



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

06 June 2016

MEMORANDUM FOR THE RECORD

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

SUBJECT: Justification for the Use of 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 "Accident and Incident" Files.

Files associated with accidents and/or incidences are located in a system of records consisting of data collected from individuals of the public. These individuals include Exchange employees, patrons, guests, and members who may be near or on Exchange property.

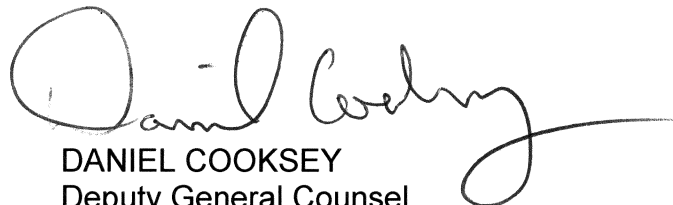
Data contained in this system is solicited by authority of Title 10, U.S.C. §3013, "Secretary of the Army"; Title 10 U.S.C. §8013, "Secretary of the Air Force"; Army Regulation 215-8/Air Force Instruction 34-211(I), "Army and Air Force Exchange Services Operations"; Executive Order 12196, "Occupational Safety and Health Programs for Federal Employees"; and Executive Order 9397 (SSN), as amended. This collected information is associated with accidents occurring at Exchange facilities, incidents or mishaps resulting in theft or reportable damage to Exchange property or facilities, and illnesses resulting from such accidents, incidents or mishaps. Disclosure of information is required so that steps can be taken to recoup damages, correct deficiencies, initiate appropriate disciplinary action, file insurance and claims, and to complete managerial and statistical reports.

Files in this system are obtained through the individuals surname or SSN. The SSN is used to assist in the location of all relevant data associated with the employee or individual. SSN may also be used in coordination with other government entities, force protection authorities, or law enforcement organizations. In issues resulting in theft or damages, the SSN may be used to coordinate claims with appropriate financial

institutions, litigation, and to obtain retributions. These uses are consistent with the SSN Instruction Use Case in Enclosure 2 sections 2.c.(2), (6), and (8) of DoD 1000.30.

The Exchange has taken the highest level of security steps to minimize the risk of unauthorized access to this system of records. Personnel are properly screened and cleared for access. To protect personal information from being inadvertently disclosed, this system of records is only accessible to Exchange associates who have undertaken annual Privacy Act training and have obtained security clearance through the National Agency Check. Information is accessible only to authorized personnel with an official "need to know" who are responsible for serving the record in performance of their official duties. Access to computer systems is maintained by role-based positions and further protected by passwords which are changed periodically. Access is denied to all others or to Exchanges associates who have not met the security training or have left employment with the Exchange. Policies are strictly enforced to protect the data.

The SSN, along with other personal data, is security collected, stored, and managed in accordance with the Exchange System of Record Notice (SORN) AAFES 0409.01. A 60-Day Federal Register Notice was published for public comment on May 20, 2016 (81 FR 31918).

A handwritten signature in black ink, appearing to read "Daniel Cooksey", with a long horizontal flourish extending to the right.

DANIEL COOKSEY
Deputy General Counsel
Office of the General Counsel