN EXCERPT FROM DODI 1000.30, ENCLOSURE 2. NOTES HAVE BEEN INCLUDED IN TEXT BOXES AS ADDITIONAL GUIDANCE. CAREFULLY READ THE ACCEPTABLE USES TO IDENTIFY IF ONE IS APPLICABLE. THE SSN SHOULD ONLY BE COLLECTED WHEN NECESSARY AND WHEN USE HAS BEEN JUSTIFIED AND APPROVED. PLEASE NOTE CHANGES TO OMB OR DOD POLICIES MAY IMPACT THE INFORMATION PROVIDED IN THIS GUIDE.**

## ACCEPTABLE USES.

- a. The acceptable uses of the SSN are those that are provided for by law, require interoperability with organizations beyond the Department of Defense, or are required by operational necessities. Such operational necessities may be the result of the inability to alter systems, processes, or forms due to cost or unacceptable levels of risk. Those systems, processes, or forms that claim “operational necessity” shall be closely scrutinized. Ease of use or unwillingness to change are not acceptable justifications for this case.
- b. The requirement for the use of the SSN provided by Executive Order 9397 (Reference (h)) has been eliminated. No new uses of the SSN are permitted in accordance with Reference (h) as amended by Executive Order 13478 (Reference (i)). Reference (h) may be used to justify the use of the SSN as an interim measure while its use is being eliminated, but shall not by itself be used to justify continued use of the SSN.
- c. This paragraph describes general categories of use that may continue to be acceptable for the SSN. General coverage of an application by one of the use cases discussed in subparagraphs 2.c.(1) through 2.c.(13) of this enclosure must also be compared with the particular way in which the SSN is used. The fact that a use case may loosely meet one or more of the justifications does not necessarily mean that a specific justification is acceptable. The specific legislative or regulatory language must be examined to determine if it is applicable. Justification for the use of the SSN to be contained in an application does not constitute authority to use the SSN in every transaction or interaction. Any transaction that includes the display, transfer, or presentation of the SSN should be closely scrutinized to determine if some alternate form of identification or authentication may suffice.

# DOD ACCEPTABLE USES CASES FOR SSN

(1) Geneva Conventions Serial Number. As of the late 1960s, the SSN has served as the Geneva Conventions serial number for the Military Services. Many of the systems, processes, and forms used by the Department of Defense categorize individuals by their SSNs. The Military Departments should begin to transition away from the SSN as the Geneva Conventions identifier as further addressed in subparagraph 4.a.(1) of this enclosure.

For service members, the DoD ID card serves as the Geneva Conventions ID card. This is the official means for identification for service members if detained or captured in combat or other conflict that enables protections under the articles of the Geneva Conventions. Eligible civilians designated as emergency essential as defined in DoDD 1404.10 and eligible DoD contractors authorized to accompany the U.S. armed forces pursuant to DoDI 3020.41 are also issued Geneva Conventions ID cards. The DoD ID number has replaced the SSN as the Geneva Conventions Serial number. When possible, the DoD ID number should be used in place of the individual's SSN. **All CAC and DoD Uniformed Services (retiree and family member) ID cards issued after 2010 reflect the DoD ID number. The DoD ID number should be used in lieu of the SSN whenever possible.**



(2) Law Enforcement, National Security, and Credentialing. Almost every law enforcement application available to Federal, State, and local law enforcement and other criminal justice agencies reports and tracks individuals, and makes application information available to other agencies, through the use of the SSN. This includes, but is not limited to, checks of the National Crime Information Center; State criminal histories; and Federal Bureau of Investigation records checks.

Forms and IT systems whose primary function is related to identifying individuals for law enforcement or criminal investigation purposes may require collection of the SSN to interface with agencies external to the Department of Defense.

# DOD ACCEPTABLE USES CASES FOR SSN

(3) Security Clearance Investigation or Verification. The initiation, conduct, adjudication, verification, quality assurance, and billing fund control of background investigations and security clearances requires the use of the SSN. The SSN is the single identifier that links all of the aspects of these investigations together. This use case is also linked to other Federal agencies that continue to use the SSN as a primary identifier.

Forms and IT systems that require the SSN for the purpose of conducting security clearance investigations may require collection of the SSN to interface with agencies external to the Department of Defense to include Federal Law Enforcement and Federal Credit Reporting agencies. Other personal identifiers should be considered for use in systems that are internal to the DoD. The DoD ID number should be used in place of the SSN when possible in systems that are internal to DoD.

(4) Interactions With Financial Institutions. Financial institutions may require that individuals provide the SSN as part of the process to open accounts. It may therefore be required to provide the SSN for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.



Forms and IT systems that directly interface with pay and financial systems may require use of the SSN to conduct transactions. Consider use of an alternate personal identifier when use of the SSN is not required for a transaction or interface.

(5) Confirmation of Employment Eligibility. Federal statute requires that all persons employed within the United States provide an SSN or comparable identifier to prove that they are eligible to work for or with the U.S. Government. Any system that deals with employment eligibility may contain the SSN.

