



OVERSIGHT AND
COMPLIANCE

OFFICE OF THE CHIEF MANAGEMENT OFFICER
9010 DEFENSE PENTAGON
WASHINGTON, DC 20301-9010

October 3, 2019

MEMORANDUM FOR THE DEFENSE FINANCE AND ACCOUNTING SERVICE

SUBJECT: Justification for the Use of Social Security Numbers in the Defense Cash
Accountability System (DCAS) - Accepted

Thank you for completing a review of Social Security Number (SSN) use within this system. The Defense Privacy, Civil Liberties and Transparency Division (DPCLTD) has reviewed this request and has accepted your justification to use the SSN for the purpose of (7) Federal Taxpayer Identification Number, to perform cross disbursing functions in reconciling financial transactions among Department of Defense (DoD) systems using the SSN / Taxpayer Identification Number. Also, Acceptable Use (8) Computer Matching, was accepted. The DCAS performs reconciliation of funds balance with the Department of Treasury for DoD systems.

Acceptable Use (11) Legacy System Interface, is temporarily approved for interactions with DoD systems. DFAS must begin taking steps to transition to the EDIPI / DoD ID number. Please provide a transition plan for this system, including a Plan of Action and Milestones (POAM) within 60 days of the date of this letter. This system must be reviewed on a continuous basis and a new justification must be provided if any change to the system is submitted.

Acceptable Use (4) Interactions With Financial Institutions, was not accepted. The Department of the Treasury is a federal agency and not a private financial institution.

While this system has been identified as requiring the collection, maintenance and use of the SSN, you must ensure this data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards. Also, please maintain a copy of your justification and this memo in your records.

SSN Justifications must be renewed three (3) years after the date of this memorandum if the associated system has not been updated.

If you have any questions, please contact Ms. Cheryl Jenkins at (703) 571-0026 or e-mail, cheryl.jenkins8.civ@mail.mil.

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Cindy L. Allard
Chief, Defense Privacy, Civil Liberties,
and Transparency Division



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DFAS-ZT

April 24, 2018

**MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY
DIVISION**

**SUBJECT: Justification for the Use of the Social Security Number (SSN) and/or Tax
Identification Number (TIN) – Defense Cash Accountability System (DCAS)**

The Defense Finance and Accounting Service (DFAS) employs DCAS, to support Department of Defense (DoD) cross disbursing functions in reconciling financial transactions among the DoD reporting entities, and the reconciliation functions of Funds Balance with Treasury. DCAS supports the Automated Disbursing System and the Defense Travel System which require that Personally Identifiable Information (PII) pass through DCAS. As a result, DCAS processes PII consisting of SSNs and TINs in order for partner systems to be able to perform their missions. The last signed Privacy Impact Assessment performed as part of the accreditation process was completed and signed on April 03, 2018.

The justification for the use of the SSN and/or TIN is DoD Instruction 1000.30, Enclosure 2, Paragraphs 2.c. (4) "Interactions with Financial Institutions" and Enclosure 2, Paragraph 2.c. (7) "Federal Taxpayer Identification Number." Financial institutions may require individuals provide their SSN to open accounts. The SSN may also be required for systems, processes, or forms in transactions with financial institutions.

The authority for DCAS to collect, use, maintain and/or disseminate PII is found in the following: 5 United States Code 301, Departmental Regulations; Public Law 104-134, Debt Collection Improvement Act of 1996; DoD Financial Management Regulation 7000.14-R, Volumes 7B, 7C, 8, Military Pay Policy and Procedures Retired Pay, Military Pay Policy and Procedures Active Duty and Reserve Pay, Civilian Pay Policy and Procedures; and Executive Order 9397 (SSN), as amended. The DoD Information Technology Portfolio Repository identifier for this system is 17248. A System of Records Notice (SORN) is not required for partner systems support since these systems already have SORNs.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The SSN and/or TIN must continue to be collected and stored in order for partner systems to be able to perform their missions. DCAS has established user roles and access procedures that safeguard the SSN and TIN.

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Director, Information Technology

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