



**OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
HEALTH AFFAIRS**

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DEFENSE
HEALTH AGENCY

5 February 2014

MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Continued Use of the Social Security Number (SSN) in the Department of Defense (DoD) Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS)

This memorandum is written to satisfy the requirements established in the Department of Defense Instruction (DoDI) 1000.30, Reduction of Social Security Number (SSN) Use Within DoD (USD(P&R), August 1, 2012), with respect to the Department of Defense (DoD) Women, Infants, and Children Overseas Participant Information Management System (WIC PIMS). WIC PIMS does not have a DoD Information Technology Portfolio Repository identification number. This memorandum provides justification for the continued collection and use of Social Security Numbers (SSNs) by WIC PIMS. The System of Records Notice applicable to WIC PIMS is EDHA 10 (November 18, 2013, 78 FR 69076) (Attachment 1). This memorandum is submitted to the Defense Privacy and Civil Liberties Office in support of the Defense Health Agency's proposed alteration of EDHA 10, the current draft of which alteration is Attachment 2. The Privacy Impact Assessment for WIC PIMS became effective August 6, 2013 (Attachment 3). The WIC PIMS Office of Management and Budget Control Number is 0720-0030, which has an expiration date of September 30, 2016 (Attachment 4).

WIC PIMS is used to document and determine whether applicants are eligible for enrollment in the DoD WIC Overseas Program, provide benefits to participants, and evaluate the effectiveness of the services provided. The DoD WIC Overseas Program provides supplemental foods and nutrition education to eligible participants.

In accordance with DoDI 1000.30, continued use of SSNs within WIC PIMS must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30 Enclosure 2. The Acceptable Use Case applicable to WICPIMS is:

2.c (11) Legacy System Interface. Transitioning the WIC PIMS participant ID number to another participant identifier would require an excessive cost to the government to have the changes made to the system. The WIC PIMS could not transition in a timely and cost effective manner to the use of DoD ID numbers because some WIC Overseas eligible participants do not have a DoD ID card with a DoD number assigned to them. The WIC PIMS is currently in the operational/maintenance phase of the system development life-cycle. The government is researching ways to migrate away from the use of the last four digits of the SSN in the future that would not cause unacceptable cost or interruption in WIC Overseas services.

The TRICARE Overseas Program Office, DHA's point of contact for this program is Ms. Kimberly Stakes, Program Analyst, WIC Overseas Program. Ms. Stakes may be reached at 703-681-0039, extension 8690, or Kimberly.Stakes@dha.mil.

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Chief, TRICARE Overseas Program Office

Attachments:
As stated