



DOE Guidance on the Use of the SSN

(February 2009)

Acceptable Uses

- The acceptable uses of the Social Security number (SSN) are those that are provided for by law, Executive Order, regulation, or are required by DOE operational necessities. Those systems, processes, or forms that claim “operational necessity” shall be closely scrutinized by senior program management. The use of the SSN shall be primarily limited to transactions that specifically require the presentation of the SSN to meet a legal or regulatory requirement. Most applications that require the SSN for specific transactions do not require its use for every transaction.
- Executive Order (E.O.) 13478, Amendment to Executive Order 9397 (E.O. that established the use of SSNs) Relating to Federal Agency Use of Social Security Numbers removed a requirement for agencies to use SSNs as individuals’ unique identifiers. What follows are general categories of use that may continue to be acceptable for the SSN. The fact that a SSN use case may marginally meet one or more of the justifications does not necessarily mean that a specific justification is acceptable. Any transaction that includes transfer or presentation of the SSN should be closely scrutinized to determine if some alternative form of identification may suffice.
 - Law Enforcement, National Security, Credentialing. Law enforcement applications currently must be able to report and track individuals through the use of the SSN. This includes, but is not limited to, checks of the National Crime Information Center and state criminal histories.
 - Security Clearance Investigations or Verification. The initiation, conduct, or verification of security clearances requires the use of SSN.
 - Interactions with Financial Institutions. Federal law requires that individuals who hold accounts with financial institutions must provide the SSN as part of the process to open accounts.
 - Confirmation of Employment Eligibility. Federal statute requires that all persons employed within the United States must provide an SSN or comparable information to prove eligibility to work for the Government.
 - Administration of Federal Worker’s Compensation. The Federal Worker’s Compensation Program continues to track individuals through the use of the SSN.
 - Federal Taxpayer Identification Number. The application of Federal income tax programs rely on the use of the SSN. As such, systems that have any function that pertains to the collection, payment, or record keeping of this use case must contain the SSN.



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- Other Cases. The previous categories may not include all uses of the SSN delineated by law. Should a program be able to demonstrate sufficient grounds that a use case not specified above is required by law or other authority, then that use case may continue to use the SSN. Any application that seeks to use this clause as justification must provide specific documentation to the Privacy Office in order to continue use under this justification.

Documenting Authorized Uses

- Any system, process, or form that collects, transfers, or retains Personally Identifiable Information (PII), which includes SSNs, must properly document the authority for that use. It is unacceptable to collect, retain, or transfer PII without such justification. In addition to the documentation required for the use of PII, the use of the SSN as part of any collection, transfer, or retention must be specifically documented and justified. This documentation shall include the specific legislative requirement for the use of the SSN. Forms, processes, or systems, to include any locally created applications, must be properly documented. Use of PII that is not properly documented may be in violation of Federal law.
- Forms used to collect PII shall be coordinated with the DOE Privacy Office. The forms must be submitted by the program component requiring the PII and include the name and phone number of a person familiar with the collection.
- Documentation for this justification shall be retained and available upon request.

Alternatives

- In cases where SSN use is justified, alternatives should be used to counteract the vulnerability of SSN use. Alternatives include: truncated (e.g., the last four of the number), encryption, other methods to mask the number.

Training

- It is vital to the Department that the collection, retention, storage, use, and disposal of PII/SSN be handled appropriately. To ensure that all personnel are trained, DOE O 206.1, *Department of Energy Privacy Program*, requires that employees be trained at least annually. Privacy training is currently available at the DOE Privacy homepage (<http://management.energy.gov/FOIA/privacy.htm>).