In accordance with United States law, organizations may only hire individuals who can legally work in the U.S. (U.S. citizens or authorized foreign citizens). This acceptable use may be appropriate in Human Resources (HR) systems where the SSN is used as the primary personal identifier. However, every HR system should be evaluated to determine if the SSN is essential for operations. The DoD ID number should be used in place of the SSN when possible in systems that are internal to DoD.

# DOD ACCEPTABLE USES CASES FOR SSN

(6) Administration of Federal Workers' Compensation. The Federal Workers' Compensation Program continues to track individuals through the use of the SSN. As such, systems, processes, or forms that interact with or provide information for the administration of this system or associated systems may be required to retain the SSN.

The Federal Employees' Compensation Act (FECA) (5 U.S.C. 8101) is administered by the U.S. Department of Labor. It provides benefits to U.S. civilian employees for disability due to personal injury sustained while in the performance of duty or to employment-related disease. Forms or IT systems that are required under FECA may require the use of the SSN to process claims. The use in these systems is acceptable until such a time that the program transitions to a different personal identifier:

(7). Federal Taxpayer Identification Number. The application of Federal and State income tax programs rely on the use of the SSN. As such, systems that have any function that pertains to the collection, payment, or record keeping of this use case may contain the SSN. Additionally, individuals who operate corporate entities under their own name may use their SSN as the tax number for that business function.

This use applies to forms and IT systems that are required to account for or deduct Federal or state taxes from an individual by use of the SSN. Simply interfacing with a pay or financial system is not sufficient to justify this as an acceptable use. In systems that are internal to DoD, the DoD ID number should be used when possible.

<b>Form 1040</b> Department of the Treasury—Internal Revenue Service (99)		<b>2013</b>	OMB No. 1545-0074	IRS Use Only—Do not write or staple in this space.
For the year Jan. 1–Dec. 31, 2013, or other tax year beginning , 2013, ending , 20			See separate instructions.	
Your first name and initial <b>Samuel P</b>	Last name <b>Taxpayer</b>	<b>Your social security number</b> <b>123-45-6789</b>		
If a joint return, spouse's first name and initial <b>Felicity Q</b>	Last name <b>Taxpayer</b>	<b>Spouse's social security number</b> <b>432-19-8765</b>		
Home address (number and street). If you have a P.O. box, see instructions. <b>789 Tuxedo Drive</b>		Apt. no.	▲ Make sure the SSN(s) above and on line 6c are correct.	
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). <b>Bronxville NY 10708</b>		<b>Presidential Election Campaign</b> Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. <input type="checkbox"/> You <input type="checkbox"/> Spouse		
Foreign country name		Foreign province/state/county	Foreign postal code	
<b>Filing Status</b>	1 <input type="checkbox"/> Single 2 <input checked="" type="checkbox"/> Married filing jointly (even if only one had income) 3 <input type="checkbox"/> Married filing separately. Enter spouse's SSN above and full name here. ▶	4 <input type="checkbox"/> Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶	5 <input type="checkbox"/> Qualifying widow(er) with dependent child	
<b>Exemptions</b>	6a <input checked="" type="checkbox"/> Yourself. If someone can claim you as a dependent, do not check box 6a . . . . .	Boxes checked on 6a and 6b		
	b <input checked="" type="checkbox"/> Spouse . . . . .	No. of children on 6c who:		
	c <b>Dependents:</b>	(2) Dependent's social security number	(3) Dependent's relationship to you	• lived with you
(f) First name	Last name		(4) <input checked="" type="checkbox"/> if child under age 17 qualifying for child tax credit (see instructions)	• did not live with you due to divorce or separation (see instructions)
<b>Cyril T</b>	<b>Taxpayer</b>	<b>123-45-1234</b>	<b>Son</b>	
<b>Heidi W</b>	<b>Taxpayer</b>	<b>123-23-2345</b>	<b>Daughter</b>	<input checked="" type="checkbox"/>
<b>Sydney D</b>	<b>Taxpayer</b>	<b>123-54-9876</b>	<b>Parent</b>	<input type="checkbox"/>
If more than four dependents, see instructions and ▶				Dependents on 6c not entered above <b>1</b>

## DOD ACCEPTABLE USES CASES FOR SSN

(8) Computer Matching. Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information. These applications shall be rigorously scrutinized to determine the availability of some other means for conducting these transactions.

Computer matching is primarily applicable to IT systems that exchange data with other IT systems that are external to the DoD where the SSN is the unique personal identifier that is common to both systems. IT systems that exchange data with other DoD systems should transition to the DoD ID number or other unique personal identifier.



(9) Foreign Travel. DoD personnel are often required to travel beyond the borders of the United States and many members often require official clearance prior to travel. Currently, the SSN is used as the identifier for these purposes.

