



DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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GC-C

21 October 2014

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 "Employee Travel Files". This system maintains information relative to Exchange associates who are authorized to perform official employment travel.

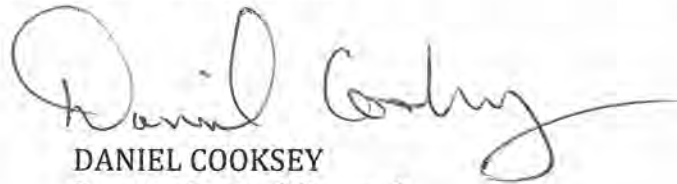
The Employee Travel Files is a system of records consisting of information collected from persons affiliated with the Exchange by employment who travel on official government business. Disclosure of information is mandatory so the Exchange may take steps of determining eligibility of the individual and their dependents to travel, obtain the necessary foreign clearance, and assist in applying for passports, visas and counseling where proposed travel involves visiting or transiting communist countries and danger zones. 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 215-1, The Administration of Morale, Welfare, and Recreation Activities and Non-appropriated Fund Instrumentalities; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN).

Information obtained in this system of files is retrieved by the individual's surname or identifier such as the SSN. SSN collected is used to assist in the location of all relevant data associated with the employee for which may affect that employee's travel, their travel documentation and security clearance. This is consistent with the SSN Instruction Use Case in Enclosure 2 sections 2.c.(3) 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. Paper and electronic records are maintained in controlled areas which are only accessible to authorized personnel. 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 0410.01. 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". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

DANIEL COOKSEY
Deputy General Counsel
Office of the General Counsel