



## DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 EAST 56TH STREET  
INDIANAPOLIS, IN 46249-0201

February 2, 2018

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

THROUGH: RECORDS, PRIVACY & DECLASSIFICATION DIVISION (RPDD)

SUBJECT: Justification for Use of Social Security Number (SSN) – Department of Defense (DD) Form 2789, Waiver/Remission of Indebtedness Application

1. This memorandum is written to satisfy the requirement established in the DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD" that requires justification of the collection and use of the SSN on DD Form 2789.
2. The DD Form 2789 includes the name, address, SSN, signature of the individual requesting the waiver or remission, and other information related to the debt. This information along with the narrative request for waiver/remission of indebtedness, will be used to determine the individual's eligibility for a waiver or remission. It is also used in approving or disapproving the request. Data on the individual requesting the waiver or remission, including SSN that is used to validate the debtor's identity, is required to be collected on this form because these records are used to support the Debt Collection Act of 1982 (as amended by the Debt Collection Improvement Act of 1996). The information collected is provided to commercial credit reporting agencies as defined in 15 United States Code (U.S.C.) 1681, Fair Credit Reporting Act or 31 U.S.C. 3701(a)(3), Federal Claims Collection Act of 1966, to aid in the collection of outstanding debts owed to the Federal government.
3. Collection of the SSN meets acceptable use 2c. (4), Interactions With Financial Institutions and paragraph 2c. (11), Legacy System Interface. The SSN is the primary identifier utilized in legacy systems and is required for interaction with financial institutions. Both of these interactions are necessary to properly validate the financial health of the individual.
4. The SSN cannot be truncated without the risk of misidentifying the individual, nor can it be masked since the form is used in a paper format. If the Defense Finance and Accounting Service (DFAS) did not collect the SSN from the individual, there is a risk that the request for waiver or remission would not be processed in accordance with the applicable statutes (10 U.S.C. 1442, 1453, 2774, 4837, 6161, 9837, 32 U.S.C. 716, and 5 U.S.C. 5584).
5. The individual completes a portion of the DD Form 2789 and the remainder of the form is completed by the appropriate finance office before forwarding to the DFAS, Debt and Claims Management office for processing. The paper forms and copies of the form are secured to protect Personally Identifiable Information in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) responsible for servicing the record in performance of their official duties

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and individuals who are properly screened, cleared and possess a need-to-know. The data on this form is covered by System of Records Notices:

T7332, Defense Debt Management System  
(<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570181/t7332/>), DITPR #32.

T7335, Defense Civilian Pay System  
(<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570184/t7335/>), DITPR #93.

T 7340, Defense Joint Military Pay System – Active Component  
(<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570191/t7340/>), DITPR #92

T7344, Defense Joint Military Pay System – Reserve Component  
(<http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570195/t7344/>), DITPR # 244

6. The SSN will no longer be a required element on the DD Form 2789 once a method is implemented of systemically identifying an individual that does not require the use of the SSN.

7. The point of contact for this action is Ms. Renay Pegg. She may be reached by phone at (317) 212-1399 or via email at [renay.r.pegg.civ@mail.mil](mailto:renay.r.pegg.civ@mail.mil).

Linda A. Marvin  
Director, Accounting Policy

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