This acceptable use should only be used when DoD sponsored official travel requires diplomatic and personnel travel clearances (Country, Theater and Special Area).

(10) Noncombatant Evacuation Operations (NEOs). The Department of State requires that all persons repatriated to the United States as part of a NEO present their SSN as part of this process. Any systems, forms, or processes supporting NEOs may be required to process individuals using the SSN as the primary identifier.

This acceptable use can only be applied to forms and IT systems that are directly required to process individuals during NEO missions.

# DOD ACCEPTABLE USES CASES FOR SSN

(11) Legacy System Interface. Many systems, processes, or forms that do not meet the criteria in subparagraphs 2.c.(1) through 2.c.(10) of this enclosure for the continued use of the SSN may not be able to transition to another identifier in a timely manner due to an interface with a legacy system still using the SSN, or due to the excessive cost associated with the change. In these cases, the continued use of the SSN may be acceptable for a specified period of time, provided that formalized, written plans are in place for the migration away from the SSN in the future. Plans to alter these use cases must take into account interactions with other applications as well as all methods for entry, processing, or transfer of information from said application. It is critical that transfer away from the SSN does not cause unacceptably long interruptions to continued operations.



When a form or IT system must continue to use the SSN as a unique personal identifier because there is no alternative currently available and it does not meet any of the other acceptable uses, then the legacy acceptable use may apply. This may be applicable when one IT system is dependent on data transfers (interface) with another IT system. When the legacy acceptable use case is applied an elimination plan must be submitted with the justification memo.

(12) Operational Necessity. It is not the intention of this Instruction to preclude operational capabilities. In austere or tactical environments where continuity of operations requires the use of SSN, to include the use of hard copy lists and spreadsheets, approval can be granted that supersedes normal requirements. An example of this may include a system in a tactical environment where hard copies are used in the event of a loss of power to the system. To ensure that this is only used in cases of absolute necessity, justification of this use case must be approved by the Combatant Commander. The higher risk and increased liability to Service members and the Department of Defense should be strongly considered prior to granting approval to use this category of justification.

The intent of the operational necessity use case is to enable the collection of the SSN when required in **austere or tactical** environments. This use case should not be applied to justify the use of the SSN in garrison under normal or routine operating conditions.

# DOD ACCEPTABLE USES CASES FOR SSN

(13) Other Cases. The previous categories may not include all uses of the SSN authorized by law. Should an application owner be able to show sufficient grounds that a use case not specified in subparagraphs 2.c.(1) through 2.c.(12) of this enclosure is required by law, that use case may continue to use the SSN. Any application that seeks to use this clause as justification must provide specific documentation in order to continue use in accordance with this provision.

For forms or IT systems citing “Other Cases,” rationale must be clear and supported by specific authorities that enable the collection and use of the SSN. Additional supporting documentation may be required to support the justification.

## Acceptable Use



# PREPARING SSN JUSTIFICATIONS

THE MEMOS ON THE FOLLOWING PAGES ARE PROVIDED AS EXAMPLES TO HELP PERSONNEL PREPARE SSN JUSTIFICATIONS. PLEASE REFER TO THE CHECKLIST AT PAGE 10 OF THIS GUIDE TO ENSURE ALL DOD AND OMB REQUIREMENTS HAVE BEEN ADDRESSED. THE MEMO MUST BE ON THE APPROPRIATE ORGANIZATIONAL LETTER HEAD AND ADHERE TO FORMATTING STANDARDS IN AR 25-50, PREPARING AND MANAGING CORRESPONDENCE. ADDITIONALLY, PROCESS MAP DIAGRAMS ARE PROVIDED AT PAGES 28 AND 29 OF THIS GUIDE TO SHOW THE STEPS IN THE APPROVAL PROCESS FOR SSN JUSTIFICATIONS. PLEASE BE ADVISED THAT CHANGES TO DOD AND ARMY POLICIES MAY IMPACT THE REQUIREMENTS FOR PREPARING SSN JUSTIFICATION MEMOS.



# SSN JUSTIFICATION MEMO FOR DD FORMS



**DEPARTMENT OF THE ARMY**  
OFFICE OF THE ADMINISTRATIVE ASSISTANT TO THE SECRETARY  
U.S. ARMY HEADQUARTERS SERVICES  
9301 CHAPEK ROAD  
FORT BELVOIR VA 22060-5527

Use appropriate organizational letterhead.

DATE

AAHS-ZA

MEMORANDUM THRU

These agencies must review and coordinate on the memo before submission to the DoD Privacy Office for approval.

Army Privacy Office (AAHS-RDF), 7701 Telegraph Road, Casey Building, Alexandria, VA 22315-3802

Army Publishing Directorate, Forms Management Division (AAHS-PAF), 9301 Chapek Road, Bldg 1458, Fort Belvoir, VA 22060-55477

Records, Privacy, and Declassification Division, 4800 Mark Center Drive, Alexandria, VA 22350-3100

The DoD Privacy Office (DPCLTD) approves SSN justifications for DD forms on behalf of the SAOP. The record of approval or disapproval will be returned through the Army Publishing Directorate and Army Privacy Office.

