



DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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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 "Personnel Security Clearance Case Files". This system maintains information required for providing security clearance for Exchange employees and contractors.

The Personnel Security Clearance Case Files is a system of records consisting of information collected from persons affiliated with the Exchange by assignment, employment, contractual relationship, or as the result of an interservice support agreement on whom a personnel security clearance determination has been completed, is in process, or may be pending.

The information collection requirement is necessary to aid the Exchange Loss Prevention and Force Security Management in determining and providing security clearance for individuals stationed at an Exchange facilities. This includes providing security clearance, denial of clearance, or removal of clearance into classified locations or sensitive positions.

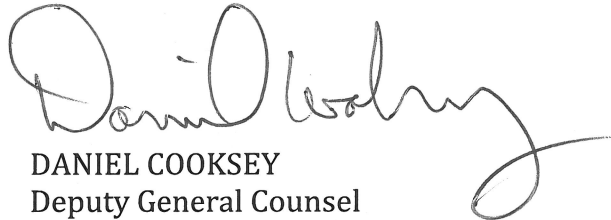
Information contained in this system is solicited by authority of Title 10, U.S.C. §3013 "Secretary of the Army"; Title 10 U.S.C. §8013 "Secretary of the Air Force"; Army Regulation 215-3, "Nonappropriated Funds Personnel Policies"; Army Regulation 215-4, "Nonappropriated Fund Contracting"; Army Regulation 215-8/Air Force Instruction 34-211(I) "Army and Air Force Exchange Service Operations"; E.O. 12065 and E.O. 9397 (SSN) as amended.

Information obtained in this system of files is retrieved by the individual's name. SSN collected is used to assist in the location of all relevant data within the Exchange and outside sources associated with reviewing the individual's criteria, background, and trustworthiness for security clearance and providing such clearance. This is consistent

with the SSN Instruction Use Case in Enclosure 2 sections 2.c.(2), (3), (4), (5), (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. No electronic records are maintained.

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 1703.03. 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 and title.

DANIEL COOKSEY
Deputy General Counsel
Office of the General Counsel