



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

29 JUL 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 Asset Protection Information System (APIS).

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 Asset Protection Information System (APIS) is a system of records consisting of data collected from AAFES employees and individuals of the public including patrons, guests, and individuals who may be near or on AAFES property.

Collected information is associated with accidents and incidents occurring at AAFES facilities. This includes injuries and illnesses resulting from accidents, shoplifting and employee thefts, and issues involving damage to government property. In cases of injury or illness, the SSN may be used for verification of the individual in assisting in medical and Workers' Compensation claims. The SSN may be used in coordination with other government entities such as the local Military Police or law enforcement organizations. In issues resulting in theft or damage, the SSN may be used to coordinate claims with appropriate financial institutions, litigation, and to obtain reimbursement. For credibility of job applicants, approved AAFES hiring managers may also use data within this system.

Approved AAFES management personnel use the information within this system to recoup damages, correct deficiencies, initiate appropriate disciplinary action, file insurance and claims, and to complete managerial and statistical reports.

3. The applicable acceptable use for collection and use of the SSN is (2) Law Enforcement, National Security, and Credentialing, (4) Interactions with Financial Institutions, (5) Confirmation of Employment Eligibility, (6) Administration of Federal Workers' Compensation and (8) Computer Matching.
4. The forms, interfacing IT system, and the System of Records Notices (SORNs) associated with the IT system are as follows: Exchange Form 3900-017 Statement, Military Police Statements; AAFES Personnel Management Information System (PMIS); AAFES 0409.01, AAFES Accident/Incident Reports.

GC-C

SUBJECT: Justification for the Use of the Social Security Number (SSN) – AAFES Asset Protection Information System (APIS).

5. Authorities supporting collection of the SSN are: 10 U.S.C. 7013, *Secretary of the Army*; 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*; Executive Order (E.O) 12196, *Occupational Safety and Health Programs for Federal Employees*; E.O. 13478, dated November 18, 2008, which amended EO 9397, dated November 22, 1943.

6. The system is not made publically available. Only personnel with a need to know who have been screened and cleared have access to the files. Access is further restricted by passwords, which are changed periodically. 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.

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