FOR Defense Privacy, Civil Liberties, and, Transparency Division, 4800 Mark Center Drive, Alexandria, VA 22350-3100

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DD Form 12345, Enforcement of Child Support Obligation

Include the form number and complete title.

1. This memorandum is to satisfy the requirements of DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within the DoD," requiring justification to collect and use the SSN.

2. The DD Form 12345, Enforcement of Child Support Obligation, is used to collect personal information from service members who have court ordered child support payments. The SSN is used by all States as a unique personal identifier to administer child support payment programs. Use of the SSN is necessary to identify the individual and update their information in the personnel and finance systems. Currently it is the only method available to positively identify an individual who is on the State child support registry.

Explain the use of the form and why the SSN is necessary.

3. The applicable acceptable uses for collection and use of the SSN are (7) Federal Taxpayer Identification Number and (8) Computer Matching. The SSN is required to update pay records for court ordered garnishment of wages for child support payments. Further, the information from the DD Form 12345 is a source document for personnel systems which are used to conduct automated comparisons with State registries for child support cases.

Identify the appropriate acceptable uses from DoD 1000.30, Enclosure 2.

# SSN JUSTIFICATION MEMO FOR DD FORMS

AAHS-ZA

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DD Form 12345, Enforcement of Child Support Obligation

Continuation page heading.

4. The IT Systems and the System of Records Notices (SORNs) associated with the DD Form 12345 are as follows:

- Army - Army Personnel System (SPS), DITPR #54321, A0600-60 AHRC, Military Personnel File
- Navy - Navy Personnel System (NPS), DITPR # 123, N0230-11, Navy Military Personnel File
- Air Force - Air Force Personnel System (AFPS), DITPR # 231, F035-3, Air Force Personnel File
- DFAS - Major Military Pay System (MMPS), DITPR #654321, T345-2, Military Pay Records

The IT systems for which the DD form is a source document (input or output) or uploaded must be identified for each service that uses the form. If there is a DoD-wide IT system only list that one system.  
The applicable SORNs must also be identified for each service that uses the form. If there is a DoD-wide SORN, only list that one SORN.

5. The prescribing directive for the DD Form 12345 is AR 600-60, Army Human Resource Management Program. Appropriate authorities supporting collection of the SSN are: 10 U.S.C. 113: Secretary of Defense; 42 U.S.C. 653a: State Directory of New Hires; and DOD 7000.14-R, Volume 7A, DoD Financial Management Regulation.

Identify the prescribing directive for the form. Authorities must be current and consistent with the PIA and SORN. Do not list all authorities, only include those that support the collection of the SSN.

6. The DD Form 12345 is not made publically available. Only personnel with a need to know have access to the form. A thorough effort has been made to evaluate the risk associated with use of the SSN on form. Paper and electronic copies of the forms disposed of as required by the records disposition schedules. Personnel using the form are required to follow the established safeguards to protect the individual's privacy.

Specify the business practices and safeguards implemented to minimize disclosure of the SSN.

7. My POCs is Mr. Roy Rogers (321-123-4567, roy.rogers568.civ@mail.mil).

JOHN J. JACOBS  
Executive Director

Must be signed by an SES/GO.

# SSN JUSTIFICATION MEMO FOR DA FORMS



**DEPARTMENT OF THE ARMY**  
OFFICE OF THE ADMINISTRATIVE ASSISTANT TO THE SECRETARY  
U.S. ARMY HEADQUARTERS SERVICES  
9301 CHAPEK ROAD  
FORT BELVOIR VA 22060-5527

Use appropriate organizational letterhead.

DATE

AAHS-ZA

MEMORANDUM THRU

Army Publishing Directorate, Forms Management Division (AAHS-PAF), 9301 Chapek Road, Bldg 1458, Fort Belvoir, VA 22060-55477

The Army Publishing Directorate will coordinate on the SSN justification memo for all DA forms.

FOR Army Privacy Office (AAHS-RDF), 7701 Telegraph Road, Casey Building, Alexandria, VA 22315-3802

The Army Privacy Office (APO) approves SSN justifications for DA forms on behalf of the SCOP.

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DA Form 54321, Relocation Assistance Request

1. This memorandum is to satisfy the requirements of DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within the DoD," requiring justification to collect and use the SSN.

Include the form number and complete title.

2. The DA Form 54321, Relocation Assistance Request, is used to collect personal information from service members and civilian employees who have a permanent change of assignment and desire a sponsor to assist with the relocation process. The last four of the SSN is collected on the form to positively identify the individual when uploading data in the Military Relocation Processing System (MRPS) and the Civilian Relocation Processing System (CRPS). These systems have not migrated to use of the DoD ID number, therefore continued use of the SSN is necessary until the IT systems are upgraded.

Explain the use of the form and why the SSN is necessary.

