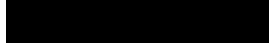


**DEPARTMENT OF HOMELAND SECURITY  
BOARD FOR CORRECTION OF MILITARY RECORDS**

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Application for the Correction of  
the Coast Guard Record of:

**BCMR Docket No. 2024-179**

  
YN2 (former)

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**FINAL DECISION**

This proceeding was conducted according to the provisions of 10 U.S.C. § 1552 and 14 U.S.C. § 2507. The Chair docketed the case after receiving the applicant's completed application on August 14, 2024, and this decision of the Board was prepared pursuant to 33 C.F.R. § 52.61(c).

This final decision, dated May 30, 2025, is approved and signed by the three duly appointed members who were designated to serve as the Board in this case.

**APPLICANT'S REQUEST AND ALLEGATIONS**

The applicant, a former Yeoman second class (YN2) who was honorably discharged on April 2, 1992, asked the Board to correct the social security number (SSN) on her DD Form 214<sup>1</sup>. The applicant stated that after she left the Coast Guard she received a new social security card with a different number and alleged that she was told by the Internal Revenue Service (IRS) that the previous number – the one she used when she joined the Coast Guard – was incorrect. She stated that wrong SSN on her DD 214 creates confusion when applying for federal jobs or anytime she attempts to claim veteran status.

In support of her application, the applicant submitted a copy of her DD Form 214 from 1992 and copies of her two different social security cards. The social security card with her maiden name and the number she used throughout her Coast Guard service is XXX 56 XXXX. The second social security card reflects her married name and the SSN reads XXX 58 XXXX.

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<sup>1</sup> The DD Form 214 provides the member and the service with a concise record of a period of service with the Armed Forces at the time of the member's separation, discharge or change in military status (reserve/active duty). In addition, the form is an authoritative source of information for both governmental agencies and the Armed Forces for purposes of employment, benefit and reenlistment eligibility, respectively. The DD Form 214 is issued to members who change their military status among active duty, reserve, or retired components or are separated/discharged from the Coast Guard to a civilian status. COMDTINST M1900.4D.

Regarding the lengthy delay in submitting her application, the applicant stated that she discovered the alleged error in 1993 but did not request a correction to her record earlier because she “didn’t think that it would prevent employment consideration.”

### **SUMMARY OF THE RECORD**

The applicant served on active duty in the Coast Guard from January 3, 1983 to April 2, 1989, and again from April 3, 1989 to April 2, 1992. Her DD 214s indicate that she was honorably discharged after each period of service and both DD 214s indicate that her SSN is XXX 56 XXXX.

The applicant’s military record contains hundreds of documents displaying her SSN as XXX 56 XXXX. This includes her initial enlistment contract dated December 3, 1982. There are no documents in her military record showing her SSN as XXX 58 XXXX.

### **VIEWS OF THE COAST GUARD**

On April 9, 2025, a Judge Advocate (JA) of the Coast Guard submitted an advisory opinion in which he recommended that the Board deny relief. In doing so, he adopted the findings and analysis provided in a memorandum prepared by the Personnel Service Center (PSC).

PSC recommended that the Board deny relief because her enlistment contract shows that her SSN is XXX 56 XXXX and she did not provide a letter from the IRS or the Social Security Administration verifying the discrepancy of her SSN.

### **PREVIOUS BOARD DECISIONS**

In Docket No. 2017-026, the Board denied relief to an applicant who claimed that the second and third digits of his SSN on his DD 214 were incorrect. In denying relief, the Board stated that he was unlikely to prevail because there was insufficient evidence in the record to support his claim that his SSN is incorrectly recorded on his DD 214. The record showed that he listed his SSN as beginning with X76 on his application for enlistment and that this SSN was used consistently by both the applicant and the Coast Guard. The Board found that this record was presumptively correct,<sup>2</sup> and the copy of the social security card with a different number submitted by the applicant was insufficient to overcome that presumption. Before making such a correction, the Board stated that it would require clear, explicit, and formal documentation from the Social Security Administration stating that the SSN on his DD 214 was incorrect at the time it was issued or that it had been legally voided and changed to the new SSN.

In Docket No. 2017-004, the Board denied relief to an applicant who claimed that the SSN reflected on his DD 214 was off by one digit. The Board ruled that it would not order the Coast Guard to change the SSN on the applicant’s DD 214 without clear, explicit, and formal documentation from the Social Security Administration stating that the SSN shown on his DD 214 was never issued to him or that it was issued to him but has been legally voided and changed to the new SSN.

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<sup>2</sup> 33 C.F.R. § 52.24(b).

### APPLICABLE LAW AND REGULATIONS

Chapter 1.C of Commandant Instruction (COMDTINST) M1900.4C (March 12, 1990), the instructions for completing the DD Form 214, states that Block 3 should contain the member's social security number with the digits properly grouped, i.e., 000 00 0000.

### APPLICANT'S RESPONSE TO THE VIEWS OF THE COAST GUARD

On April 24, 2025, the BCMR sent the applicant a copy of the Coast Guard's recommendation and invited her to submit a response. The Board did not receive a reply.

### FINDINGS AND CONCLUSIONS

The Board makes the following findings and conclusions on the basis of the applicant's military record and submissions, the Coast Guard's submission and applicable law.

1. The Board has jurisdiction concerning this matter pursuant to 10 U.S.C. § 1552. An application to the Board must be filed within three years after the applicant discovers the alleged error or injustice.<sup>3</sup> The applicant was discharged from the Coast Guard on April 2, 1992 and did not submit her application to the Board until May 13, 2022. Moreover, she did not explain the delay in discovering the error nor did she argue why the Board should waive the statute of limitations and consider her request. Thus, her application is untimely.

