

DEFENSE THREAT REDUCTION AGENCY AND

UNITED STATES STRATEGIC COMMAND CENTER FOR COMBATING WEAPONS OF MASS DESTRUCTION

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MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of the Social Security Number (SSN) – DTRA Forms 150

REF: (a) DoDI 1000.30, Reduction of Social Security Number Use Within DoD of Aug 1, 2012

The Defense Threat Reduction Agency (DTRA) is a Department of Defense (DoD) agency that serves as executive agent for the Nuclear Test Personnel Review (NTPR) Program. The NTPR Program serves approximately 500,000 military personnel and DoD civilian employees who participated in U.S. atmospheric nuclear weapons testing (1945-1962), with the occupation forces of Hiroshima and Nagasaki, Japan, or were prisoners of war in Japan at the conclusion of World War II. The NTPR Program assists these military and civilian test participants, supports the Department of Veterans Affairs (VA) and Department of Justice (DOJ) in responding to radiogenic disease compensation claims, and provides information to authorized organizations responsible for studies concerning the health effects of ionizing radiation. For DTRA to fulfill this role, it must collect information from veterans and former DoD civilian employees to uniquely identify them. DTRA Forms 150 serve as the collection vehicle:

- DTRA Form 150: Nuclear Test Personnel Review Information Request and Release
- DTRA Form 150-A: Questionnaire for Continental United States Test Participants
- DTRA Form 150-B: Questionnaire for Oceanic Test Participants
- DTRA Form 150-C: Questionnaire for Operation Crossroads Test Participants

Authority to collect this information is provided by PL 98-542 which appointed the Defense Nulcear Agency (now DTRA) Executive Agent for the NTPR Program. Overarching authorities include: 38 U.S.C. 1112 and 1154 (Veterans' Benefits); and 42 U.S.C. 2210 (DOJ Radiation Exposure Compensation Act).

It is DoD policy to reduce or eliminate the use of SSNs wherever possible. However, reference (a) does allow for thirteen categories of continued use. The continued collection of SSNs, via DTRA Forms 150, is authorized per category 6, "Administration of Federal Workers' Compensation." The NTPR Program collects and maintains SSNs in order to support two federal workers' compensation programs, administered by DOJ and VA. NTPR collection of SSN is documented in:

- System of Record Notice HDTRA 010, Nuclear Test Participants (May 11, 2012, 77 FR 27739):
 http://dpclo.defense.gov/Privacy/SORNsIndex/DODComponentArticleView/tabid/7489/Article/6386/hdtra-010.aspx
- Privacy Impact Assessment (January 24, 2013): http://www.dtra.mil/docs/documents-eeo-policy/ntrr-pia-public-2013-01-24.pdf?sfvrsn=0

The NTPR Program has initiated an aggressive program to minimize its use of SSNs:

- The SSN is not used in case file labeling. Instead, a unique NTPR key number is employed.
- The SSN is not cited in outgoing correspondence, unless it is used as an identifier by the requesting federal agency (e.g. VA).

In summary, whenever possible a unique NTPR key number has replaced the use of the SSN by the NTPR program.

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