3. The applicable acceptable use for collection and use of the SSN is (11) Legacy System Interface. The DA Form 54321 is a source document for MRPS and CRPS. Due to the number of individuals in the systems with the same or similar names, the SSN is the only unique identifier that can be used to select the correct record. The SSN elimination plan for this form is attached.

Identify the appropriate acceptable uses from DoD 1000.30, Enclosure 2.

4. The IT Systems and the System of Records Notices (SORNs) associated with the DD Form 53421 are as follows: Military Relocation Processing System (MRPS), DITPR #12345, A0600-60 AHRC, Military Personnel File; Civilian Relocation Processing System (CRPS), DITPR # 6543, A0625-60, Civilian Personnel Record.

The IT systems for which the DA form is a source document (input or output) or uploaded must be identified. The applicable SORNs must also be identified.

# SSN JUSTIFICATION MEMO FOR DA FORMS

AAHS-ZA

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DA Form 54321, Relocation Assistance Request

Continuation page heading.

5. The prescribing directive for the DD Form 12345 is AR 600-8-11, Reassignment. Appropriate authorities supporting collection of the SSN are: 5 U.S.C. 5724, Travel and transportation expenses of employees transferred; advancement of funds; reimbursement on commuted basis; 37 USC 476: Travel and transportation allowances: dependents; baggage and household effects; DoDI 1315.18, Procedures for Military Personnel Assignments; and Joint travel Regulations (JTR) Uniformed Service Members and DoD Civilian Employees, Appendix 1.

Identify the prescribing directive for the form. Authorities must be current and consistent with the PIA and SORN. Do not list all authorities, only include those that support the collection of the SSN.

6. A thorough effort has been made to evaluate the risk associated with use of the SSN on form. The SSN has been truncated to reduce risk of unauthorized disclosure of the full SSN. Only personnel with a need to know have access to the form. Privacy Act cover sheets are used to protect documents in the work areas. Paper and electronic copies of the forms disposed of as required by the records disposition schedules. The SSN is masked on reports that are printed from the system.

Specify the business practices and safeguards implemented to minimize disclosure of the SSN.

7. My POCs is Mr. Roy Rogers (321-123-4567, roy.rogers568.civ@mail.mil).

JOHN J. JACOBS  
Executive Director

Must be signed by an SES/GO.

Encl  
SSN Elimination Plan

SSN Elimination Plan may be required based on the Acceptable Use.

# SSN ELIMINATION PLAN

## SOCIAL SECURITY NUMBER ELIMINATION PLAN

SSN Elimination Plan may be required based on the Acceptable Use. **This format is used for IT systems and forms.**

**System/Form Name:** DA Form: 54321, Relocation Assistance Request  
**System of Records Notice Number:** A0600-60 AHRC, Military Personnel File and A0625-60, Civilian Personnel Record.  
**System/Form Owner:** Department of the Army

Complete all details as required in the header.

### **Inputs that use, provide, or are identified by SSN:**

**Forms:** DA Form 54321 uses the SSN to identify the Soldier or Army Civilian that is preparing for a permanent change of station. Currently, there is no alternative as this form is uploaded in the individual's electronic personnel record. These systems have not transitioned to the use of the DoD ID number, therefore the SSN is the most reliable unique identifier available.

For each form that is a source document (**input or output**) include the purpose that the SSN serves as well as potential alternatives. Include pertinent details regarding the plan to eliminate the use of the SSN.

**Systems:** The Military Relocation Processing System (MRPS), DITPR #12345, and Civilian Relocation Processing System (CRPS), DITPR # 6543, uses the SSN to interface with the Soldier Personnel System (SPS) and Civilian Personnel System (CPS). Currently MPRS and CRPS do not have a field for the DoD ID number.

For each system that provides an **input or output** to a system or is responsible for generating the form, the plan shall discuss the purpose served by the SSN and any potential alternatives. Include important details regarding their plan to eliminate the use of the SSN.

### **Outputs that include or are identified by the SSN:**

**Forms:** The DA Form 54321 is an input form only.

**Systems:** The output documents from MRPS and CRPS do not include the SSN.

Include specific steps required to eliminate use of the SSN with dates by which these steps will be accomplished. Include references to dependencies such as other forms or systems, availability of resources (manpower, funding, etc) and dates by which these milestones will be completed. Although there may be significant constraints on making these changes, it is not acceptable to avoid activity through mutual dependencies.

### **Elimination Strategy and Timeline:**

Inclusion of the DoD ID number has been identified as a new requirement and approved by the Configuration Control Board for the next increments of MPRS and CRPS. These systems are scheduled for development in FY18 and deployment by FY19.

The upgraded systems will include a web version of the form, which will enable the individual to validate with their CAC and provide responses directly to the system. An electronic version of the DA Form 54321 will be maintained for personnel who are not able to access the web form. It will be modified to replace the SSN with the DoD ID number and introduced when the prescribing directive is published. Successful transition of these systems is dependent on future funding and budget constraints.

