



**DEFENSE HUMAN RESOURCES ACTIVITY
FEDERAL VOTING ASSISTANCE PROGRAM**
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MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

THROUGH: Office of the Secretary of Defense/Joint Staff Privacy Office

FROM: Matt Boehmer, Acting Director, Federal Voting Assistance Program

SUBJECT: Justification for the Use of the Social Security Number (SSN) - Federal Write-in Absentee Ballot (SF 186)

The Federal Write-in Absentee Ballot (FWAB) is used by members of the Uniformed Services, Merchant Marine, their dependents and U.S citizens living abroad (collectively referred to as Uniformed and Overseas Citizen Absentee Voter Act (UOCAVA) voters) to vote in elections if they have previously requested an absentee ballot but have not yet received it. In some States, it may be used for voter registration and ballot request as well. The FWAB is available in paper (SF186) and electronic (SF186a) versions. The same automated tool on FVAP.gov can also be used to complete SF186a. Attached is the proposed FWAB revision.

When citizens complete the paper FWAB they mail it directly to the appropriate State or territory office. It is not received or used by the Federal government, but used by the States and territories in order to determine voter eligibility, register voters, and identify if the owner submitted backup ballot is an eligible registered voter. If the automated tool on FVAP.gov is used to complete the forms, any information entered by the voter (to include the SSN) is not stored in the system and is deleted when the citizen exits the program.

The acceptable use applicable for continued collection of Social Security Numbers is (13) Other Cases. In this instance the FWAB form must broadly satisfy the varied requirements in all 50 States, 4 territories, and the District of Columbia. Only Massachusetts and North Dakota do not use the SSN in any form. The full SSN is required as a voter identification number by Hawaii, Kentucky, South Carolina, Tennessee, and Virginia. American Samoa, Delaware, and New Mexico allow voters to provide either their full SSN or their State Driver's License (or ID) number as their voter identification number. The remaining States and territories either allow voters to provide the last 4 digits of their SSN or their State Driver's License (or ID) number.

The 2005 iteration of the FWAB form had marked the full SSN as "Required" information. In the 2011 iteration of the FWAB form, FVAP worked to increase voter privacy, and removed the "Required" language. The 2013 iteration that we are currently working to approve makes clear that most States do not require the full SSN. The option to provide either the State Driver's License or ID number is listed prior to the social security number. Revised instructions on the forms indicate that voters should check their individual State instructions in the Voting Assistance Guide or at FVAP.gov to verify whether their full SSN is required.

Because the collection of SSNs is governed by State and territorial laws the SSN Usage Instruction Use Case that applies to the forms is Other Cases.

Attachments: As stated

OSD/JS Privacy Official Initials: _____ Date: _____

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