

## DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 EAST 56TH STREET INDIANAPOLIS, INDIANA 46249

MAY 0 6 2013

## MEMORANDUM FOR RECORD

SUBJECT: Justification for Requirement of Social Security Number (SSN) on DD Form 137-6, "Dependency Statement – Full Time Student 21 – 22 Years of Age

The Department of Defense Form 137-6, Dependency Statement – Full Time Student 21-22 Years of Age is used to determine the relationship and dependency of an individual on the military member and retired military member, for entitlement of authorized benefits. The form record type of entitlement requested: Basic Allowance for Housing (BAH), Uniformed Services Identification and Privilege Card, and Travel Allowance. The member initiates the form; however, both member and dependent enter the necessary data before the member signs and dates the form. A Notary Public must also sign the form before the member submits it to their Service Personnel Office for determination of entitlement eligibility. The completed form is used by the field sites or DFAS to enter data into the pay systems that generate payments to the members.

The following SSN Usage Instruction Use Case pertains to the need for SSN on the DD Form 137-6:

Legacy System Interface. The current legacy systems, Defense Joint Military Pay System – Active Component (DJMS-AC), Defense Joint Military Pay System – Reserve Component (DJMS-RC) and the Marine Corps Total Force System (MCTFS), used to pay military members, require an SSN to process transactions. SSNs will no longer be required on the DD Form 137-6 after the Army Integrated Personnel and Pay System, managed by the Army; the Air Force Integrated Personnel and Pay System, managed by the Air Force; and the Navy Integrated Personnel and Pay System, managed by the Navy are implemented; and the Marine Corps Total Force System, managed by the Marine Corps, transitions from the use of SSN to another key to identify records. As these changes are accomplished, DD Form 137-6 will transition to the new key as expeditiously as possible. Without using the SSN at this time, DFAS would not be able to meet the requirements of 5 U.S.C. 301, Departmental Regulations, 37 U.S.C., and 10 U.S.C.

For the SSN Usage Instruction Use Case listed, the lack of an SSN would create a risk that improper payments could be made to ineligible members and the Disbursing or Certifying Officer would not be able to certify payments as required by 31 U.S.C. 3528.

For this form, the SSN cannot be truncated without the risk of misidentifying the service member, nor can it be masked since the form is used in a paper format.

The data on this form is covered by the following System of Records Notices:

T7346, Defense Joint Military Pay System – Reserve Component (authorized by 5 U.S.C. 301, Departmental Regulations; 10 U.S.C., Chapter 11; 37 U.S.C. and Executive Order (E.O.) 13478);

T7340, Defense Joint Military Pay System – Active Component (authorized by 5 U.S.C. 301, Departmental Regulations; 37 U.S.C. and E.O. 13478);

M01040-3, Marine Corps Total Force System (authorized by 10 U.S.C. 5013 and 37 U.S.C. 5031 and 5201).

The System of Records Notices are published at:

http://dpclo.defense.gov/privacy/SORNs/component/dfas/ (all but MCTFS) http://dpclo.defense.gov/privacy/SORNs/component/usmc/M01040-3.html (MCTFS)

The DoD Information Technology Portfolio Repository (DITPR) Identification Number for DJMS-RC is 244 and the DITPR for DJMS-AC is 92.

The Paperwork Reduction Act (PRA) Notice for DD Forms 137 (OMB License Number 0730-0014) was published in the Federal Register on June 15, 2007, Docket No. DoD 2007-OS-0062.

The data on this form is covered by Privacy Impact Assessments (PIAs) for DJMS-AC, DJMS-RC and MCTFS located at:

http://www.dfas.mil/foia/privacyimpactassessments.html http://www.doncio.navy.mil/ContentView.aspx?ID=678.

The paper forms as well as the data entered on the system from this form are secured to protect Personally Identifiable Information (PII) in accordance with DoD regulations. Records are stored in office buildings protected by guards, controlled screening, use of visitor registers, electronic access, and/or locks. Access to records is limited to individuals who are properly screened and cleared on a need-to-know basis in the performance of their official duties. Passwords and digital signatures are used to control access to the systems data, and procedures are in place to deter and detect browsing, and unauthorized access. Physical and electronic access are limited to persons responsible for servicing, and authorized to use the record system.

The DFAS Privacy Act Official has provided a digital signature on the attached coordination page. If you have any questions, my point of contact is Stuart Kran, DFAS Code JJFMB. He can be reached by telephone at (216) 204-4377.

Cynthia B. Garcia

Director, Finance Standards and Customer Services

Attachments: As stated

## **DFAS DD/SD SSN Forms Review** Form #: DD Form 137-6 Form Name Dependency Statement - Full Time Student 21 - 22 Years of Age Coordinated and Reviewed by Privacy Act Offical DATE 20130323 Digitally signed by OUTLAW.GREGORY.L. 1085047317 DN: c=US, o=U.S. Government, ou=DoD, RY.L.1085047317 ou=PKI, ou=DFAS, cn-OUTLAW.GREGORY.L.1085047317 Date: 2013.03.26 18:34:37 -04'00' Printed Name Gregory L. Outlaw Title Freedom of Information/Privacy Act Program

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