2. The Board may excuse the untimeliness of an application if it is in the interest of justice to do so.<sup>4</sup> In *Allen v. Card*, 799 F. Supp. 158 (D.D.C. 1992), the court stated that the Board should not deny an application for untimeliness without “analyz[ing] both the reasons for the delay and the potential merits of the claim based on a cursory review”<sup>5</sup> to determine whether the interest of justice supports a waiver of the statute of limitations. The court noted that “the longer the delay has been and the weaker the reasons are for the delay, the more compelling the merits would need to be to justify a full review.”<sup>6</sup> Although the application was not timely filed, it is critically important for any veteran's DD 214 to bear the correct SSN. If the SSN on the DD 214 is incorrect, a veteran may not be able to prove her status as a veteran to potential employers, government agencies, and other entities. Therefore, despite the application's untimeliness, the Board will consider her claim on the merits.

3. The applicant alleged that the SSN on her DD 214s and other military records is erroneous. When considering allegations of error and injustice, the Board begins its analysis by presuming that the disputed information in the applicant's military record is correct as it appears in her record, and the applicant bears the burden of proving by a preponderance of the evidence

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<sup>3</sup> 10 U.S.C. § 1552(b) and 33 C.F.R. § 52.22.

<sup>4</sup> *Id.*; 33 C.F.R. 52.22.

<sup>5</sup> *Allen v. Card*, 799 F. Supp. 158, 164 (D.D.C. 1992).

<sup>6</sup> *Id.* at 164, 165; *see also Dickson v. Secretary of Defense*, 68 F.3d 1396 (D.C. Cir. 1995).

that the disputed information is erroneous or unjust.<sup>7</sup> Absent evidence to the contrary, the Board presumes that Coast Guard officials and other Government employees have carried out their duties “correctly, lawfully, and in good faith.”<sup>8</sup>

4. The record before the Board contains photocopies of two Social Security cards issued to the applicant with slightly different SSNs on them. The first card, XXX 56 XXXX, was clearly issued to the applicant before she enlisted in 1983 because the number appears on both of her DD 214s and on hundreds of documents in her record. The applicant apparently used this SSN exclusively until receiving a new card with her maiden name and the number XXX 58 XXXX.

5. The applicant claims that the second social security card with her current name and the number XXX 58 XXX is her correct SSN. How she acquired this second SSN is unclear. She alleged that she received it after the IRS told her that the SSN on her other card was incorrect, but there is no evidence supporting her account of how she got two SSNs that differ by only one numeral. There is no legal reason for the applicant to have two SSNs, and the Board can only conclude that one of them was issued in error. But the applicant has not proven by a preponderance of the evidence that the SSN with XXX 56 XXXX was issued in error. This SSN appears on the Social Security card in her military record and on all of her other Coast Guard military records. Sometime following her military service she began using a second SSN, with XXX 58 XXXX and a different last name, and it appears that the Social Security Administration has recently issued or re-issued her a card with this second SSN.

6. The SSN on the applicant’s DD 214s and in her military record are presumptively correct,<sup>9</sup> and the applicant has not proven by a preponderance of the evidence that it is incorrect. Her recently issued Social Security card does not prove that the SSN in her military records is erroneous. In addition, the Board’s findings are consistent with previous decisions denying relief to applicants who were unable to explain why they had two different SSNs. Therefore, the Board will not order the Coast Guard to change the SSN on the applicant’s DD 214s and her request should be denied.

7. To prove that she is the same person listed on her DD 214s, the applicant needs the Social Security Administration to issue her a Social Security card with her original SSN or at least acknowledge in writing that she has two valid SSNs or that the SSN shown on her DD 214s have been legally changed to a second SSN. Clearing up this issue through the Social Security Administration would allow the applicant’s two earnings records to be joined, which might increase her future Social Security benefits. To get such documentation and clear up this issue, the Board recommends that the applicant take the following documents to her local Social Security office:

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<sup>7</sup> 33 C.F.R. § 52.24(b); *see* Docket No. 2000-194, at 35-40 (DOT BCMR, Apr. 25, 2002, approved by the Deputy General Counsel, May 29, 2002) (rejecting the “clear and convincing” evidence standard recommended by the Coast Guard and adopting the “preponderance of the evidence” standard for all cases prior to the promulgation of the latter standard in 2003 in 33 C.F.R. § 52.24(b)).

<sup>8</sup> *Arens v. United States*, 969 F.2d 1034, 1037 (Fed. Cir. 1992); *Sanders v. United States*, 594 F.2d 804, 813 (Ct. Cl. 1979).

<sup>9</sup> 33 C.F.R. § 52.24(b).

- The photocopy of her original Social Security card, with her original SSN;
- Her new Social Security card with her new SSN;
- Her DD 214s showing her original SSN;
- Her birth certificate; and
- Her driver's license.

8. The applicant's request to correct the SSN on her DD 214s should be denied, but the Board will reconsider her request if she can submit a letter from the IRS or the Social Security Administration explaining the discrepancy.

**[ORDER AND SIGNATURES ON NEXT PAGE]**

**ORDER**

The application of former YN2 [REDACTED], USCG, for correction of her military record is denied, but the Board will reconsider her request if she can submit a letter from the IRS or the Social Security Administration explaining the discrepancy.

May 30, 2025

