



OFFICE OF THE SUPERINTENDENT
UNITED STATES MILITARY ACADEMY
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MASP

MEMORANDUM THRU Army Privacy Office (AAHS-RDF), 9301 Chapek Road, Bldg. 1458, Fort Belvoir, VA 22060-5605

FOR Defense Privacy, Civil Liberties, and Transparency Division, 4800 Mark Center Drive, Alexandria, VA 22350-3100

SUBJECT: Justification for the Use of the Social Security Number (SSN) for the Academy Management System (AMS), DITPR #2628

1. This memorandum is to satisfy the requirements of DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within the DoD," requiring justification to collect and use the SSN.
2. The United States Military Academy uses the Academy Management System (AMS) to control and document applications by cadet candidates, congressional offices, field teams, and the Directorate of Admissions. The United States Military Academy uses AMS to document and track military development, academic development, and physical development of every USMA Preparatory School candidate and USMA cadet. The SSN is used to track past and present student records and is used for interactions with financial institutions and the IRS.
3. The applicable acceptable use for the collection and use of the SSN within AMS are:
 - a. Law Enforcement, National Security, Credentialing. This includes, but is not limited to, checks of the National Crime Information Center (NCIC); state criminal histories; and Federal Bureau of Investigation records checks.
 - b. Security Clearance Investigation or Verification. The initiation, conduct, or verification of security clearances requires the use of the SSN. The SSN is the single identifier that links together all aspects of these investigations.
 - c. Interactions with Financial Institutions. Systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions requires the SSN of those individuals; the Defense Finance and Accounting Service (DFAS) requires an individual's SSN for various financial and pay actions.

MASP

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d. Federal Taxpayer Identification Number. The application of Federal and State income tax programs relies on the use of the SSN. As such, systems that have any function that pertains to the collection, payment, or recordkeeping of this use must contain the SSN. Defense Finance Accounting System (DFAS) requires an individual's SSN for various benefit actions.

e. Foreign Travel. United States Military Academy personnel often travel beyond the borders of the United States and many members often require official country clearance prior to travel. Currently, the SSN serves as the identifier for this purpose.

4. Authorities supporting collection of the SSN are: 10 U.S.C 7013, Secretary of the Army; 10 U.S.C 7434, Command and Supervision; Army Regulation (AR) 150-1, U.S. Military Academy Organization, Administration, and Operation; E.O. 9397 as amended.

5. The System of Records Notice (SORN) associated with the IT system is A0351-17B USMA, U.S. Military Academy Management System Records.

6. A thorough effort has been made to evaluate the risk associated with the use of the SSN within AMS. The United States Military Academy restricts access to the SSNs stored within AMS and instead generates unique identifiers for candidates for admission and cadets. All user roles, except for database administrators and report generators, have no access to stored SSNs—AMS uses role-based access control. Database administrators are the principle roles with access to the SSNs within the AMS database. Reports to entities that need the SSN for their business processes are the only reports to include SSNs.

7. If USMA was unable to use SSNs within AMS, USMA would be unable to:

a. Disambiguate applicants, students (current and past), staff and faculty sufficiently well to receive background and security checks in a timely manner. Background and security check processes are not yet able to process EDI-PI numbers. Delayed admissions offers to applicants would disadvantage USMA in its recruiting and in the execution of its primary mission.

b. Pass information to/from the Cadet Treasurer to cadets via AMS. This would negatively impact the ability of cadets to gain and maintain situation awareness of their current finances and financial status with the Cadet Treasurer. Modifying the code base for AMS to use C-numbers or EDI-PI numbers is in our plan for AMS 2.0—a yet-to-be-built capability in its requirements gathering phase.

c. Pass information to the IRS for purposes of tax reporting for cadets. The IRS offers no options except for SSNs. The United States Military Academy would need to coordinate with and develop alternative reporting mechanisms with DFAS to support USMA specific reporting to the IRS.

MASP

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d. Pass cadet, staff, and faculty information to country clearance processing personnel without additional, and time consuming, coordination efforts per traveler. Country Clearance processes do not yet support the use of EDI-PI numbers.

8. The point of contact for this action is LTC Michael Lanham, West Point Chief Information Security Officer (CISO), Michael.Lanham@westpoint.edu, 845-938-0431 and 845-938-0565.

2 Encls

1. DD2930 Privacy Impact Assessment
2. DREN Authority to Operate



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