



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

August 23, 2021

MEMORANDUM THRU:

Army Privacy Office (AAHS-RDF), 7701 Telegraph Road, Casey Building, Alexandria, VA 22315-3802

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) – Exchange Non-Appropriated Personnel Systems

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 Nonappropriated Personnel Systems contain information collected regarding persons affiliated with the Exchange by assignment, employment or possible employment, contractual relationship, or as an employee dependent or beneficiary. Data may be collected directly from the individual or from outside sources such as past employers, medical providers, law enforcement entities, or government agencies.

This system contains the Official Personnel File (OPF) encompassing the service and employment history of individuals employed by the Exchange. Merged data from previous employment with the Civil Service under the provisions of the Portability of Benefits for Nonappropriated Fund Employees Act, PI 101-508, the DoD Interchange Agreement, or other NAFIs may be contained in the personnel systems along with applications of hired individuals.

The personnel system manages applications for non-hired individuals and paper applications for Local National positions. Data maintained assists in determining an individual’s employment eligibility, verify previous Federal employment, and coordinate foreign travel to include, making sure the individual is authenticated in accordance with all host country requirements. Interface with law enforcement and Federal entities is required for background checks and security clearances.

Information collected for official travel allows proper processing of all Permanent Change of Station (PCS) for the Continental United States (CONUS) and Outside the Continental United States (OCONUS) and Temporary Duty (TDY) requests for employees and their dependents/family members. The data collected assists in determining eligibility of the employee and/or dependents to travel, obtain passports and visas and travel expense reimbursement.

SUBJECT: Justification for the Use of the Social Security Number (SSN) – Exchange Non-Appropriated Personnel Systems

Records contain the bases for administering and processing benefits, retirements, approved tuition reimbursement, annuity and survivor payouts, computing civilian pay entitlement, bonds due and issued, taxes paid and owed, payments made in compliance with Court Orders such as for Qualifying Domestic Relations Orders or to enforcement of Child Support or alimony obligations and administer appropriate Federal Workers' Compensation programs.

The SSN is a requirement to interface with law enforcement and Federal entities for background checks and security clearances and to administer pay with proper financial institutions and the Treasury Department for tax collection purposes.

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, (4) Interactions with Financial Institutions, (5) Confirmation of Employment Eligibility, (6) Administration of Federal Workers' Compensation, (7) Federal Taxpayer Identification Number, (8) Computer Matching, (9) Foreign Travel, and (12) Operational Necessity. Information collected and maintained in this system is obtainable by the individual's name or SSN. SSN collected is used to assist in the location of all relevant data associated with the individual or employee which can affect the individual's security clearance, pay, employment, promotion, or benefits to said employee or his/her dependents, family members, survivors, and beneficiaries.

4. The System of Records Notices (SORN) associated with the systems and collective instruments listed above is 0401.04 "Exchange Non-appropriated Personnel Systems." This SORN has been retitled and revamped for consolidation of all Exchange personnel records and is in the process of submission for approval. The System of Records currently published include: AAFES 0401.04 "Official Personnel Folders", AAEFS 0403.01 "Application for Employment Files", AAFES 0403.11 "Personnel Departure Clearance Records", AAEFS 0404.01 "Incentive Awards Case Files", AAFES 0405.11 "Individual Health Records", AAFES 0408.14 "Tuition Assistance Case Files", AAFES 0410.01 "Employee Travel Files", AAFES 0703.07 "Employee Pay System", AAFES 0903.06 "Personnel Management Information System", AAFES 1203.03 "Appointment of Contracting Officers", and finally AAFES 1504.03 "Personal Property Movement and Storage Files". These systems, although working separately, daily share data for regulated administrative actions.

The Exchange has made every effort for the removal or the truncate of the SSN whenever possible. Our operations Risk Management Framework (RMF) is based on a .com environment. Exchange systems are not part of the Defense Business Systems nor the e-Mass. Thereby, our systems are not authorized to use DITPR. The Exchange utilizes a Governance, Risk and Compliance (GRC) for internal RMF processing and system authorizations.

SUBJECT: Justification for the Use of the Social Security Number (SSN) – Exchange Non-Appropriated Personnel Systems

Collective instruments stored in the Exchange Personnel System which have acceptable collection of the SSN, as identified in item number 3 of this memoranda, include, but not all inclusive, the following:

- a) Exchange CONUS electronic applications for employment <https://publicaffairs-sme.com/applymyexchange/>
- b) Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) - Italy Consolidated, Vicenza
- c) Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) – Turkey
- d) Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) – UK – RAF Feltwell
- e) Exchange Form 1200-718 - Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) – Germany
- f) Exchange Form 1100-016 *Army and Air Force Exchange Service Identification & Privilege Card Application*
- g) Exchange Form 1100-028 *Pre-Appointment Certification Statement for Selective Services Registration*
- h) Exchange Form 1200-026 *Driver's Supplemental Information*
- i) Exchange form 1200-100 *Personnel Request* Exchange Form 1450-011 *Annuity Application*
- j) Exchange Form 1450-018 *Application for Payment of Survivor Annuity*
- k) Exchange Form 1450-026 *Survivor Annuity Upon Death*
- l) Exchange Form 1500-003 *Renewal Transportation*
- m) Exchange Form 1500-004 *Transportation Agreement*
- n) Exchange Form 1500-008 *Exchange Transfer Agreement*
- o) Exchange Form 1500-010 *Waiver or Right to Ship Vehicle and Request for Reimbursement*
- p) Exchange Form 1500-013 *Request and Authorization for TDY Travel*
- q) Exchange Form 1500-014 *Authorization for Permanent Change of Station (PCS) Travel*
- r) Exchange Form 1500-032 *Request and Authorization for Change of Travel*
- s) Exchange Form 1700-109 *Employee Consent Authorization to Release of Medical/Dental Records*
- t) Exchange Form 1850-001 *Degree Application*
- u) Exchange Form 1850-005 *Job Related Course Request*

SUBJECT: Justification for the Use of the Social Security Number (SSN) – Exchange Non-Appropriated Personnel Systems

- v) Exchange Form 1850-015 *Tuition Reimbursement*
- w) Exchange Form 7450-012 *Workers' Compensation Direct Deposit Authorization*

5. Information contained in this system is solicited by authority of 10 U.S.C. 7013, Secretary of the Army; 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 CFR 285.11, Administrative Wage Garnishment; DoD Directive 7000.14-R, DoD Financial Management Regulation; DoD Instruction 1400.25, Volume 1408, DoD Civilian Personnel Management System: Insurance and Annuities for Nonappropriated Fund (NAF) Employees; Army Regulation 215-8/AFI 34-211(I), Army and Air Force Exchange Service Operations; and E.O. 9397 (SSN), as amended.

6. Administrative, technical, and physical safeguards are in place limiting access to personnel with an official need to know. The Exchange conducts periodic security audits and regular monitoring to prevent unauthorized access. Users of the system gain access with a two-point authorization login, which includes official Exchange username 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, Senior Paralegal, FOIA/Privacy Manager, schreurste@aafes.com, 214-312-6103 or 214-202-5541.



EDWIN LLEWELLYN III
Deputy General Counsel
Chief Privacy Officer
Office of the General Counsel