



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

APRIL 23, 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) – Accounts
Receivable 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. 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 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.
3. The applicable acceptable uses for collection and use of the SSN are (4) Interactions With Financial Institutions and (12) Operational Necessity. 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 DoDI1000.30.
4. The System of Records Notice (SORNs) associated with the Exchange Accounts Receivable Files is AAFES 0702.34, "Accounts Receivable Files". Exchange systems are stand-alone technologies and not part of Department of Defense Business Information Systems. Therefore, there is not DIPTTR number to provide.
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; Federal Claims Collection Act of 1966 (Pub.L. 89-508, as amended) and Debt Collection Act of 1982 (Pub.L. 97-365, as amended), as amended by the Debt Collection Improvement Act of 1996 (Pub.L. 104-134, section 31001) as codified in 31 U.S.C. §3711, Collection and Compromise; 31 CFR 285.11, Administrative Wage Garnishment; DoD Instruction 1330.21, Armed Services Exchange Regulations; DoD 7000.14-R, Department of Defense Financial Management Regulation Volume 13:, "Nonappropriated Funds Policy" and Volume 16: "Department of Defense Debt

Management”; Army Regulation 215-8/Air Force Instruction 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

6. 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.

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