

## OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

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MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY DIVISION, OFFICE OF THE DEPUTY CHIEF MANAGEMENT OFFICER

THROUGH: RECORDS, PRIVACY AND DECLASSIFICATION DIVISION, EXECUTIVE SERVICES DIRECTORATE, WASHINGTON HEADQUARTERS SERVICE

SUBJECT: Justification to Collect Social Security Numbers (SSN) on DD Form 2656

This memorandum is provided to satisfy the requirements of Office of the Under Secretary of Defense (OUSD) Personnel and Readiness (P&R) Directive-Type Memorandum (DTM) 07-015-USD(P&R), "DoD Social Security Number (SSN) Reduction Plan," requiring justification to collect and use the Social Security Number (SSN) on DD Form 2656, "Data for Payment of Retired Personnel".

The DD Form 2656 is used to collect information needed to establish a retired/retainer pay account for members of the Uniformed Services who are retiring or reaching the age of eligibility to receive retired pay, including designation of beneficiaries for unpaid retired pay, state tax withholding election, lump-sum of retired pay election, information on dependents, and election of Survivor Benefit Plan coverage. The collection of a member's SSN is required for the following reasons:

- a. Service members have been historically identified by their SSN as that member's Geneva Conventions Serial Number. Many members completing this form will not have served during the period since the DoD has initiated conversion to the other unique identifiers.
- b. Information entered on this form is used for interactions with financial institutions that identify individuals by their SSN.
- c. Information entered on this form must be reported to the Internal Revenue Service and the Social Security Administration using the SSN as the Federal Taxpayer Identification Number.
- d. Many legacy systems used by the military Services and the Defense Finance and Accounting Service (DFAS) use SSNs as individual identifiers. While modernization of these systems is in progress, the form must be used with complete SSNs until all systems can be updated. The SSNs entered on this form cannot be truncated without the risk of misidentifying the member, nor can it be masked as the form is used in a paper format.

In addition, continued collection of the SSN for spouses and dependent children (if applicable) is necessary in order to correctly identify eligible beneficiaries for SBP benefits. Collection of SSN for this population is justified under DoD Instruction 1000.30, Enclosure

2, paragraph 2.c.(13) as an "other case" as this collection is not covered in subparagraphs 2.c.(1) through 2.c.(10) of that issuance.

The data collected is covered by the DFAS System of Records Notice T7347b, available at: <a href="https://www.federalregister.gov/documents/2009/01/07/E9-41/privacy-act-of-1974-systems-of-records">https://www.federalregister.gov/documents/2009/01/07/E9-41/privacy-act-of-1974-systems-of-records</a>, "Defense Military Retiree and Annuity Pay System." The paper forms are secured to protect Personally Identifiable Information (PII) in accordance with DoD regulations.

If you have any questions, my point of contact is CDR Julie Daughety. She may be reached at (703) 692-2895, or julie.s.daughety.mil@mail.mil.

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Director of Military Compensation Policy

(Military Personnel Policy)