

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

1500 DEFENSE PENTAGON WASHINGTON, D.C. 20301-1500

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY DIVISION

THROUGH RECORDS, PRIVACY, AND DECLASSIFICATION DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) for DD Form 2065,

"Request Disposition of Remains – Reimbursable Basis," and DD Form 1375,

"Request for Payment of Funeral and/or Interment Expenses"

In accordance with the requirement established in Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," this memorandum justifies the collection and continued use of the SSN on the DD Form 2065, "Disposition of Remains – Reimbursable Basis," and on the DD Form 1375, "Request for Payment of Funeral and/or Interment Expenses."

The DD Form 2065 records disposition instructions and costs for preparation and final disposition of remains. The DD Form 1375 provides the Person Authorized to Direct Disposition (PADD) an instrument to apply for reimbursement of funeral/interment expenses. This information is used to adjudicate and pay claims submitted by the PADD.

DD Forms 2065 and 1375 are initially prepared by military authorities and presented to the next-of-kin or sponsor to fill in the reimbursable costs or desired disposition of remains. Without the information on these forms, the government would not be able to respond to the survivor's wishes or justify its expenses in handling the deceased. Also available at government expense is transportation of the remains to a port of entry in the United States.

As required in DoDI 1000.30, the acceptable uses for the SSN have been identified as 2.c.(8), Computer Matching, and 2.c(4)., Interactions with Financial Institutions. The SSN collected on the DD Forms 2065 and 1375 is used in published computer matching agreements to verify an individual's eligibility for benefits from Federal agencies (e.g., Department of Veterans Affairs). The collection of SSN allows the DoD to minimize the risk of providing benefits to those who are not eligible and helps minimize fraudulent claims. Because more than one person may share the same name, accurate retrieval of information through the use of a SSN is the only available method at this time to make and prove an accurate and timely determination concerning the death of an individual and to determine for what benefits the decedent's family may be eligible. The forms also interface with the Internal Revenue Service which are used to apply for reimbursement of funeral/interment expenses, to adjudicate and pay claims, and to record costs for preparation and final disposition of remains.

The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with DoD 5400.11-R, "Department of Defense Privacy Program," and is covered by the system of records notice, "A0600-8-1c AHRC DoD, Defense Casualty Information Processing System."

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SSN ELIMINATION PLAN

System/Form Name: DD Form 2065, "Request Disposition of Remains – Reimbursable Basis,"

and DD Form 1375, "Request for Payment of Funeral and/or Interment

Expenses"

System of Records Notices:

A0600-8-1c AHRC DoD, Defense Casualty Information Processing System (DCIPS)

System/Form Owner: Department of Defense

Inputs that use, provide, or are identified by SSN:

Forms: DD Form 2065 and DD Form 1375 use the SSN to identify sponsors and their next of kin in order to ensure accurate identification associated with the delivery of DoD benefits and services. Not all eligible sponsors have another alternative identifier that may be used at this time. The DoD Central Joint Mortuary Affairs Board (CJMAB) will explore future alternatives as they come available. Currently, the CJMAB found that replacing the present SSN-based identifier would be complex and that broad action would be necessary to accomplish across Federal agencies.

Systems: The Defense Casualty Information Processing System uses the SSN to identify sponsors and their next-of-kin in order to ensure accurate identification associated with the delivery of DoD and other Federal benefits and services. Not all eligible beneficiaries have another alternative identifier that may be used at this time. The DoD CJMAB will explore future alternatives as they come available. Currently, the CJMAB found that replacing the present SSN-based identifier would be complex and that broad action would be necessary to accomplish across Federal agencies, to include the Internal Revenue Service, Social Security Agency, etc., until broad action is enacted.

Outputs that include or are identified by SSN:

Forms: The DD Form 2065 records disposition instructions and costs for preparation and final disposition of remains. The DD Form 1375 provides the Person Authorized to Direct Disposition (PADD) an instrument to apply for reimbursement of funeral/interment expenses. The information on these forms are used to adjudicate and pay claims submitted by the PADD.

System: The Defense Casualty Information Processing System uses the SSN to identify sponsors and their next-of-kin in order to ensure accurate identification associated with the delivery of DoD and other Federal benefits and services. The SSN is currently the identifier used for Social Security benefits, Veterans Affairs benefits, etc.

Elimination Strategy and Timeline:

Broad action would be necessary to accomplish across Federal agencies, to include the Internal Revenue Service, Social Security Agency, etc. The CJMAB meets quarterly and will continue to monitor developments of alternative identifiers that may be developed for Federal agencies to use for decedents and their beneficiaries.

Interim Strategy and Timeline:

Where elimination of the SSN cannot be achieved quickly or directly, interim steps, where possible, shall continue to be explored and taken to provide better protection for SSNs.