



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

SEP 30 2014

MEMORANDUM FOR DIRECTOR, DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

THROUGH: OSD/JS PRIVACY OFFICE ALLARD.CINDY
.L.1231656614

Digitally signed by
ALLARD.CINDY.L.1231656614
DN: c=US, o=U.S. Government,
ou=DoD, ou=PKI, ou=WHS,
cn=ALLARD.CINDY.L.1231656614
Date: 2014.10.16 09:46:38 -0400

SUBJECT: Justification to Collect Social Security Number (SSN) on DD Form 149,
“Application for Correction of Military Record Under the Provisions of Title 10,
U.S. Code, Section 1552.”

This memorandum is provided in accordance with Department of Defense Instruction (DoDI) 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” requiring justification to collect and use the Social Security Number (SSN) on DD Form 149, “Application for Correction of Military Record Under the Provisions of Title 10, U.S. Code, Section 1552.”

Under title 10, U.S.C., section 1552, Active Duty and Reserve Component Service members, Coast Guard, former Service members, their lawful or legal representatives, spouses of former Service members on issues of Survivor Benefit Program benefits, and civilian employees with respect to military records other than those related to civilian employment, who feel that they have suffered an injustice as a result of error or injustice in military records may apply to their respective Boards for Correction of Military Records for a correction of their military records. These Boards are the highest level appellate review authority in the military. The data collected is covered by the Systems of Record Notices applicable to the correction of discharge review board and official military records maintained by each of the Military Departments (available at <http://dpclo.defense.gov/Privacy/SORNs.aspx>).


The continued use of the Service member’s SSN is required due to an interface with legacy systems still using the SSN, in accordance with DoDI 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” Enclosure 2, paragraph 2.c.(11), Legal System Interface. Consequently, the Service member’s SSN is required to retrieve these records and locate the applicant’s official military personnel file and pay record. Currently, the entire history of a military member’s personnel record can only be traced through the individual’s SSN. Collection of SSN is necessary because various Department of Defense and Military Department legacy military personnel systems use the SSN as a unique identifier. The SSN cannot be truncated without the risk of misidentifying the member, nor can it be masked as the form is used in a paper format, absent conversion to “federal employee number” or alternative system that capable of uniquely identifying members.

To prevent a clearly unwarranted invasion of personal privacy, identifying details of the applicant and other persons shall be deleted from documents made available for public access, in accordance with Department of Defense Directive 1332.4, “Directive Boards for Correction of Military Records (BCMRs) and Discharge Review Boards (DRBs).” Names, addresses, social

security numbers, and military service numbers must be deleted. Written justification shall be made for all other deletions and be available to the public.

While in Service custody, this information is privileged and restricted to individuals who have a need for the record in the performance of their official duties. Computer terminals with access to the records are located in rooms with authorized personnel. These rooms are locked when unoccupied. Common Access Card certificates and personal identification number, or login and passwords are used to support the minimum requirements of accountability, access control, least privilege, and data integrity. Additionally, intrusion detection systems, malicious code protection, and firewalls are used.

My point of contact on this issue is the Office of Legal Policy at (703) 687-3387.


Virginia S. Penrod
Chief of Staff