



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
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WASHINGTON, D.C. 20301-4000

December 11, 2024

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 Problematic Sexual Behavior in Children and Youth Information System, DITPR ID #29674

The Problematic Sexual Behavior in Children and Youth (PSB-CY) Information System supports the requirements of Public Law 115-232 Section 1089, Policy on Response to Juvenile-on-Juvenile Problematic Sexual Behavior Committed on Military Installations. This Public Law mandated the establishment of a centralized database of information on incidents of problematic sexual behavior in children and youth on military installations. The PSB-CY Information System captures inputs from multiple DoD agencies, thereby consolidating and tracking record-level information for each allegation or report of PSB-CY reported to the Department and reviewed by the Family Advocacy Program (FAP). Tracking in the PSB-CY Information System spans the full life-cycle of an allegation or report from the receipt of the referral or allegation to case closure. The full life-cycle begins with: consolidating and tracking the referral from the time of the allegation or report to the FAP; categorizing the sexual behavior as normative, cautionary, or problematic; convening the PSB-CY multi-disciplinary team when warranted; and coordinating or providing services through a continuum of care to resolution and closure.

In accordance with DoDI 1000.30, the collection of the social security numbers (SSNs) within PSB-CY meets Acceptable Uses (2) Law Enforcement, National Security, and Credentialing, as the PSB-CY Information System collects data from Military Criminal Investigative Organizations (MCIOs) for the purpose of consolidating and tracking record-level information for each incident of PSB-CY reported to the Department. Per DoD Manual 6400.01, Volume 1, "Family Advocacy Program (FAP): FAP Standards," FAP must communicate all reports of PSB-CY to the appropriate law enforcement agency within 24-hours. Upon referral by FAP, the MCIO provides the SSN of the exhibiting and impacted children back to the FAP program official as part of the MCIO referral documentation, as the SSN is the unique identifier assigned to the case by the MCIO. This information is recorded by the FAP program official within PSB-CY to facilitate future communication with the MCIO on the case, which may be required throughout the continuum of care for such matters as:

- Engagement of a child (exhibiting and/or impacted) in the juvenile justice system due to charges being pressed by a parent or legal guardian;
- An order of protection (or equivalent) being sought by a parent or legal guardian;
- Engagement with a child who has exhibited in one or more additional incidents of problematic sexual behavior(s); or
- Engagement with a child where there is a reasonable suspicion that adult initiated sexual abuse has occurred.

Indeed, per 34 U.S.C. 20341 and 28 CFR 81.2, FAP must also coordinate with all appropriate law enforcement agencies, MCIOs, and Child Welfare Service agencies in response to reports of child abuse incidents.

As the DoD MCIO systems continue to utilize the SSN as the unique identifier for case management purposes, SSN utilization within the PSB-CY Information System cannot be eliminated. At such time as the MCIOs transition away from use of the SSN, PSB-CY will initiate plans to transition as well.

The Office of the Under Secretary for Defense for Personnel and Readiness (OUSD(P&R)) is committed to safeguarding the privacy of individuals whose information the Department collects. Personally identifiable information maintained within this system is covered by System of Records Notices (SORN), DPR 50 which is available at: <https://www.federalregister.gov/d/2021-18025>. To mitigate SSN exposure PSB-CY operates within an Impact Level (IL) 5 with SSN data encrypted in transit and at rest. My point of contact for this matter is the OUSD(P&R) Privacy, Civil Liberties, and FOIA Officer, Ms. Jessica Levin, jessica.m.levin.civ@mail.mil, (202) 815-1083.

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