



OVERSIGHT AND
COMPLIANCE

OFFICE OF THE CHIEF MANAGEMENT OFFICER
9010 DEFENSE PENTAGON
WASHINGTON, DC 20301-9010

June 28, 2019

MEMORANDUM FOR THE NATIONAL DEFENSE UNIVERSITY

SUBJECT: Justification for the Use of Social Security Numbers in the National Defense University (NDU) Student Management System (SMS), Student Data Files and DataMart Database - Accepted

Thank you for completing a review of Social Security Number (SSN) use within this system. The Defense Privacy, Civil Liberties and Transparency Division (DPCLTD) has reviewed this request and has accepted your justification to use the SSN for the purpose of (3) Security Clearance Investigation or Verification, to verify the security clearance information of non-Department of Defense (DoD) personnel via the Joint Personnel Adjudication System (JPAS) prior to enrollment. This Acceptable Use does not apply to DoD personnel whose security clearance information can be retrieved using the EDIPI / DoD ID number. Also, Acceptable Use (13) Other Cases, was accepted. The SSN is recognized as appropriate to include on transcripts. This system must be reviewed on a continuous basis and a new justification must be provided if any change to the system is submitted.

Acceptable Use (12) Operational Necessity, was not approved. This Acceptable Use is reserved exclusively for Combatant Commands.

Please note, DPCLTD recognizes NDU's SSN mitigation plan and looks forward to seeing it implemented in 2021.

While this system has been identified as requiring the collection, maintenance and use of the SSN, you must ensure this data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards. Also, please maintain a copy of your justification and this memo in your records.

SSN Justifications must be renewed three (3) years after the date of this memorandum if the associated system has not been updated.

If you have any questions, please contact Mr. Brent Bice at (703) 571-0075 or e-mail, brent.j.bice.civ@mail.mil.

Cindy L. Allard
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cc: WHS/ESD/RPDD