



DEFENSE FINANCE AND ACCOUNTING SERVICE

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INDIANAPOLIS, IN 46249-0201

April 18, 2018

MEMORANDUM THROUGH RECORDS, PRIVACY, AND DECLASSIFICATION DIVISION

FOR: Defense, Privacy, Civil Liberties, and Transparency Division

SUBJECT: Justification for Use of Social Security Number (SSN) – Department of Defense (DoD) (DD) Form 2761, Personal Check Cashing Agreement

This memorandum is written to satisfy the requirement established in the DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD" that requires justification of the collection and use of the SSN on DD Form 2761.

1. The DD Form 2761 is one of the required agreements entered into with the Disbursing Office (DO) by eligible individuals for the privilege of cashing personal checks. The agreement authorizes the DO to immediately check the individuals pay account for the amount of the check, if it is returned from the bank because of insufficient funds. The DD 2761 is initiated and completed by the applicant at the appropriate disbursing office. The disbursing office uses this form to determine the eligibility of the applicant. The completed form is used by the disbursing office to later collect any indebtedness from the applicant's pay account. The paper forms and copies are secured to protect Personally Identifiable Information in accordance with DoD regulations. Records are stored in office buildings protected by guards, controlled screening, use of visitor registers, electronic access, and/or locks. Access to records is limited to individuals who are properly screened and cleared on a need-to-know basis in the performance of their official duties.
2. As required in DoDI 1000.30, the acceptable use for the SSN has been identified as 2c.(11) Legacy System Interface. The SSN of the eligible individuals is still used in various legacy pay systems that interface with disbursing systems. This data is required for possible collection of indebtedness due to dishonored checks from the individual's pay account. The SSN cannot be truncated without the risk of misidentifying the individual, nor can it be masked since the form is used in a paper format. If the Department of Defense did not collect the SSN from the individual, there is a risk that any possible collection action could not be made as required by Public Law 104-134, Debt Collection and Improvement Act of 1996; 5 U.S.C. Section 5514, Installment deduction for indebtedness to the United States; and 37 U.S.C. 1007, Deductions from pay.

3. The information collected on this form is covered under the Privacy Act System of Records Notices:
T7340, Defense Joint Military Pay System – Active Component, DITPR #92, (<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570191/t7340/>);
T7344, Defense Joint Military Pay System – Reserve Component, DITPR #244, (<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570195/t7344/>);
T7347b, Defense Military Retiree and Annuity Pay System Records, DITPR# 98, (<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570196/t7347b/>); and
M01040-3, Marine Corps Manpower Management Information System Records, DITPR#113 (<http://dpclد.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570625/m01040-3/>).
4. The SSN will no longer be needed on the DD Form 2761 when an alternate method of identification is initiated. Once this is accomplished, pay systems will be modified to recognize the alternate method of identification.

If you have any questions, my point of contact is Mr. Thomas McKenna, and he can be reached at telephone (216) 204-1679.

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Director, Finance Standards & Customer Services