



DEFENSE FINANCE AND ACCOUNTING SERVICE

1240 EAST NINTH STREET
CLEVELAND OHIO 44199

AUG 05 2013

DFAS-JFB/CL

MEMORANDUM FOR RECORD

SUBJECT: Justification for the Use of the Social Security Number (SSN) on DD Form 2790, Custodianship Certificate to Support Claim on Behalf of Minor Children of Deceased Members of the Armed Forces

This memorandum is to justify the collection and use of the Social Security Number (SSN) on DD Form 2790, Custodianship Certificate to Support Claim on Behalf of Minor Children of Deceased Members of the Armed Forces, in accordance with the Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012.

Pursuant to 10 U.S.C. Chapter 73, subchapters II and III, DoDI 1332.42, DoD Financial Management Regulation (DoDFMR), Volume 7B, Chapter 42 (Retired Pay) and Chapter 46 (Annuitant Pay) and Executive Order 13478, the SSN is required for proper identification in the establishment or update of retired and annuity pay accounts. Retired and Annuity Pay Systems (RCPS), including the Defense Military Retiree and Annuity Pay System (DRAS), are designed to identify accounts by the retired member's SSN. There are no other methods to properly identify a member.

DD Form 2790 is used to identify the custodian of an unmarried minor child, incapacitated child, or child at least age 18 but under age 22 and attending school. This information is needed to pay Survivor Benefit Plan or Reserve Component Survivor Benefit Plan funds. The member's SSN and annuitant's SSN are required entries.

The following SSN Usage Instructions pertain to the need for the SSN on this form:

Legacy System Interface. DRAS requires the SSN to identify the member/annuitant. Until that legacy system is revised or replaced, collecting the SSN is necessary. Without the SSN, DFAS could not meet the requirements of 5 U.S.C. 301, Departmental Regulations, 38 U.S.C., and 10 U.S.C. Section 1450. When this legacy system, managed by DFAS, transitions from the SSN to another key, DD Form 2790 will transition to the new key as expeditiously as possible.

Interactions with Financial Institutions. The SSN is needed for financial institutions to identify the recipients. The SSN must be provided to Federal Reserve banks to distribute payments made through the direct deposit system to financial institutions or their processing agents.

Federal Taxpayer Identification Number. The data on the form is used to update the civilian employee or military member's pay account. The updated data on the account is used to generate Federal, State, and Local income tax statements which report taxable wages and withholding to the Federal, State and Local tax agencies. Tax reporting information must be reported using the individual's SSN. The SSN is also needed to process Federal tax levies. (See 26 United States Code Section 6109 and Treasury Financial Manual, Volume 1, Part 3 Chapters 4000 and 5000.)

For the SSN Usage Instructions listed, the lack of an SSN would create a risk that improper payments could be made to ineligible beneficiaries and the Disbursing or Certifying Officer could not certify the payment as required in 31 U.S.C. 3325.

The data on this form is covered by a Privacy Impact Assessment (PIA) located at <http://www.dfas.mil/more/dfasfreedomofinformationactprivacyact/dfaspia.html> and Systems of Records Notice (SORN) T7347b published at <https://www.defenselink.mil/privacy/notices/dfas>. DoD Information Technology Portfolio Repository (DITPR) 98 applies to this form. The paper forms and copies of the form are secured to protect Personally Identifiable Information (PII) in accordance with DoD regulations.

If you have any questions, my point of contact is Charles A. Moss, Special Reviews, DRAS QPA Team, DFAS Cleveland. He can be reached at (216) 204-4426.



Thomas J. Murphy
Director, DFAS Cleveland

DFAS DD/SD SSN Forms Review

Form #: DD Form 2790

Form Name Custodianship Certificate To Support Claim on Behalf of Minor Child 

DATE 20130409

Coordinated and Reviewed by
Privacy Act Official

NORTH.LARRY
Y.1216768244

Digitally signed by
NORTH.LARRY.1216768244
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=DFAS,
cn=NORTH.LARRY.1216768244
Date: 2013.04.09 13:28:59 -04'00'

Printed Name Larry North

Title Paralegal

Submit by Email

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