

the SSN should be closely scrutinized to determine if some alternate form of identification or authentication may suffice.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

(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.

### 3. DOCUMENTING AUTHORIZED USES

a. 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