



**DEPARTMENTS OF THE ARMY AND AIR FORCE**  
**ARMY & AIR FORCE EXCHANGE SERVICE**  
**Office of the General Counsel**  
**P.O. Box 650060**  
**Dallas, TX 75265-0060**

GC-C

18 May 2016

**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's "Employee Pay System" and "Personnel Management Information System" (PMIS). These systems maintain information relative to Exchange associates who have been hired or have worked for the Exchange in the past. In addition, it contains information on contracted employees and Local Nationals stationed at OCONUS locations.

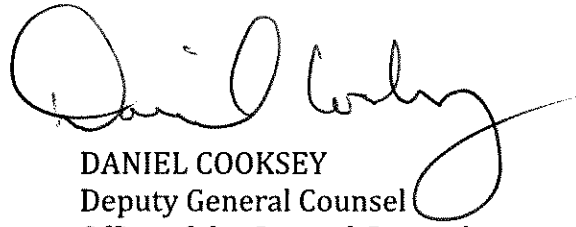
The Employee Pay System and PMIS are systems of records consisting of information collected from persons affiliated with the Exchange by employment who expect to be paid appropriately for their time and accurately receive benefits and leave. Disclosure of this information is mandatory so that the Exchange may take steps of providing the appropriate benefits to beneficiaries of Exchange associates, pay applicable taxes and process bi-weekly payroll. 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; 42 U.S.C. 659, Consent by United States to income withholding, garnishment, and similar proceeding for enforcement of child support and alimony obligations; 31 CFR 285.11, Administrative Wage Garnishment; DoD Directive 7000.14-R, Volume 13 and 16, DoD Financial Management Regulation; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Service Operations; and E.O. 9397 (SSN) as amended. The Exchange retirement plan is governed in accordance with Department of Defense Instruction (DoDI) 1400.25, Volume 1408, DoD Civilian Personnel Management System: Insurances and Annuities for Nonappropriated Fund (NAF) Employees and the Basic Retirement Plan for Employees of the Exchanges Plan document

Information obtained in these systems of files is retrieved by the individual's full name or SSN. SSN collected is used to assist in the location of all relevant data associated with the employee of which may affect his/her pay, benefits, or affect any legal action for which the

Exchange is required to garnish wages. This is consistent with the SSN Instruction Use Case, Enclosure 2 sections 2.c.(4), (5), (6) and (7) of DoDI 1000.30.

The Exchange has taken steps to minimize the risk of unauthorized access to information located in our system of records. Paper and electronic 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 0703.07 and AAFES 0903.06. A notice of the proposed collection was published in the Federal Register on March 23, 2016, 81 FR 15511 and a Paperwork Reduction Act (PRA) package is pending.



DANIEL COOKSEY  
Deputy General Counsel  
Office of the General Counsel