



**DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY**  
27130 TELEGRAPH ROAD  
QUANTICO, VA 22134-2253

April 19, 2021

**MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND  
TRANSPARENCY DIVISION**

**THROUGH:** Defense Counterintelligence and Security Agency, BI, Policy  
Defense Counterintelligence and Security Agency, FOI/P, Charles Watters

**SUBJECT:** Justification for the Use of Social Security Numbers (SSNs) in Forms General Request for Investigative Information (INV 40), Employment Data and Supervisor Information (INV 41), Personal Information (INV 42), Educational Registrar and Dean of Students Record Data (INV 43), Law Enforcement Data (INV 44).

1. System /Form

The information collected on the General Request for Investigative Information (INV 40), Employment Data and Supervisor Information (INV 41), Personal Information (INV 42), Educational Registrar and Dean of Students Record Data (INV 43), Law Enforcement Data (INV 44) forms is used for Federal and Federal contract employment.

2. Documentation

As noted in the Personnel Vetting SORN, the INV 40, 41, 42, 43, and 44 are used to collect information from a multitude of sources to support federal background investigation and personnel vetting processes such as: investigations and determinations of eligibility for access to classified national security information, and for access to special access programs; suitability for federal employment; fitness of contractor personnel to perform work for or on behalf of the U.S. Government; and Homeland Security Presidential Directive (HSPD)-12 determinations for Personal Identity Verification (PIV) credentials to gain logical or physical access to government facilities and systems. Section 925 of Public Law 115-91; 5 U.S.C. 301, and Executive Order 13467, as amended by Executive Order 13869 authorize the collection of information. The INV Form 44, in particular, facilitates DCSA's access to criminal history record information under 5 U.S.C. 9101.

The content of the INV forms is also designed to meet notice requirements for personnel investigations specified by 5 C.F.R. 736.102(c). These notice requirements apply to any "investigation . . . to determine the suitability, eligibility, or qualifications of individuals for Federal employment, for work on Federal contracts, or for access to classified information or restricted areas."

None of the forms are used for any purpose other than a personnel background investigation, as described above. The completed forms are maintained by DCSA subject to the protections of the Privacy Act of 1974, as amended.

Procedurally, the subject of a personnel background investigation discloses the identity of relevant sources, such as supervisors, coworkers, neighbors, friends, current or former spouses, instructors, relatives, or schools attended, on the standard form (SF) SF 85, Questionnaire for Non-Sensitive Positions; the SF 85P, Questionnaire for Public Trust Positions; or the SF 86, Questionnaire for National Security Positions. The INV forms are distributed to the provided source contacts identified on the standard form questionnaire through an automated mailing operation.

The INV 40 is used to collect records from a Federal or State record repository or a credit bureau. The INV 44 is used to collect law enforcement data from a criminal justice agency. The INV 41, 42, and 43 are sent to employment references, associates, and educational institutions. The INV 40, 41, 43, and 44 contain the subject's full name, date of birth and full SSN. The INV 42 - Personal Information – does not include the subject's SSN or DOB. The forms disclose that the source's contact information was provided by the subject to assist in completing a background investigation regarding the subject's eligibility for employment or security clearance, and request that the source complete the form to help in this determination.

### 3. Authorized Uses

In accordance with DoDI 100.30, continued use of SSNs for forms General Request for Investigative Information (INV 40), Employment Data and Supervisor Information (INV 41), Educational Registrar and Dean of Students Record Data (INV 43), Law Enforcement Data (INV 44), must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The applicable Acceptable Use Case is as follows:

Acceptable Use Case 2.c. (3), Security Clearance Investigation or Verification. The initiation, adjudication, verification, quality assurance, and billing fund control of background investigations and security clearances requires the use of the SSN. The SSN is the single identifier that links all of the aspects of these investigations together. This use case is also linked to other Federal agencies that continue to use the SSN as a primary identifier.

4. The system of records notice (SORN) currently applicable to all the INV forms [the General Request for Investigative Information (INV 40), Employment Data and Supervisor Information (INV 41), Personal Information (INV 42), Educational Registrar and Dean of Students Record Data (INV 43), and the Law Enforcement Data (INV 44)] is DUSDI 02-DoD, Personnel Vetting Records System.

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5. A thorough effort has been made to evaluate the risk associated with use of the SSN on the INV 40, 41, 43, and 44 forms. Only authorized personnel with a need to know will have access to the form. Privacy Act cover sheets will be used to protect documents in work areas. Paper and electronic copies will be disposed of as required by the records disposition schedules.

6. Point of Contact

For questions related to this memorandum contact Donna L. McLeod at [Donna.L.McLeod.civ@mail.mil](mailto:Donna.L.McLeod.civ@mail.mil).



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