July 15, 2014

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE PRIVACY
OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in DITPR SystemS –
Accepted

Thank you for completing your review of Social Security Number (SSN) use within your
systems. After review, the Defense Privacy and Civil Liberties Office has accepted your
justifications for continued use of the SSN (see attached). Further review of these systems will
not be required under DoD's current SSN Reduction plan. While these systems have been
identified as still requiring collection, maintenance, and use of the SSN, you must continue to
ensure that this data is afforded the highest protections practicable through use of appropriate
administrative, technical and physical safeguards. Please maintain a copy of your justification
and this memo in your records.

If you have any questions, please contact Ms. Viki Halabuk at (703) 571-0070 or e-mail
viki.l.halabuk.civ@mail.mil.

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Samuel P. Jenkins
Director for Privacy

Attachment:
As stated.

	SSN Use Justification Memo for Defense Finance and Accounting Service July 15, 2014		
DITPR Number	**System Name**	**Acronym**	**Accepted Justification**
30	Departmental Cash Management System	DCMS	(8) Computer Matching and (11) Legacy System Interface
93	Defense Civilian Pay System	DCPS	(4) Interactions With Financial Institutions, (7) Federal Taxpayer Identification Number, and (8) Computer Matching
98	Defense Retireee and Annuitant Pay System	DRAS	(1) Geneva Conventions Serial Number and (7) Federal Taxpayer Identification Number
853	myInvoice		(7) Federal Taxpayer Identification Number and (8) Computer Matching

DFAS-ZT

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of Social Security Number (SSN) – Defense Civilian Pay System (DCPS), SORN T7335, Last PIA dated 11 October 2012.

The program mission of DCPS is to process payroll for Federal appropriated fund civilian employees in accordance with existing regulatory, statutory and financial information requirements relating to civilian pay entitlement and applicable policies and procedures. DCPS provides standard interface support to the various accounting, financial and personnel systems and supports approximately 1.2 million civilian employees worldwide.

The justification for use of SSN for DCPS is based on compliancy with DoDI 1000.30 and is threefold; 1) DoDI 1000.30, Enclosure 2, Paragraph 2.c (4) "Interactions with Financial Institutions", 2) DoDI 1000.30, Enclosure 2, Paragraph 2.c (7) "Federal Tax Payer Identification Number", and 3) DoDI 1000.30, Enclosure 2, Paragraph 2.c (8) Computer Matching, necessary for the reports as annotated on the attached SSN Report Inventory Justified Rules listing.

DCPS is not able to transition to another identifier due to the interfaces with many legacy systems still using the SSN. The reprogramming necessary to change the key data field is cost and time prohibitive.

To ensure adequate protection and unnecessary use of Personally Identifiable Information (PII), DFAS removes or masks SSN's on identified DCPS reports. When masking is used the employee's SSN is hidden and displayed as XXX-XX-XXXX. The Leave and Earning Statement (LES) masks the first five numbers of the SSN and displays the last four, for example XXX-XX-1234.

My point of contact is Tim Snyder at 317-212-8978.

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Jerry S. Hinton
Director, Information and Technology

Attachments: As stated