

DAPM-FB

MEMORANDUM THRU Army Privacy Office (AAHS-RDF), 9301 Chapek Rd, Fort Belvoir, VA 22060-5605

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

SUBJECT: Justification for the Use of the Social Security Number (SSN) - Defense Biometric Identification Records System (DBIRS), DITPR # 9533

1. Purpose. This memorandum satisfies the requirements of DoDI 1000.30, "Reduction of the Social Security Number (SSN) Use Within the DoD," requiring justification to collect and use the SSN. The Department of Defense is required to minimize the collection and use of the SSN as a unique personal identifier for individuals.

2. System Description and Operation. DBIRS, or the DoD Automated Biometric Identification System (DoD ABIS), matches and stores biometric data and limited biographic data of foreign nationals collected by global U.S. forces during the course of military operations. Data may also be collected for use in field identification and recovery of persons (or their physical remains) who have been captured, detained, deemed missing, are prisoners of war (POW), or are personnel recovered from hostile control (generally U.S. persons but may include mission partner personnel). DoD ABIS information may be used to issue identify credentials to DoD personnel, administer military detainee operations, and provide reports to the Secretary of Defense on detainee operations. DoD ABIS interfaces and shares biometric data with the Federal Bureau of Investigation's (FBI) Next Generation Identification (NGI) and also exchanges data with other federal authoritative biometric databases. Records are primarily in electronic form, although paper records and reports are also generated.

3. Use Justification.

a. Law Enforcement (LE), National Security, and Credentialing. The SSN is required for LE purposes to share information with FBI and other LE mission partners. In addition, the information is utilized for the Military Accessions Vital to the National Interest (MAVNI) population. DoD ABIS contains the MAVNI population set and includes SSNs for this category of individuals. As the SSN is the primary identifier based upon the Electronic Biometric Transmission Specification (EBTS) standard currently in use by DoD for continuous evaluation (CE) efforts, removal of the SSN from DoD ABIS would hinder CE. Homeland Security Presidential Directive (HSPD) 24 established a Federal framework for applying biometric technologies and the sharing of

data in agency identification and screening processes, which includes biographic data such as the SSN. Nearly every law enforcement application with which DoD ABIS interfaces reports and tracks individuals using the SSN as a primary key. These LE applications include, but are not limited to, the following: state criminal histories, National Crime Information Center (NCIC), Next Generation Identification (NGI), and other FBI records.

b. Security Clearance Investigation or Verification. The initiation, conduct, adjudication, and verification of background investigations and security clearances requires the use of the SSN, which is the identifier linking together all of the investigatory aspects of an individual identity throughout the vetting enterprise.

4. Supporting References. There are no forms used for input of the SSN and no forms generated. DoD ABIS includes identity records established to support automated identification, authentication, and verification. DoD ABIS interfaces with Defense Manpower Data Center (DMDC) systems which use the SSN in their databases. Input for DoD ABIS is EBTS specific files, and the outputs can be a variety of Extensible Markup Language (XML), Text, or EBTS formats. The system category of records includes the SSN. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with the enclosed DoD ABIS SORN (A0025-2 PMG (DFBA)).

5. SSN Collection Authorities. Primary authorities related to the collection of the SSN for law enforcement and security clearance purposes include the following: HSPD-6, Integration and Use of Screening Information; HSPD-11, Comprehensive Terrorist-Related Screening Procedures; HSPD-24 Biometrics for Identification and Screening to Enhance National Security; and National Security Presidential Memorandum 9, Presidential Memorandum on Optimizing the Use of Federal Government Information in Support of the National Vetting Enterprise.

6. Risk Mitigation. Most records do not contain SSNs, and the risk has been mitigated in the remaining cases. The SSN is not included in customer response data, even to include the requesting customer. If required in rare instances, the SSN would be requested along with other related data and would be separately approved for release. While there is an enduring requirement to maintain the SSN in limited circumstances, specific actions have been taken to reduce vulnerability and misuse within the system.

7. Conclusion. DoD ABIS (system name DBIRS) and its successor system, the Biometric Enabling Capability (BEC), contain a limited number of SSNs for operational purposes, and I find this risk to be acceptable.

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8. My point of contact for this action is Mr. Russ Wilson at (703) 571-0388 or <u>russell.l.wilson6.civ@mail.mil</u>.

Encl

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