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04 APR 2025

MEMORANDUM THRU:

Department of the Army, Records Management Directorate, Army Privacy and Civil Liberties Office, 9301 Chapek Rd. Bldg. 1458, Fort Belvoir, VA 22060-5605

FOR Department of Defense, Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties and Transparency Division, Regulatory Directorate, 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.a. The Exchange Nonappropriated Personnel Systems contain information AAFES collects regarding persons affiliated with AAFES by assignment, employment or potential employment, contractual relationship, or as an employee dependent or beneficiary. AAFES collects data directly from the individual or from outside sources such as past employers, medical providers, law enforcement entities, or government agencies.

2.b. This system contains the Official Personnel File (OPF) encompassing the service and employment history of individuals employed by AAFES. Merged data from previous employment with the Civil Service under the provisions of the Portability of Benefits for Nonappropriated Fund Employees Act, PL 101-508, the DoD Interchange Agreement, or other NAFI’s personnel systems along with the individual applications for employment.

2.c. 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 including authentication in accordance with all host country requirements. Background checks and security clearances require interface with law enforcement and Federal entities.

2.d. 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

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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.

2.e. 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.

2.f. 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 assists 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.a. The System of Records Notice (SORN) associated with the systems and collective instruments listed above is DHRA-23 DoD "Defense Civilian Human Resource Management System." AAFES systems work separately but share data for regulated Human Resource administrative actions.

4.b. AAFES has made every effort for the removal or truncation of the SSN whenever possible. Operations Risk Management Framework (RMF) is based on a .com environment. AAFES systems are not part of the Defense Business Systems or on e-Mass, and therefore not authorized to use DITPR. AAFES utilizes a Governance, Risk and Compliance (GRC) for internal RMF processing and system authorizations.

4.c. 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 is not limited to the following:

- 1) Exchange CONUS electronic applications for employment
<https://www.applymyexchange.com/>.
- 2) Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) - Italy Consolidated, Vicenza
- 3) Exchange Local National Applications for Employment in Outside of the

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Contiguous United States (OCONUS) – Turkey

- 4) Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) – UK – RAF Feltwell
- 5) Exchange Form 1200-718 - Exchange Local National Applications for Employment in Outside of the Contiguous United States (OCONUS) – Germany
- 6) Exchange Form 1100-016 *Army and Air Force Exchange Service Identification & Privilege Card Application*
- 7) Exchange Form 1100-028 *Pre-Appointment Certification Statement for Selective Services Registration*
- 8) Exchange Form 1200-100 *Personnel Request*
- 9) Exchange Form 1450-011 *Annuity Application*
- 10) Exchange Form 1450-018 *Application for Payment of Survivor Annuity*
- 11) Exchange Form 1450-026 *Survivor Annuity Upon Death*
- 12) Exchange Form 1500-003 *Renewal Transportation*
- 13) Exchange Form 1500-004 *Transportation Agreement*
- 14) Exchange Form 1500-008 *Exchange Transfer Agreement*
- 15) Exchange Form 1500-010 *Waiver or Right to Ship Vehicle and Request for Reimbursement*
- 16) Exchange Form 1500-013 *Request and Authorization for TDY Travel*
- 17) Exchange Form 1500-014 *Authorization for Permanent Change of Station (PCS) Travel*
- 18) Exchange Form 1500-032 *Request and Authorization for Change of Travel*
- 19) Exchange Form 1700-109 *Employee Consent Authorization to Release of Medical/Dental Records*
- 20) Exchange Form 1850-001 *Degree Application*
- 21) Exchange Form 1850-005 *Job Related Course Request*
- 22) Exchange Form 1850-015 *Tuition Reimbursement*
- 23) 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.

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6. 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 system gain access with a two-point authorization login, which includes official AAFES username 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.

7. My POC is Mrs. Teresa Schreurs, Senior Paralegal, Government Information Manager of Privacy, schreuste@aafes.com, 214-312-6103 or 214-202-5541.

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