DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF STAFF
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WASHINGTON DC 20310-0200

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MEMORANDUM THRU

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

SUBJECT: Justification for the Use of Social Security Numbers (SSN) on DD Form 1952, Dosimetry Application and Record of Occupational Exposure

1. This memorandum is to satisfy the requirement of the Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) use Within DoD."

2. The purpose of this memorandum is to justify the use of SSNs on DD Form 1952 "Dosimetry Application and Record of Previous Exposure," prescribed by Army Regulation 385-10, The Army Safety and Occupational Health Program. The DD Form 1952 is used to collect data to establish the qualification for radiation monitoring of the individual and ensure exposure limits are not exceeded due to previous exposure to ionizing radiation.

3. As required in DODI 1000.30, the acceptable use is identified as 08, Computer Matching and 11, Legacy System Interface. The SSN is required to satisfy legal requirements of Title 10, Code of Federal Regulations. The DD Form 1952 is the Department of Defense (DoD) version of the Nuclear Regulatory Commission (NRC) Form 4 and the Automated Dosimetry Report (ADR) is the Army version of the NRC Form 5. Both the NRC Form 4 and Form 5 require SSNs. The Army has exposure records dating back to 1954 and routinely provides dosimetry records to the Veterans Administration (VA), to former employees of the Army seeking employment, and to family members of deceased veterans. These records are requested by SSN to match VA records and to meet NRC recordkeeping requirements.

4. The Systems of Records Notice (SORN) is A0385-10 DAS, "Radiation Exposure Records." The automated record system is the Central Dosimetry Radiation Repository

(CDRR) which is a DoD information system with Identification Number DA03878/AITR6485. A Privacy Impact Assessment has been completed on the CDRR. when completed, the DD Form 1952 and all automated documents are marked and secured as privacy act controlled information.

5. The Army Dosimetry Center (ADC), manager of the CDRR, will continue to evaluate the need for the SSN in future upgrades to the CDRR and every two years as required by the DODI 1000.30. The ADC will monitor the NRC and VA use of SSNs and eliminate the SSN requirement when those Agencies remove the legal requirement and discontinue using the SSN as an identifier. The ADC will also explore the feasibility of using the DOD Identification Number for future use while maintaining the capability to retrieve SSN identified data from the legacy database.

6. The prescribing directive for the DD Form 1952 is AR 385-10 The Army Safety and Occupational Health Program. Appropriate authorities supporting collection of the SSN are: 5 USC 301 - Departmental Regulation: Purposes; 42 USC 2073, 2093, 2095, 2111, 2133, 2134, 2201(b), and 2201(o). The authority for soliciting the social security number is 10 CFR 20; 44 USC 3101 - Record Management by Agency Heads, General Duties.

7. The DD Form 1952 is not made publically available. Only personnel with a need to know have access to the form. A thorough effort has been made to evaluate the risk associated with use of the SSN on the form. Paper and electronic copies of the form is disposed of as required by the records disposition schedules. Personnel using the form are required to follow the established safeguards to protect the individual's privacy.

8. The point of contact for this action is Tim Mikulski, Army Radiation Safety Officer, 703-697-1321, DSN 227-1321 or email timothy.h.mikulski.civ@mail.mil.

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