



**DEPARTMENTS OF THE ARMY AND AIR FORCE
ARMY & AIR FORCE EXCHANGE SERVICE
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GC-C

February 1, 2024

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 Form 3900-002 “Trusted Associate Sponsorship Systems (TASS), Exchange Form 3900-006 “Background Check for Vendors/Contractors”, Exchange Form 3900-013 “e-QIP Request Form; AAFES Resource Onboarding Application (ROBA) Web-based system; and AAFES Electronic system of Personnel Security Clearance Case 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. a. AAFES System for Personnel Security Clearance Case Files consists of information collected from persons affiliated with AAFES by assignment, employment, contractual relationship, or as the result of an inter-service support agreement. Records contain security clearance determinations completed, in process, or pending.
- 2.b. AAFES uses the SSN to aid the Exchange Force Protection in determining and providing security clearance for individuals stationed at AAFES facilities. This includes providing security clearance, denial of clearance, or removal of clearance into classified locations or sensitive positions.
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, (8) Computer Matching, and (9) Foreign Travel. Information collected and maintained is obtainable by the individual’s name or SSN. SSN collected assists in the location of all relevant data within AAFES and outside sources associated with reviewing the individual’s criteria, background, and trustworthiness for security clearance and providing such clearance.
4. The System of Records Notice (SORNs) associated with the AAFES Personnel Security Clearance is AAFES 1703.03, “Personnel Security Clearance Case Files.” AAFES systems are stand-alone .com technology and not part of Department of Defense Business Information Systems. Therefore, there is not DIPTR number to provide.

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5. The prescribing directives for the AAFES Forms 3900-002, 3900-006 and 3900-013 and the collection of information on the AAFES Resource Onboarding Application (ROBA) Web-based system is DoDI 5200.01, Rev. October 1, 2020, DoD Information Security Program and Protection of Sensitive Compartmental Information (SCI) and DoDI 5200.02, Rev. September 24, 2020, DoD Personnel Security Program (PSP). 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; Executive Order 10450, Security Requirements for Government Employment; DoDMAN 5200.02_DAFMAN 16-1405, as amended, Department of the Air Force Personnel Security Program; Department of the Air Force Instruction (DAFI) 16-1404, Department of the Air Force Information Security Program; Army Regulation 215-8/DAFI 34-211(I), Army and Air Force Exchange Service Operations; Army Regulation 380.67, Personnel Security Program; and E.O. 9397 (SSN), as amended.

6. a. The public does not have access to security clearance. Only personnel with a need to know have access. AAFES conducted a thorough effort to evaluate the risk associated with the use of the SSN. AAFES destroys paper and electronic copies of applications in accordance as required by the records disposition schedule. The implementation and improvements of ROBA has resulted in a decreased of paper applications. AAFES continually monitor, review, and track usage of the applications through established safeguards to protect individual’s privacy.

6.b. 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. Two-point login criteria exists for assessing system, using official AAFES 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. Secured areas maintain hard copy files under lock and key accessible only to authorized individuals.

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

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