DEFENSE COUNTERINTELLIGENCE AND SECURITY AGENCY
OFFICE OF PRIVACY, CIVIL LIBERTIES, AND FREEDOM OF INFORMATION
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April 23, 2026

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) in Enterprise Service Delivery (ESD), DITPR ID # 72686

1. System Description

The ESD capability (formerly known as Customer Relationship Management [CRM]) is a private label/instance of the cloud-based ServiceNow Software as a Service (SaaS) platform. DCSA utilizes ESD to provide case, billing, and administrative management for customer support, mission, and business functions.

2. Documentation

As documented in the Privacy Impact Assessment (PIA), ESD collects PII (Personally Identifiable Information), including SSN, for verification, validation, identification, authentication and data matching to support work involving mission operation and functions. These collections are covered by multiple SORNs, each noted with the PIA.

3. Authorized Uses

Use of SSN for ESD are authorized by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use Cases applicable include the following:

> *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 of the 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.
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> *Acceptable Use Case 2.c. (13) Other Cases.* The previous categories may not include all uses of the SSN authorized by law. Should an application owner be able to show sufficient grounds that a use case not specified in subparagraphs 2.c. (1) through 2.c. (12) of this enclosure is required by law, that use case may continue to use the SSN. Any application that seeks to use this clause as justification must provide specific documentation in order to continue use in accordance with this provision.

PII, including the SSN is collected for verification, validation, identification, authentication, and

data matching to support work involving a variety of mission operations and functions.

The use varies based on the collection authorization and needs to fulfill business operations for the respective mission area (e.g. HR, Labor/Employee Relations, Personnel Vetting, Personnel Security, Insider Threat, Inspector General, General Counsel, Cybersecurity, Acquisitions, Billing, Budget, FOIA and Privacy Act, etc.). The SSN is used in limited applications with a casework-based need and is not collected or maintained in all instances.

4. Citation and Migration Plan

SSN is the primary identifier used by other government agencies; the DoD ID is not a suitable replacement for the SSN in the related process due to this. Should the SSN no longer be used as the primary identifier by other agencies, DCSA will reassess use of the SSN.

5. Safeguards

Only authorized personnel with a need to know will have access to the form. Privacy Act cover sheets will be used to protect documents in work areas. Paper and electronic copies will be disposed of as required by the records disposition schedules. Access to the SSN will be permissions restricted to stakeholder use cases. The role-based constraints will be applied to each instance, role and meta data associated with the SSN.

6. Point of Contact

For questions related to this memorandum contact Diane Brooks-Woodruff at diane.a.brooks-woodruff.civ@mail.mil, and as an alternate Taria M. Gibbs at taria.m.gibbs.civ@mail.mil.

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