



OVERSIGHT AND
COMPLIANCE

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

December 17, 2019

MEMORANDUM FOR THE DEFENSE FINANCE AND ACCOUNTING SERVICE,
INFORMATION TECHNOLOGY

SUBJECT: Justification for the Use of Social Security Numbers in Centralized Disbursing System (CDS), DITPR ID # 31 - 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 (11) Legacy System Interface, to interface with legacy Department of Defense systems for the purpose of collecting information for disbursing payments. 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. A SSN is not necessary to provide payments to individuals or organizations; a bank account and routing number will suffice.

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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cc:
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DEFENSE FINANCE AND ACCOUNTING SERVICE

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MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARANCY DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) and/or Tax Identification Number (TIN) – Centralized Disbursing System (CDS)

Defense Finance and Accounting Service (DFAS) utilizes CDS to process disbursements, collections, and reporting payments for a variety of entitlement systems through checks and Electronic Fund Transfer payments. The SSN is required in certain instances for payment, collection, and tax reporting functions to ensure proper disbursement of funds. Specifically, the SSN is required when making travel payments to the bank, using a batch payment process through CDS.

CDS supports the DFAS centralized environment for disbursing and collects information from the Air Force, DFAS Field Sites, Navy Military Sealift Command and National Geospatial Agency. In addition to these interfaces, internal DFAS system-to-system interfaces exist. CDS holds a System of Record Notice (SORN) as it uses Personally Identifiable Information (PII) to retrieve information. The CDS SORN was sent to the Department of Defense (DOD) Component Privacy Office to be registered on March 6, 2019; SORN reference number T7320b.

PII banking, SSN, and address information is necessary to properly disburse funds to payees, otherwise, CDS would not be able to disburse funds. The justification(s) for the continued use of SSN in accordance with DoD Instruction 1000.30, Enclosure 2 Paragraph 2 “Acceptable Uses,” is Use Case 4 “Interactions With Financial Institutions” and 11, “Legacy System Interface”.

According to Use Case 4: “Financial institutions may require that individuals provide the SSN as part of the process to open accounts. It may, therefore, be required to provide the SSN for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.” CDS meets this criteria, as vendors and the United States Department of Treasury require SSNs to ensure proper disbursement to payees.

According to Use Case 11: “SSN may not be able to transition to another identifier in a timely manner due to an interface with a legacy system still using the SSN, or due to the excessive cost associated with the change.” CDS acquires SSNs through the use of existing legacy system interfaces and manual entry when not available to perform disbursing payments.

No current plan to eliminate the use of SSNs within CDS is in place. Mitigation efforts are underway to systemically limit visibility of the SSN. Additionally, a recent business case analysis determined eventual subsuming of CDS functionality into another system. Otherwise, until further notice, SSN use within CDS is critical for continued disbursement operations.

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