### **Interim Strategy and Timeline:**

To minimize the unauthorized disclosure, collection of the SSN on the DA Form 54321 has been limited to the last four of the SSN. The completed forms are used and maintained in a controlled area only accessible to personnel who have a need-to-know. Safeguarding and destruction is in accordance with DoDM 5200.01, Vol 4.

Where elimination of the SSN cannot be achieved quickly or directly, interim steps shall be taken to provide better protection for SSNs. This may include masking or truncation, changes to displays or reports, or any other steps that can be shown to provide improvements to protection.

# SSN JUSTIFICATION MEMO FOR IT SYSTEMS



**DEPARTMENT OF THE ARMY**  
OFFICE OF THE ADMINISTRATIVE ASSISTANT TO THE SECRETARY  
U.S. ARMY HEADQUARTERS SERVICES  
9301 CHAPEK ROAD  
FORT BELVOIR VA 22060-5527

Use appropriate organizational letterhead.

DATE

The Army Privacy Office must coordinate on the memo before submission to the DoD Privacy Office for approval.

AAHS-ZA

MEMORANDUM THRU

The DoD Privacy Office (DPCLTD) approves SSN justifications for IT systems on behalf of the SAOP. The record of approval or disapproval will be returned through the Army Privacy Office.

Army Privacy Office (AAHS-RDF), 7701 Telegraph Road, Casey Building,  
Alexandria, VA 22315-3802

FOR Defense Privacy, Civil Liberties, and, Transparency Division, 4800 Mark  
Center Drive, Alexandria, VA 22350-3100

Include the name of the IT System and DITPR number.

SUBJECT: Justification for the Use of the Social Security Number (SSN) – Military  
Relocation Processing System (MRPS), DITPR #12345

1. This memorandum is to satisfy the requirements of DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within the DoD," requiring justification to collect and use the SSN.

Explain the use of the IT system and why the SSN is necessary.

2. Per the requirements established in AR 600-8-11, Reassignment, the Military Relocation Processing System (MRPS) is the official U.S. Army system utilized to manage permanent change of station assignments for Soldiers. The MRPS uses the SSN to interface with the Soldier Personnel System (SPS) which maintains human resources data that is included in the individual's Military Personnel File.

Identify the appropriate acceptable uses from DoD 1000.30, Enclosure 2.

3. The applicable acceptable use for collection and use of the SSN is (8), Computer Matching. Additionally, AR 600-8-11, justifies the use of SSNs for the purpose of identifying personnel and preparing permanent change of station orders which are in turn used to process travel payments and other cost associated with the individual's move.

Identify the following:  
- Forms which the IT system uses a source document (input or output).  
- Other IT systems that the system being justified depends on for the SSN  
- The SORN for the system being justified (if required).

4. The forms, interfacing IT system, and the System of Records Notices (SORNs) associated with the IT system are as follows: DA Form 54321, Relocation Assistance Request; Soldier Personnel System (SPS), DITPR #54321; A0600-60 AHRC, Military Personnel File.

# SSN JUSTIFICATION MEMO FOR IT SYSTEMS

AAHS-ZA

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DD Form 12345, Enforcement of Child Support Obligation

Continuation page heading.

5. Authorities supporting collection of the SSN are: 37 U.S.C. 476: Travel and transportation allowances: dependents; baggage and household effects; DoDI 1315.18, Procedures for Military Personnel Assignments; and AR 600-8-11, Reassignment.

Authorities must be current and consistent with the PIA and SORN. Do not list all authorities, only include those that support the collection of the SSN.

6. Inclusion of the DoD ID number has been identified as a new requirement and approved by the Configuration Control Board for the next increment of MPRS. The system is scheduled for development in FY18 and deployment by FY19. In accordance with DoD's plan to eliminate the use of SSNs, MRPS utilizes truncated SSNs and SSNs no longer appear on the MRPS end user homescreen to minimize the opportunity for unauthorized disclosure.

