



**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) – Accounts Receivable Files; Exchange Credit Program.

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 Accounts Receivable Files is a system of records consisting of information collected from potential, past, or authorized Exchange patrons. Disclosure of information is necessary so AAFES can take steps to process, monitor, and post audit accounts receivable, to administer the Federal Claims Collection Act, to answer inquiries pertaining thereto, and report to the consumer reporting agencies as an incentive for debtors to repay delinquent Federal Government debts. The SSN confirms the identity of the individual related to such debt.
3. The applicable acceptable uses for collection and use of the SSN are (4) Interactions With Financial Institutions and (12) Operational Necessity. SSN collected is necessary to open accounts, locate accounts, and to correspond with financial institutions and places of employment for the need of garnishing wages, salaries, or to collect credit information. Tax related issues require the use of the SSN. These uses are consistent with the SSN Instruction Use Case in Enclosure 2 section 2.c.(4), and (7) of DoDI 1000.30.
4. The Systems of Records (SORNs) associated with the Exchange Accounts Receivable Files is DoD-0018, "DoD Patron Authorization, Retail, and Service Activities". AAFES systems are stand-alone technologies and not part of the Department of Defense Business Information Systems. There is no DIPTR number to provide.
5. 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; Federal Claims Collection Act of 1966 (Pub.L. 89-508, as amended) and Debt Collection Act of 1982 (Pub.L 97-365, as amended), as

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amended by the Debt Collection Improvement Act of 1996 (Pub.L 104-134, section 31001) as codified in 31 U.S.C. §3711, Collection and Compromise Activities; 31 CFR 285.11, Administrative Wage Garnishment; [10 U.S.C. 2481](#), Defense Commissary and Exchange Systems: Existence and Purpose; [10 U.S.C. 1146](#), Commissary and Exchange Benefits; [10 U.S.C. 2488](#), Combined Exchange and Commissary Stores; [14 U.S.C. 152](#), Nonappropriated Fund Instrumentalities; DoD Instruction 1330.21, Armed Services Exchange Regulations; DoDI 1330.09, Armed Services Exchange Policy; DoDI 1330.21, Armed Services Exchange Regulations; DoD 7000.14-R, Department of Defense Management Regulation Volume 13, “Nonappropriated Funds Policy” and Volume 16 “Department of Defense Debt Management;” Army Regulation 215-8/Department of the Air Force Instruction 34-110(I), Army and Air Force Service Operations; and E.O. 9397 (SSN), as amended.

6.a. AAFES has taken steps to minimize the risk of unauthorized access to information located in this system of records. Controlled areas maintain paper and electronic records accessible only to authorized personnel in controlled facilities. Physical entry is furtherly restricted by use of locks, guards, and accessible only to authorized personnel. Limitations of access to records are set for person(s) with an official “need to know” screened for access, and responsible for servicing the records in performance of their official duties. Role-based security and frequent changes of user passwords, confines access and protects data maintained in computerized systems.

6.b. Disclosures of information located within this system is pursuant to those permitted under Title 5 U.S.C. §552a(b) of the Privacy Act of 1974, as amended. This may include disclosures to the U.S. Department of Justice/U.S. Attorneys for legal action, the Internal Revenue Service to obtain locator status for delinquent accounts, to private collection agencies for collection actions, to the Department of the Treasury, Financial Management Service for the purpose of collecting debts, to any employer for garnishment purposes, and to military banking facilities.

7. My POC is Ms. Teresa Schreurs, Senior Paralegal, Government Information Manager of Privacy, schreurst@aa fes.com, 214-202-5541.

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