

September 1, 2023

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND  
TRANSPARENCY DIVISION

THROUGH: *Defense Counterintelligence and Security Agency (DCSA), Policy and Procedures*

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) in the Freedom of Information, Privacy Act (FOI/PA) Records Request for Background Investigations

1. System / Form

The Freedom of Information, Privacy Act (FOI/PA) Records Request for Background Investigations is an information collection completed by individuals submitting Freedom of Information Act (FOIA), Privacy Act, and Amendment record requests to DCSA's Freedom of Information and Privacy (FOI/P) Office for Investigations.

2. Documentation

The Freedom of Information, Privacy Act (FOI/PA) Records Request for Background Investigations is utilized to standardize collection of data elements specific to the types of record requests. Current record requests can be submitted to DCSA FOIP Office for Investigations in a format chosen by the requester. Often, requests are missing data elements which require contact with the requester, thereby adding time to the process. Standardization of the process will increase the volume of perfected requests received and strike an appropriate balance between the burden to the public in submitting a request and the DCSA FOIP Office for Investigations being able to fulfill FOIA, Privacy Act, and Amendment requests in an efficient manner. The SSN allows for interoperability with organizations beyond the DoD, such as the FBI, as it is both the single identifier that links all of the aspects of these investigations together and it continues to be used by other Federal agencies as a primary identifier.

3. Authorized Uses

In accordance with DoDI 100.30, continued use of SSNs for the Freedom of Information, Privacy Act (FOI/PA) Records Request for Background Investigations must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use Cases applicable include the following:

Acceptable Use Case 2.c. (3), Security Clearance Investigation or Verification. The initiation, conduct, 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.

Acceptable Use Case 2.c.(8), Computer Matching. It applies to "systems, processes, or forms that interact with other Government agencies [that] may require the continued use of the SSN as a primary identifier [for] transferring, matching, or checking information." DCSA must

use SSNs for operational necessity to effectively interface current data received from the Personnel Vetting System which continues to use the SSN as a primary identifier.

4. The system of records notice (SORN) currently applicable to the Freedom of Information, Privacy Act (FOI/PA) Records Request for Background Investigations is DUSDI 02-DoD, NBIS, Personnel Vetting Records System.
5. A thorough effort has been made to evaluate the risk associated with use of the SSN on the form. 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 Charles (Skip) Watters at 724/794-5612 x7484 or Charles.Watters@nbib.gov.



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