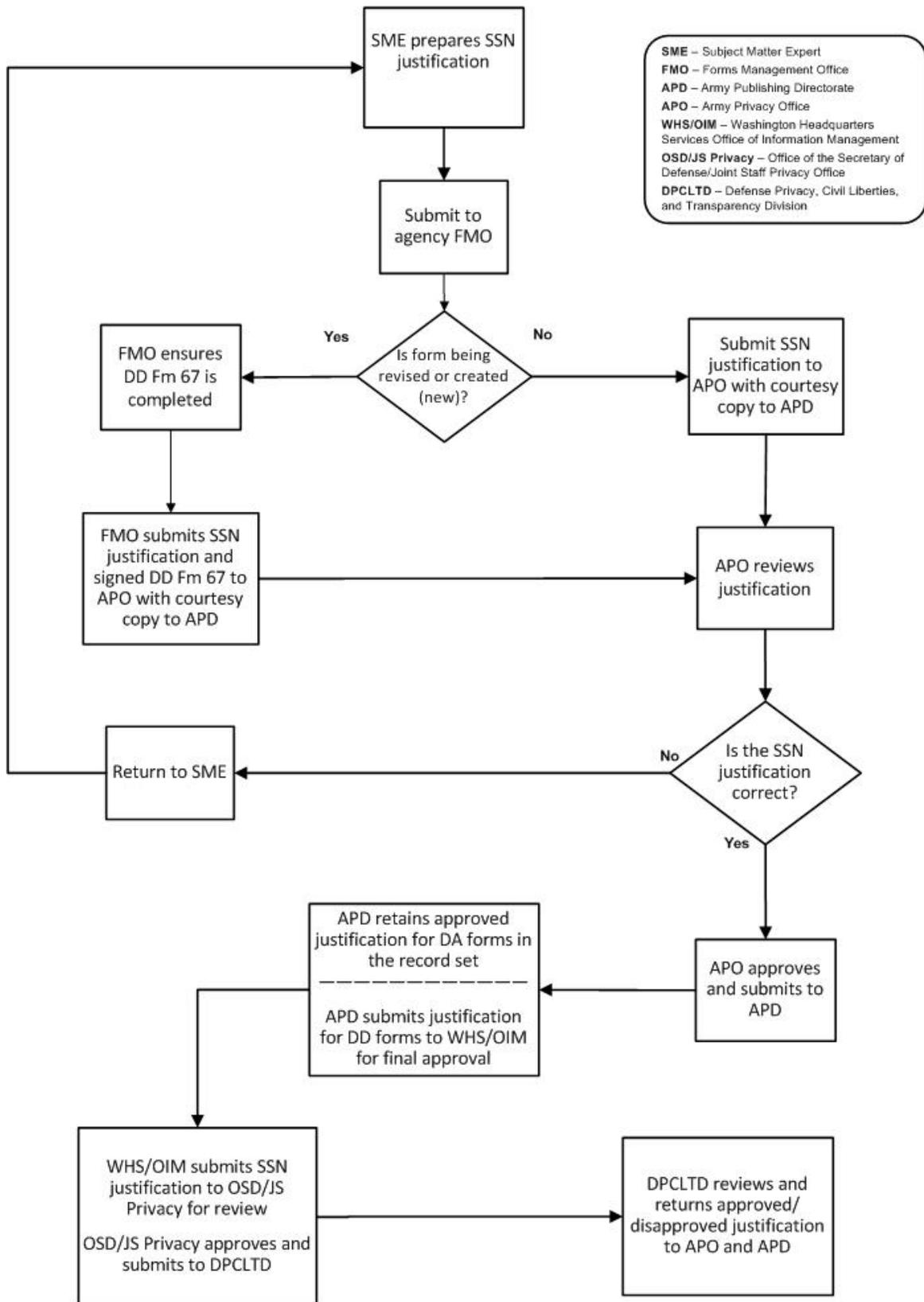
Specify the business practices and safeguards implemented to minimize disclosure of the SSN.

7. If you have any questions or concerns, please contact Chris P. Bacon at (555) 555-0123 or email ([chrispbacon@AFS.gov](mailto:chrispbacon@AFS.gov)).

