



**DEPARTMENT OF THE AIR FORCE**  
**AIR UNIVERSITY (AETC)**

27 July 2023

MEMORANDUM FOR DIRECTOR, PRIVACY, CIVIL LIBERTIES, AND FREEDOM OF  
INFORMATION

FROM: Holm Center/CC  
130 West Maxwell Blvd  
Maxwell AFB AL 36112

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) in the Web Intensive  
New Gains System (WINGS), ITIPS ID BI0006CP, UII 000003846, DITPR ID 2509

1. WINGS is an Air Force system used by Air Force Junior Reserve Officer Training Corps (AFJROTC), Air Force Reserve Officer Training Corps (AFROTC), and Air Force Officer Training School (OTS) to verify, train, evaluate, track cadet information and to pay instructors, schools, and cadets to support the Holm Center mission to commission officers into the United States Air Force. WINGS interfaces with Air Force systems necessary for instructor, cadet, and school information verification and payment processing.
2. Documentation references are listed in support of the SSN collection requirements for each of the Holm Center's programs.
  - a. AFJROTC. As documented in the following, SSN information is collected from instructor applicants to verify employment eligibility, complete security clearance investigations, childcare background checks and ensure the Air Force cost share for an employed AFJROTC instructor is properly reimbursed to a school district:
    - (1) System of Record (SORN) F036 AETC B, *Air Force Junior ROTC (AFJROTC) Applicant/Instructor System*
    - (2) 10 U.S.C. (United States Code) 9013, *Secretary of the Air Force implementing JROTC Air Force Instruction 36-2010, Junior Reserve Officers' Training Corps Program*
    - (3) 10 U.S.C. 2031, *Junior Reserve Officers' Training Corps*
    - (4) 10 U.S.C. 2033, *Instructor Qualifications*
    - (5) DoD Instruction 1205.13, *Junior Reserve Officers' Training Corps (JROTC) Program*
    - (6) Executive Order 9397, *Numbering System for Federal Accounts Relating to Individual Persons*
  - b. AFROTC. As documented in the following, SSN information is collected from high school students applying for Air Force scholarships to verify identity and eligibility. After a scholarship is awarded, information is used to pay university tuition, expenses, student stipend, and for accession into the United States Air Force:
    - (1) System of Record (SORN) F036 AETC X, *College Scholarship Program (CSP)*
    - (2) 10 U.S.C. 2103, *Eligibility for Membership*
    - (3) 10 U.S.C. 2104, *Advanced Training, Eligibility for*

- (4) 10 U.S.C. 2107, *Financial Assistance Program for Specially Selected Members*
- (5) 10 U.S.C. 103, *Senior Reserve Officers' Training Corps, as implemented by the Air Force Reserve Officers' Training Corps Instruction 36-2011, Air Force Reserve Officer Training Corps*
- (6) 10 U.S.C. 33, *Original Appointments of Regular Officers in Grades Above Warrant Officer Grades*
- (7) Executive Order 9897, *Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service*
- (8) Executive Order 9397, *Numbering System for Federal Accounts Relating to Individual Persons*

c. OTS. As documented in the following, SSN information is collected to verify students attending and graduating from Air Force Officer Training School (OTS) to become officers in the United States Air Force:

- (1) System of Record (SORN) F036 AETC K, *Officer Training School Flight Training Information System*
- (2) DoD 0005, *Defense Training Records*
- (3) 10 U.S.C. 33, *Original Appointments of Regular Officers in Grades Above Warrant Officer Grades*
- (4) 10 U.S.C. Chapter 957, *Schools and Camps*
- (5) Executive Order 9897, *Amendments to Regulations Relating to Commissioned Officers and Employees of the Public Health Service*
- (6) Executive Order 9397, *Numbering System for Federal Accounts Relating to Individual Persons*

3. Justification for use of the SSN in accordance with the DoDI 1000.30, Enclosure 2, are as follows:

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. WINGS uses the SSN for instructor and cadet background investigations, security clearance applications, and to acquire Common Access Cards (CAC).

2.c.(5) Confirmation of Employment Eligibility. Federal statute requires that all persons employed within the United States provide an SSN or comparable identifier to prove that they are eligible to work for or with the U.S. Government. Any system that deals with employment eligibility may contain the SSN. WINGS uses the SSN to verify employment eligibility for instructors.

2.c.(8) Computer Matching. Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information. WINGS interfaces with other DoD Systems

that require the use of the SSN to provide computer matching between systems as verification of an individual's identity.

2.c.(11) Legacy System Interface. WINGS interfaces with many DoD systems of record that have not transitioned to the DoD ID Numbers as a unique identifier and require the SSN be provided.

a. Migration Plan for Acceptable Use 2.c.(11) only. The use of the SSN as a requirement, allowed by the acceptable use cited above, must continue until the DoD systems/applications to which they are linked move to some other identifier as a primary means of transferring, matching, or checking information. WINGS uses a unique identifier that does not include the SSN and only uses the SSN when required by other DoD systems/applications. When linked systems move to another unique identifier, WINGS will remove the SSN from the interface. The SSN in WINGS is hidden or masked and only those with required security are allowed to access the SSN.

4. For questions related to this memorandum, please contact Ms. Pamela Richerson at (334) 953- 8171 or email [pamela.richerson@us.af.mil](mailto:pamela.richerson@us.af.mil).

HOUSTON R. CANTWELL  
Brigadier General, USAF  
Commander