



DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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GC-C

March 24, 2015

MEMORANDUM FOR THE RECORD

FROM: ARMY AND AIR FORCE EXCHANGE SERVICE (EXCHANGE)
OFFICE OF THE GENERAL COUNSEL, COMPLIANCE DIVISION
3911 South Walton Walker Blvd.
Dallas, Texas 75236-1598

SUBJECT: Justification for the Use of the Social Security Number (SSN)

In accordance with the requirement established in Department of Defense (DoD) Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD", this memorandum justifies the collection and continued use of the SSN in the Exchange "Official Personnel Folder" files. This system maintains information as the basic source of factual data about a person's employment with the Exchange which has various uses by Exchange personnel offices, including screening qualifications of employees, determining status, eligibility, and employee's rights and benefits, computing length of service, and other information needed to provide personal services.

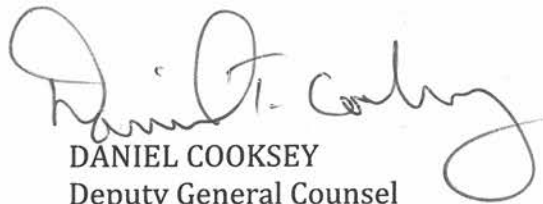
The Official Personnel Folder System is a system of records consisting of information collected from persons affiliated with the Exchange by employment. The information collection requirement is necessary to aid the Exchange management in determining who are qualified applicants for open job opportunities, to produce reports and statistical analyses of the civilian work force strength trends and composition in support of established manpower and budgetary programs and procedures. Information is also utilized in support of Equal Employment Opportunity Program requirements, responding to union requests, identifying training requirements, provide salary data for current and projected fiscal guidance, and provide incentives and promotions. In addition the information within this system may be used by financial institutions for direct deposit or by law enforcement entities for investigations or court actions and to obtain security clearance.

Information contained in this system is solicited by authority of Title 10, U.S.C. §3013 "Secretary of the Army"; Title 10 U.S.C. §8013 "Secretary of the Air Force"; Army Regulation 215-3, "Nonappropriated Funds Personnel Policies and procedures"; Army Regulation 215-8/Air Force Instruction 34-211(I) "Army and Air Force Exchange Service Operations" and E.O. 9397 (SSN) as amended.

Information obtained in this system of files is retrieved by the individual's name or social security number. SSN collected is used to assist in the location of all relevant data associated with the employee which can affect the individual's pay, employment, promotion, or benefits to said employee or his/her dependents and beneficiaries. This and the above uses are consistent with the SSN Instruction Use Case in Enclosure 2 sections 2.c.(2), (3), (4), (5), (6), (7) (8) and (9) of DoDI 1000.30.

The Exchange has taken steps to minimize the risk of unauthorized access to information located in this system of records. Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need to know" who are responsible for servicing the record in performance of their official duties. Persons are properly screened and cleared for access. Access to computerized data is role-based and further restricted by passwords, which are changed periodically. .

The SSN, along with other personal data information, is securely collected, stored, and managed in accordance with the Exchange System of Record Notice (SORN) AAFES 0401.04. A 60-Day Federal Register Notice (FRN) followed by a Paperwork Reduction Act (PRA) are currently being prepared relative to this collection.

A handwritten signature in black ink, appearing to read "Daniel Cooksey", is written over the typed name.

DANIEL COOKSEY
Deputy General Counsel
Office of the General Counsel