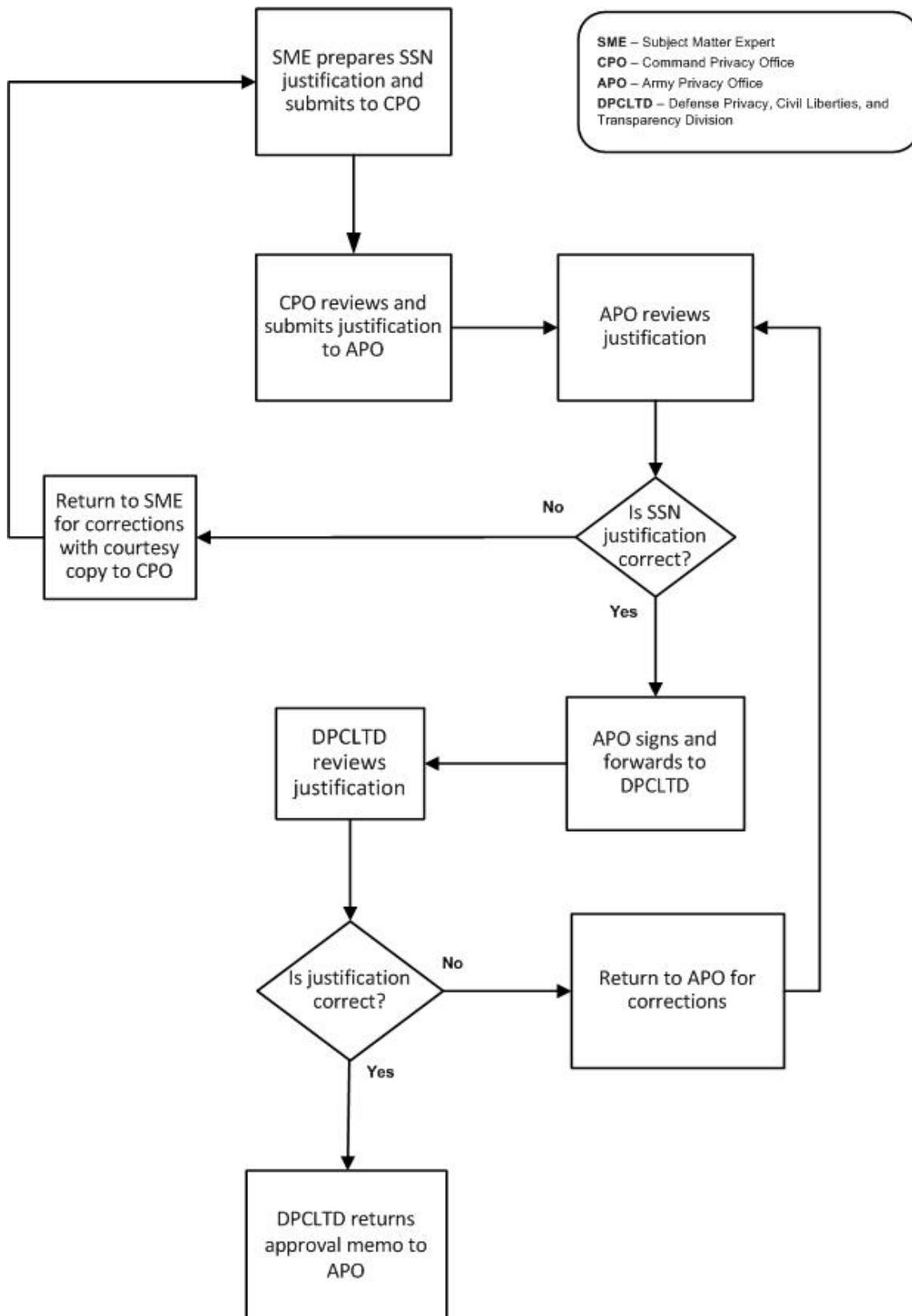
BARRY CUDDA  
Chief of Military Assignments

Must be signed by an SES/GO.

# SSN JUSTIFICATION PROCESS MAP — FORMS



# SSN JUSTIFICATION PROCESS MAP — IT SYSTEMS



# REFERENCES AND RESOURCES

## REFERENCES

- A. Privacy Act of 1974 (5 U.S.C. 552a) (As Amended)
- B. E-Government Act of 2002 (Public Law 107-347)
- C. Executive Order 9397, Numbering System for Federal Accounts relating to Individual Persons (As Amended)
- D. OMB Circular No. A-108, Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act, December 23, 2016
- E. OMB Circular No. A-130, Managing Information as a Strategic Resource, July 28, 2016
- F. DoDM 5200.01, Volume 4, DoD Information Security Program: Controlled Unclassified Information (CUI), February 24, 2012
- G. DoDD 5400.11, DoD Privacy Program, October 29, 2014
- H. DoD 5400.11-R, Department of Defense Privacy Program, May 14, 2007
- I. DoDI 1000.30, Reduction of Social Security Number (SSN) Use Within DoD, August 1, 2012
- J. AR 25-22, The Army Privacy Program, December 22, 2016
- K. AR 25-30, Army Publishing Program, June 3, 2015
- L. AR 25-50, Preparing and Managing Correspondence, May 17, 2013
- M. AR 25-400-2, The Army Records Information Management System (ARIMS), October 2, 2007
- N. AAHS/RDF memo, Review of Information Technology Systems to Reduce the Use of Social Security Numbers, September 29, 2011

## RESOURCES

- A. Army Privacy Office: <https://www.rmda.army.mil/privacy/RMDA-PO-Division.html>
- B. Army Publishing Directorate: <http://www.apd.army.mil/Tools/PubsResources.aspx>
- C. Defense Privacy, Civil Liberties and Transparency Division: <http://dpcl.d.defense.gov/>
- D. Federal Trade Commission, Identity Theft: <https://www.consumer.ftc.gov/features/feature-0014-identity-theft>
- E. Identity Theft.gov: <https://www.identitytheft.gov/>
- F. President's Task Force on Identity Theft Strategic Plan: <https://www.ftc.gov/sites/default/files/documents/reports/presidents-identity-theft-task-force-report/081021taskforcereport.pdf>
- G. Security in Numbers - SSNs and Id Theft, Federal Trade Commission Report December 2008: <https://www.ftc.gov/sites/default/files/documents/reports/security-numbers-social-security-numbers-and-identity-theft-federal-trade-commission-report/p075414ssnreport.pdf>
- H. Social Security Administration, Identify Theft and Your SSN: <https://www.ssa.gov/pubs/EN-05-10064.pdf>

