



## DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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GC-C

March 31, 2016

### MEMORANDUM FOR THE RECORD

FROM: ARMY AND AIR FORCE EXCHANGE SERVICE (EXCHANGE)  
OFFICE OF THE GENERAL COUNSEL, COMPLIANCE DIVISION  
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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 "Accounts Receivable Files" of records. This system maintains information relative to debts owed to the government.

The Exchange Accounts Receivable Files is a system of records consisting of information collected from potential, past or authorized Exchange patrons. Disclosure of information is necessary so the Exchange may take steps to process, monitor, and post audit account accounts receivable, to administer the Federal Claims Collection Act, to answer inquiries pertaining thereto, and report to the consumer reporting agencies as an incentive for debtors to repay delinquent Federal government debts. The SSN may be used to search for responsible documents relative to such debt.

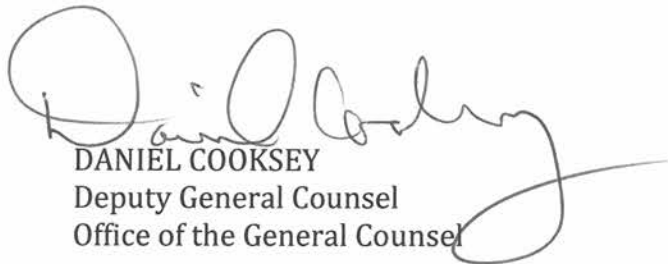
Information contained in this system is solicited by authority of Title 10 U.S.C. §3013, Secretary of the Army; Title 10 U.S.C. §8013, Secretary of the Air Force; Federal Claims Collection Act of 1966 (Pub.L. 89-508, as amended); Debt Collection Act of 1982 (Pub.L. 97-365), as amended by the Debt Collection Improvement Act of 1996 (Pub.L. 104-134, section 31001); Army Regulation 215-8/Air Force Instruction 34-211(I), Army and Air Force Exchange Service Operations; E.O. 9397 (SSN), as amended; 31 CFR 285.11, Administrative Wage Garnishment; DoD 7000.14-R, DoD Financial Management Regulation.

Retrieval of information from this system is by the individual's full name or identifier, such as the SSN. SSN collected is used to open account, locate account, and to correspond with financial institutions and places of employment for the need of garnishing wages, salaries, or to collect credit information. The SSN is also used in regards to taxpayer information. These uses are consistent with the SSN Instruction Use Case in Enclosure 2 sections 2.c.(4), and (7) 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.

Disclosures of information located within this system is pursuant to those permitted under Title 5 U.S.C. §552a(b) of the Privacy Act of 1974, as amended. This may include disclosures to the U.S. Department of Justice/U.S. Attorneys for legal action, the Internal Revenue service to obtain locator status for delinquent accounts, to private collection agencies for collection action, to the Department of the Treasury, Financial Management Service for the purpose of collecting debts, to any employer for garnishment purposes, and to military banking facilities.

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 0702.34. A Paperwork Reduction Act (PRA) is currently being prepared for submission relative to this collection of information.



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