



OFFICE OF THE ASSISTANT TO THE SECRETARY OF DEFENSE FOR
PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY

1155 DEFENSE PENTAGON
WASHINGTON, DC 20301-1155

September 5, 2024

Ref: SSNJ-2024-0001-NDU

MEMORANDUM FOR THE OFFICE OF CHIEF INFORMATION, NATIONAL DEFENSE
UNIVERSITY

SUBJECT: Justification for the Use of Social Security Numbers in the National Defense University (NDU) Student Management System (SMS) called "NDU Connect," Student Data Files, and DataMart database - Approval

Thank you for completing a review of Social Security Number (SSN) use within the subject system. My office has reviewed and approved your request to use the SSN for the following Acceptable Use: (13) Other Cases. Note, SSN use is approved indefinitely or until the establishment of a reasonable alternative for the collection of data other than the SSN such as the Department of Defense Identification Number, the program's mission changes thus eliminating the need for the SSN use, or the system is decommissioned.

NDU Connect is an integrated digital platform designed for managing student information, academic records, and other administrative functions. The SSN is used to register students and generate their official transcripts, and is the unique identifier used to provide accurate data on each student to verify the academic record (e.g., course grades, length of enrollment, etc.). The NDU Registrar uses student SSNs to verify a student's identity to ensure the integrity of each student's academic record, that is, that each course and grade reflected in each student's transcript belongs to that student. NDU's accrediting body, the Middle States Commission on Higher Education (MSCHE), requires the SSN. Accurate student data is essential for institutions accredited by MSCHE for several reasons such as compliance and reporting, institutional planning and assessment, and financial aid enrollment. Removing the use of the SSN impacts identification, data integrity, and federal reporting requirements including to the Department of Education. Furthermore, the submission notes several legacy system interfaces with plans to transfer those systems to NDU Connect by mid-2027.

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. Please maintain a copy of your justification and this approval in your records.

The reference number for this action is listed at the top of this memorandum. If you have any questions, my point of contact is Mr. Joseph Redd at joseph.redd3.civ@mail.mil.

Ms. Rahwa A. Keleta
Director, Privacy and Civil Liberties

cc:
NDU Privacy Office