



DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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GC-C

23 JAN 2019

MEMORANDUM THRU:

Army Privacy Office (AAHS-RDF), 9301 Chapek Rd. Bldg. 1458 Fort Belvoir, VA 22060-5605

FOR Defense Privacy, Civil Liberties and, Transparency Division, 4800 Mark Center Drive,
Alexandria, VA 22350-3100

SUBJECT: Justification for the Use of the Social Security Number (SSN) – AAFES Application for Employment Files (system) and Local National Applications for Employment in OCONUS areas (hard copy files).

1. This memorandum is to satisfy the requirements of DoDI 1000.30, “Reduction of Social Security Number (SSN) Use Within the DoD,” requiring justification to collect and use the SSN.

2. AAFES System for Application for Employment Files in the CONUS area and manual Local National application files contains service and official employment history of individuals who apply for job opportunities with AAFES.

AAFES uses the SSN to interface with law enforcement and federal entities for background checks and security clearances. The SSN assist AAFES in confirming an individual’s employment eligibility, verifying previous federal employment, and authenticating that the applicant is in accordance with host country regulations and requirements.

3. The applicable acceptable uses for collection and use of the SSN are (2) Law Enforcement, National Security, and Credentialing, (3) Security Clearance Investigation or Verification, (5) Confirmation of Employment Eligibility, and (9) Foreign Travel. Information collected and maintained is obtainable by the individual’s name or SSN. SSN collected is used to assist in the location of the individual application and verification that the application belongs to such individual.

4. The System of Records Notice (SORNs) associated with the AAFES Employment Applications is AAFES 0403.01, “Application for Employment Files”.

5. Information contained in this system is solicited by authority of Title 10 U.S.C. 7013, Secretary of the Army; Title 10 U.S.C. 9013, Secretary of the Air Force; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

6. The application files are not made publically available. Only personnel with a need to know have access to the files. A thorough effort has been made to evaluate the risk associated with the use of the SSN. Paper and electronic copies of the applications are disposed of as

GC-C

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required by the records disposition schedule. Personnel monitoring, reviewing, or using the applications are required to follow the established safeguards to protect individual's privacy.

In addition, administrative, technical and physical safeguards are in place limiting access to personnel with an official need to know. AAFES conducts periodic security audits and regular monitoring to prevent unauthorized access. Users of the electronic systems have a two point login criteria including their official AAFES user name and password. Intrusion detection systems, encryption and firewall protection furtherly protects unauthorized access. Physical safeguards include security guards, identification badges, key cards, safes, and cipher locks. Hard copy files are kept in secured areas under lock and key accessible only to authorized individuals.

7. My POC is Mrs. Teresa Schreurs, Paralegal, FOIA/Privacy Manager, schreurste@aafes.com, 214-312-6103.



On behalf of:

EDWIN LLEWELLYN

Deputy General Counsel

Office of the General Counsel