

May 27, 2025

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND FREEDOM OF INFORMATION DIRECTORATE

THROUGH: *DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY, OFFICE OF PRIVACY, CIVIL LIBERTIES, AND FREEDOM OF INFORMATION*

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) on the Specific Authorization for Disclosure of Financial Information (DCSA 343) and Specific Authorization for Release of Behavioral Health and Related Medical Information (DCSA 344).

1. Form / Description

The DCSA 343 and 344 are special consent forms which will be used to collect specific information during the background investigation process. The information collected is vital to determinations about whether the subject of the investigation should be adjudicated to be eligible for logical and physical access to Government facilities and systems; suitable or fit for Federal employment; fit to perform work on behalf of the Federal Government under a Government contract; eligible to hold a position that is sensitive for national security reasons; or eligible for access to classified information. Use of these forms will be strictly limited to the circumstances defined within and required by the Federal Personnel Vetting Investigative Standards; and DCSA's ability to conduct effective and thorough investigative checks would be compromised absent the use of the DCSA 343 and 344. DCSA is authorized to seek this information based on section 925 of Public Law 115-91; and, Executive Order 13467, as amended by Executive Order 13869.

The DCSA 343 will allow the DCSA access to certain financial records which are not otherwise accessible because they are protected under the provisions of the Right to Financial Privacy Act. The information collected on the DCSA 343 will be used to conduct a focused investigative check with the specific financial entity noted on the form, and will only be used when financial information cannot be obtained solely with the Standard Form (SF) *General Authorization for Release of Information*.

The DCSA 344 will allow the DCSA access to certain restricted medical records which are not otherwise accessible because they are protected under the Health Insurance Portability and Accountability Act (HIPAA). The information collected on the DCSA 344 will be used to conduct a detailed medical interview and record review with the specific practitioner noted on the form when the practitioner indicates on the SF *Authorization for Medical Release of Medical Information Pursuant to the HIPAA* that the subject of the investigation has a condition or treatment that could impair judgement, reliability, or trustworthiness; there is evidence of alcohol-related treatment or counseling; or there is evidence of drug-related treatment or counseling.

2. Documentation

The DCSA 343 and 344 are new information collections, not yet approved by OMB. These

forms will be covered by the *Personnel Vetting Records System*, DUSDI 02-DoD, system of records (October 17, 2018; 83 FR 52420; [2018-22508](#)).

The DCSA 343 and 344 will be maintained in the OPIS Imaging system, and DCSA retains an approved DD2930 Privacy Impact Assessment (PIA) for this IT System.

3. Authorized Uses

In accordance with DoDI 100.30, Reduction of Social Security Number (SSN) Use Within DoD, the use of the SSN on the DCSA 343 and 344 is justified by *Acceptable Use Case 2.c.(3)*:

Acceptable Use Case 2.c. (3), Security Clearance Investigation or Verification. The initiation, conduct, adjudication, verification, quality assurance, and billing fund control of background investigations and security clearances requires the use of the SSN. The SSN is the single identifier that links all aspects of these investigations together. This use case is also linked to other Federal agencies that continue to use the SSN as a primary identifier.

The SSN, on both the DCSA 343 and 344, allows for interoperability with financial entities and medical providers as it is the single identifier the record providers rely upon to match the identity of the investigative data subject to their client/patient to ensure proper records are retrieved and disseminated to DCSA as part of the subject's background investigation. Due to the sensitive nature of the records sought, it is imperative that identification be validated beyond a basic name or name/DOB match. Use of the SSN is critical for proper identity validation which minimizes the risk of errant disclosure by the record provider, and it ensures the DCSA does not collect records about individuals who are not the subjects of investigation.

Beyond initial information collection, identity validation, and record collection, use of the SSN is necessary to perform proper storage and retrieval activities. Furthermore, delivery of the complete investigative product, subsequent adjudication determinations, and billing fund controls are all also properly executed due to the use of the SSN on/within background investigation records. The SSN is the single identifier that links all aspects of the investigation process together.

4. Citation and Migration

Citation of statutory requirement for the use of the SSN is not applicable to the DCSA 343 or 344. A plan of Action for the migration from/elimination of the SSN on the DCSA 343 or 344 is not applicable due to the reasons noted above.

With the SSN is the single identifier that links all aspects of the investigation process together, the DoD ID (EDI-PI) is not an adequate or appropriate substitute for the SSN. Not all investigation data subjects are DoD affiliated, the DoD ID is not an identifier used by financial entities or medical providers, and records are not stored or retrieved within DCSA or customer agency personnel vetting IT systems by the DoD ID number.

The DCSA is seeking indefinite approval for use of the SSN on these forms; or, approval for continued use until the DCSA's investigative mission changes thus eliminating the need for SSN use, or the form is superseded or obsolete.

5. Safeguards

A thorough effort has been made to evaluate the risks associated with use of the SSN on the DCSA 343 and 344. Administrative, technical, and physical security controls are in place as described in the PIA to prevent unauthorized access and unauthorized disclosures of the SSN.

Only authorized personnel with a need to know will have access to the forms, and it will not be routine practice to mail a completed DCSA 343 or 344. The forms will either be completed hardcopy, in-person and given directly to an authorized DCSA official or record provider, or sent via DoD SAFE. Additionally, hardcopy and electronic copies will be disposed of in compliance with the DCSA approved records disposition schedule (DAA-0446-2019-0004).

5. Point of Contact

For questions related to this memorandum contact Lisa M. Alleman at 724-636-1856 or Lisa.M.Alleman2.civ@mail.mil.

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