01 AUG 2019

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY DIVISION

THROUGH: Cynthia DiLorenzo, Chief, TRICARE Overseas Program Office, Women, Infants and Children Overseas Participant Information Management System (WIC PIMS)

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

1. System / Form

The Women, Infants and Children Overseas Participant Information Management System (WIC PIMS) Information System (IS) 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 members of the Armed Forces, civilian employees, and DoD contractors living overseas, and their family members. The WIC PIMS IS collects and processes program data containing limited Personally Identifiable Information (PII) and Protected Health Information (PHI) necessary to administer benefits and manage the program.

2. Documentation

As documented in the attached System of Records Notice (SORN) EDHA 10 DoD Women, Infants, and Children Overseas Participant Information Management System and Privacy Impact Assessment dated 12 DEC 2016, the WIC PIMS IS is utilized to collect information from eligible members of the general public and Federal personnel and/or Federal contractors for the purpose of administering DoD WIC Overseas benefits.

3. Authorized Uses

The justification for the continued use of the partial SSN in accordance with DoDI 1000.30, enclosure 2 is:

2.c.(12) Operational Necessity - The WIC PIMS IS utilizes the Family Member Prefix (FMP) and sponsor’s truncated SSN (last 4) to generate a Participant ID in the PIMS application. At the time of application for benefits, and during recertification, participants are asked to provide the sponsor’s most current Leave and Earnings Statement (or other income documentation) and the sponsor’s orders. These documents normally contain the last 4 digits of the sponsor’s SSN. The truncated SSN provides a unique static identifier which allows for validation of sponsorship and eligibility for benefits. This unique and static identifier also facilitates the program manager’s ability to identify possible fraud or administrative errors.

4. Point of Contact

Please refer all questions and actions related to the memorandum to Ms. Kimberly Stakes, [kimberly.l.stakes.civ@mail.mil], TRICARE Overseas Program Office, (703) 275-6055.

Cynthia A. DiLorenzo

Chief, TRICARE Overseas Program Office