



**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

THROUGH: DEFENSE MANPOWER DATA CENTER PRIVACY OFFICE

SUBJECT: Justification for the Use of Social Security Numbers - Defense Sexual Assault
Incident Database Department of Defense Information Technology Portfolio
Repository Identification Number 11499

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," that requires justification of the collection and use of the Social Security Number in the Defense Sexual Assault Incident Database (DSAID).

Public Law 110-417, the Duncan Hunter National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2009, required that the DoD develop a centralized, case-level database for the collection and maintenance of information regarding sexual assaults involving a member of the Armed Forces. To fulfill this requirement, as well as the reporting requirements outlined in 10 United States Code (U.S.C.) 113 note, "DoD Policy and Procedures on Prevention and Response to Sexual Assaults Involving Members of the Armed Forces," the Department developed and deployed DSAID. As the system of record for the Annual Report to Congress on Sexual Assault in the Military, DSAID maintains information (if available) about the nature of the assault, the victim, the alleged offender, investigative information, and case outcomes in connection with the assault. Under 10 U.S.C. 932, DSAID is also required to include information on the claims of retaliation connected with an Unrestricted Report of sexual assault made by or against a member of the Armed Forces. Additionally, DSAID will now maintain data on assaults committed by a member of the Armed Forces against the member's spouse or other family member, per Section 538 of Public Law 115-91, NDAA for FY 2018.

As documented in the DSAID System of Records Notice (DHRA 06) and Privacy Impact Assessment, the SSN is collected and maintained in DSAID from victims and/or alleged perpetrators in a sexual assault as part of an Unrestricted Report (reports that trigger an investigation). The SSN may also be collected from retaliation reporters when there is claims of retaliation in connection with an Unrestricted Report of sexual assault made by or against a member of the Armed Forces. This information is collected, as appropriate, via the DD Form 2965 (DSAID Data Form), DD Form 2910 (Victim Reporting Preference Statement), DD Form 2910-1 (Replacement of Lost DD Form 2910, Victim Reporting Preference Statement), and DD Form 2910-2 (Retaliation Victim Reporting Preference Statement) and utilized by Sexual Assault Response Coordinators for case creation and entry.

DD Form 2910 series, including 2910, 2910-1, and 2910-2, are stored in DSAID in their entirety, within the DSAID File Locker. The DSAID File Locker provides a central and secure record retention capability to ensure compliance with federal requirements and allow victims, retaliation reporters, and Catch A Serial Offender “CATCH” participants to access these forms for potential use to include accessing Department of Veterans Affairs benefits applications and the identification of serial sexual assault offenders. The DD Forms 2910, 2910-1 and 2910-2 for Unrestricted Reports are maintained in a searchable format, whereas statements for the Restricted Reports are maintained in a non-searchable format and can only be accessed with an encryption key. The last four of the SSN, date of birth, mother's maiden name, and state or country of birth may be maintained as an encryption key to grant victims access to their Restricted Report records.

The use case justifying the collection of the SSN in DSAID is “Legacy System Interface” as outlined in DoDI 1000.30, Enclosure 2, paragraph 2c (11). DSAID must interface weekly with the Department of the Army Law Enforcement Reporting and Tracking System, the Department of the Navy Consolidated Law Enforcement Operations Center, and the Department of the Air Force Investigative Information Management System to capture case investigation data required for congressional reporting. These legacy systems report and track individuals, and make application information available to other agencies through the use of the SSN. DSAID must, therefore, continue to collect the SSN to allow for data matching and verification to be conducted to ensure the correct sexual assault case information is being pushed from the Military Criminal Investigative Organizations (MCIO) systems to DSAID. Once the legacy MCIO systems transition from the use of the SSN to another primary form of identification (e.g. the DoD Identification Number), DSAID will also transition from the use of the SSN. This office, in coordination with the DSAID Change Control Board, will continue to assess options for removal of the SSN as they become available.

The data collected is covered by the System of Records Notice DHRA 06 DoD, “Defense Sexual Assault Incident Database (DSAID),” which provides the authorities to collect, and is available at: [DHRA-06-DoD.pdf \(defense.gov\)](#).

The Defense Human Resource Activity (DHRA) remains committed to continuously monitoring and evaluating the DSAID program and safeguarding the privacy of individuals whose information is contained in the system, in accordance with the Privacy Act of 1974 and DoD 5400.11-R, “Department of Defense Privacy Program”. My point of contact for this matter is the DHRA Component Privacy Officer, Mr. Samuel Peterson, (571) 438-1951, samuel.m.peterson2.civ@mail.mil.

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Director