



DEFENSE LOGISTICS AGENCY
HEADQUARTERS
8725 JOHN J. KINGMAN ROAD
FORT BELVOIR, VIRGINIA 22060-6221

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES AND
TRANSPARENCY DIVISION

FEB 15 2018

SUBJECT: Justification for the Use of the Social Security Number (SSN) – Employee Activity
Guide for Labor Entry (EAGLE)

Department of Defense Instruction (DODI) 1000.30, “Reduction of Social Security Number (SSN) Use Within DoD,” (August 1, 2012), requires all DoD personnel to reduce or eliminate the use of SSNs wherever possible, except when the use of the SSN meets one or more of the acceptable use criteria DoDI 1000.30 establishes. To continue use of the SSN in a system or form, DLA must provide a memorandum justifying the continued use to the Defense Privacy, Civil Liberties, and Transparency Division.

This memorandum serves to justify the continuing need for the collection and use of the SSN for EAGLE. A Privacy Impact Assessment (PIA) has been completed on the EAGLE information system. EAGLE maintains SSNs under the following DLA Privacy Act systems of records notices (SORN):

S340.10 DLA Civilian Time and Attendance, Project and Workload Records, 77 FR 9632
February 17, 2012

Under the DODI 1000.30, Enclosure 2, section 2, paragraph c, there are 13 designated acceptable uses for SSNs. The designated acceptable uses for the EAGLE information system are as follows under the following two paragraphs:

“(4) Interactions with Financial Institutions. Financial institutions may require that individuals provide the SSN as part of the process to open accounts. It may therefore be required to provide the SSN for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.”

“(8) Computer Matching. Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information. These applications shall be rigorously scrutinized to determine the availability of some other means for conducting these transactions.”

EAGLE provides time and attendance recording for DLA personnel, and tracks time against workload, projects, and accounting data. EAGLE transmits time and attendance to the Defense Civilian Pay System (DCPS), which requires SSNs as the primary identifier for each

employee. The SSN must be collected to transfer time & attendance to DCPS for the purpose of DLA employee payroll processing.

The authorities for collection and maintenance of records include: 5 U.S.C. Chapter 61, Hours of Work; Chapter 53, Pay Rates and Systems; Chapter 57, Travel, Transportation, and Subsistence; and Chapter 63, Leave; 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 31 U.S.C., Chapter 35, Accounting and Collection; and E.O. 9397 (SSN), as amended.

Data may be provided under any of the DoD "Blanket Routine Uses" published at http://dpelo.defense.gov/privacy/SORNs/blanket_routine_uses.html.

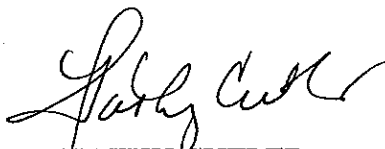
Rules for collecting, using, retaining, and safeguarding this information are contained in DLA Privacy Act System Notice S340.10, entitled "DLA Civilian Time and Attendance, Project and Workload Records" available at <http://www.dla.mil/HQ/InformationOperations/Privacy-Impact-Assessments/>.

Elimination of SSNs would necessitate changes by Defense Finance and Accounting Service to DCPS to support an alternative unique identifier for time and attendance system interface.

Security risks associated with maintaining data in an electronic environment have been mitigated through administrative, technical, and physical safeguards. The safeguards are commensurate with the risk and magnitude of harm that could result from the loss, misuse, or unauthorized access to or modification of the data. The risk associated with this collection is the same as those for other systems SSNs. The SSN is handled in accordance with FOUO procedures. This risk has been minimized through encryption and displaying SSN in plain text to DLA Human Resources payroll customer service representatives (CSRs) only. As DLA employees, payroll CSRs are made aware of the restrictions on secondary uses of the data records through initial and refresher Annual Information Assurance and Privacy training.

My signature below constitutes approval and justification for continued use and storage of the SSN in EAGLE.

Please direct all inquiries to Mr. Leonard Requa, DLA Information Operations, Strategic Workforce Capabilities Division (J6TD), at (703) 767-4975, DSN 427-4975, or email: Leonard.Requa@dla.mil.

A handwritten signature in black ink, appearing to read "Kathy Cutler". The signature is fluid and cursive, with the first name "Kathy" being more prominent than the last name "Cutler".

KATHY CUTLER
Director, DLA Information Operations
Chief Information Officer

The below signature serves as acknowledgement that this document has been reviewed by the DLA Chief Privacy Officer.

LEWIS OLEINICK, CIPP/US/G
DLA Chief FOIA and Privacy Officer