



## DEFENSE SECURITY SERVICE

27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

June 22, 2017

### MEMORANDUM FOR DEFENSE PRIVACY CIVIL LIBERTIES AND TRANSPARENCY DIVISION

THROUGH CHIEF, FOIA/PRIVACY ACT

SUBJECT: Justification for the Use of the Social Security Number (SSN) for National Industrial Security System (NISS)

The National Industrial Security System (NISS) is a Defense Security Service (DSS) enterprise information system of record for contractor facility security clearances. (FCL). The purpose, role, and responsibilities of the National Industrial Security System (NISS) are laid out in DoD Instruction 5220.22, Volume 3, April 17, 2014, and Executive Order 12829, National Industrial Security Program, January 6, 1993.

The Defense Security Service (DSS) is creating a new system of records, "The National Industrial Security System". The National Industrial Security System (NISS) will become the repository of records related to the collection and maintenance of information pertaining to contractor facility security clearances and contractor capabilities to protect classified information in its possession. The DoD Information Technology (IT) Portfolio Repository (DITPR) number for NISS is 14954. The information is utilized to determine if a company and its key management personnel are eligible for issuance of a facility clearance in accordance with the National Industrial Security Program Operating Manual (NISPOM) requirements. In addition, information is utilized to inform Government Contracting Activities of contractor's ability to maintain facility clearance status, and to analyze vulnerabilities identified within security programs and ensure proper mitigation actions are taken to preclude unauthorized disclosure of classified information. The DSS is currently working with its Information Management Control Officer to develop the 60-day Paperwork Reduction Act (PRA) notice.

Collection of full Social Security Numbers (SSNs) from non-DoD personnel is an acceptable use of the SSN provided by DoDI 1000.30, subparagraph 2.c.(3), Security Clearance Investigation or Verification, and subparagraph 2.c. (8) Computer Matching. The SSN is the single identifier that links all aspects of a security clearance investigation together through process and technical interfaces. This use case is also linked to other Federal agencies that continue to use the SSN as a primary identifier. In addition, The NISS collects SSN of individuals who are the culpable party of a security violation. The SSN is used to create an incident report in the Joint Personnel Adjudication System (JPAS), as necessary. Additionally, this retention is necessary to identify patterns of negligible behavior in individuals with security clearances.

DSS will store all personally identifiable information (PII) electronically which has physical controls. The records are maintained in a controlled facility in servers located within the DSS Data Center East. Access to the records is limited to person(s) responsible for servicing the record in performance of their official duties and who are properly screened and cleared for need-to-know. Physical entry is restricted by the use of Security Guards, Identification Badges, Key Cards, and Closed Circuit TV, and is only accessible to authorized personnel. Paper records are contained and stored in regulation safes/filing cabinets which are located in a Sensitive Compartmented Information Facility (SCIF) with limited access. Access to the NISS is restricted by User Identification, Intrusion Detection System, Encryption, Firewall, External Certificate Authorities, DoD Public Key Infrastructure Certificates and Common Access Card and PIN. The DSS reviewed all of the safeguards established for the system to ensure they are compliant with The Department of Defense (DoD) requirements and are appropriate to the sensitivity of the information stored within the system, including the use of SSNs. The proposed specific routine uses have been reviewed to ensure the minimum amount of personally identifiable information shared has been established.

A copy of the draft system of records notice and privacy impact assessment for the National Industrial Security System is attached. The records disposition is pending until the National Archives and Records Administration (NARA) approves the disposition schedule. A copy of the SF-115 submitted to NARA for approval in April 2017 is attached.

Craig Kaucher  
Chief Information Officer

Enclosures:  
Draft Privacy Act Statement  
Draft System of Records Notice (SORN)  
Draft Privacy Impact Assessment (PIA)  
Request for Records Disposition Authority (SF-115)