

## DEPARTMENT OF DEFENSE DEFENSE HUMAN RESOURCES ACTIVITY DEFENSE MANPOWER DATA CENTER

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

SUBJECT: Justification for the Use of Social Security Numbers in the National Security Education Program Information Technology System, DITPR #14164

This memorandum is to satisfy the requirements of the Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD," requiring justification to collect and use the SSN in the National Security Education Program Information Technology (NSEP-IT) System.

The NSEP-IT system is used by the National Security Education Program (NSEP) to track and record scholarship and fellowship recipients' progress in fulfilling their federal service requirements as mandated by federal law (50 U.S.C. §1902, section (b)). NSEP award recipients, who are not in compliance with the terms and conditions of their service agreement, are reported to the U.S. Department of Treasury for collection in order to recoup funds in accordance with 50 U.S.C. §1902. The Department of Treasury requires the SSN as a unique identifier of the debtor in order to conduct computer matching against their records. The use case justifying the collection of the SSN in NSEP-IT falls under acceptable use case (8) Computer Matching, in accordance with DoDI 1000.30, Enclosure 2, paragraph 2.c.

Additionally, as all NSEP-IT scholarship and fellowship recipients whose data is collected and stored in the system are students, these awardees do not have DoD or other federal identification numbers that could be substituted for the SSN. While federal employment is the ultimate goal for all award recipients, awardees, at the time of the creation of their record, do not have a DoD or other federal identification number. Randomly generated database identification numbers cannot serve as a substitute for the SSN as individuals may receive multiple awards and a consistent unique identifier is required to ensure these awards are linked to the proper individual.

The data collected is covered by System of Records Notice Defense Human Resources Activity (DHRA) 09, National Security Education Program, which provides the authorities to collect this information, and is available at:

https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570561/dhra-09/. The SSN, along with other personnel data information, is securely collected, stored, and managed in accordance with DoD 5400.11-R, "Department of Defense Privacy Program."

DHRA remains committed to continuously monitoring and evaluating the NSEP-IT program and safeguarding the privacy of individuals whose information is contained in the system remains a priority. My point of contact for this matter is the DHRA Component Privacy Officer, Mr. Samuel Peterson, samuel.m.peterson2.civ@mail.mil, (571) 438-1951.

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