



DEPARTMENTS OF THE ARMY AND AIR FORCE

ARMY & AIR FORCE EXCHANGE SERVICE

Office of the General Counsel

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GC-C

August 19, 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 Web-Based Insurance Enrollment through Willis Towers Watson; Exchange Form 1450-011, *Annuity Application*; Exchange Form 1450-018, *Application for Payment of Survivor Annuity, Death in Service*; and Exchange Form 1700-012, *Beneficiary Designation*.

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 Employee Pay Records consists of information collected from persons affiliated with AAFES by assignment, employment, contractual relationship, or as an employee dependent or beneficiary. Records contain the basis for computing civilian pay entitlements. Information is maintained to record history of pay transactions, leave accrued and taken, bonds due and issued, taxes paid, and payments made in compliance with court orders (i.e. Qualifying Domestic Relations Orders).
3. The applicable acceptable uses for collection and use of the SSN are (4) Interactions With Financial Institutions, (5) Confirmation of Employment Eligibility, (6) Administration of Federal Workers' Compensation, and (7) Federal Taxpayer Identification Number. Information collected and maintained is obtainable by the individual's full name or SSN.

AAFES uses the SSN to aid in the location of all relevant data pertaining to the individual, which may affect his/her pay or benefits, coordination with the individual's financial institution, state and federal taxes, or any legal action for which AAFES is required to garnish wages. The SSN is also required when addressing requests from other Federal entities regarding an individual's suitability, Workers' Compensation pay, or court orders regarding Child Support.

4. The System of Records Notice (SORNs) associated with the AAFES Employee Pay System AAFES 0703.07, *AAFES Employee Pay System Records*. AAFES systems are stand-alone .com technology and not part of Department of Defense Business Information Systems. Therefore, there is no DIPTR number to provide.

5. The prescribing directive for the AAFES collection on the eBenefits Web-based system and Forms 1450-011, 1450-018, and 1700-012 is DoDI 1400.25, Volume 1408, *DoD Civilian*

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Personnel Management System: Insurance and Annuities for Nonappropriated Fund (NAF) Employees). Appropriate authorities supporting collection of the SSN are: Title 10 U.S.C. 7013, Secretary of the Army; Title 10 U.S.C. 9013, Secretary of the Air Force; 42 U.S.C. 659, *Consent by United States to Income Withholding, Garnishment, and Similar Proceedings for Enforcement of Child Support and Alimony Obligations*; 31 CRR 285.11, *Administrative Wage Garnishment*; DoD Directive 7000.14-R, *DoD Financial Management Regulation*; Army Regulation 215-8/AFI 34-211(I), *Army and Air Force Exchange Service Operations*; and E.O. 9397 (SSN), as amended.

6. AAFES employment pay files are not made publically available. Only personnel with a need to know have access to these 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 required by the records disposition schedule. Personnel monitoring, reviewing, or using the applications are required to follow the established safeguards to protect an 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 further 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:

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