



DEPARTMENT OF DEFENSE
DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE
241 18TH STREET SOUTH, SUITE 101
ARLINGTON, VA 22202-4512

July 15, 2014

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE PRIVACY
OFFICE

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

Thank you for completing your review of Social Security Number (SSN) use within the Defense Workload Operations Web System. After review, the Defense Privacy and Civil Liberties Office has accepted your justification for continued use of the SSN for the purpose of (1) Geneva Conventions Serial Number. Further review of this system will not be required under DoD's current SSN Reduction plan. While this system has 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



DEFENSE FINANCE AND ACCOUNTING SERVICE

ARLINGTON

4800 MARK CENTER DR.
ALEXANDRIA, VA 22350-3000

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of Social Security Number (SSN) – **Defense Workload Operations Web System (DWOWS) SORN ID T7340c**

DWOWS does not have an assigned System Identifier (SID) or DoD Information Technology Portfolio Repository (DITPR). DWOWS is a subsystem of the Defense Joint Military Pay System-Active Component (DJMS-AC), the parent system. The parent system maintains a SID and DITPR number.

DWOWS is an internet web-based system used by the Defense Finance Accounting Service to track communications and inquiries (e-mail, faxes, letters, memorandum and phone calls) received and processed for Marine Corps and Navy Active Duty and Reserve members, to include questions involving the Savings Deposit Program and by management for benchmark reporting in order to track the turn-around time on financial inquiries.

The SSN is the method of identification used by the military. The Military Pay System (DJMS) uses the SSN to process and research pay record information. When corrective action needs to be taken on a military pay member account, a case is created and steps to resolve the case are tracked in DWOWS. The case uses the SSN as the primary identifier for the military member. The intended use of the SSN is for mission-related and administrative use.

Justification for the use of the SSN falls under DoDI 1000.30, Enclosure 2, Section 2, Acceptable Uses, (1) Geneva Conventions Serial Number. As of the late 1960s, the SSN has served as the Geneva Conventions serial number for the Military Services. Many of the systems, processes, and forms used by the Department of Defense categorize individuals by their SSNs. We are aware that the services are expected to move away from SSN usage, and we will look to assist the services and Defense Joint Military Pay System (DJMS) toward that end.

DWOWS has taken measures to mitigate risk associated with using the SSN. Access to the facilities is restricted to authorized DoD employees and authorized contractors.

- Managed firewalls prevent access by other systems or network traffic not specifically identified in the firewall rule base.
- Access controls limit access to the application and/or specific functional areas of the application. Individuals are granted access to the system only after they have been verified to have a defined need to access the information and have gone through background and employment investigations, and are required to take yearly Information Assurance training and Spirit Training. Users are given only those

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system privileges based on their need to know, and which are necessary for their job requirements.

A security Certification and Accreditation (C&A) for the system was completed in accordance with the requirements of the Federal Information Security Act of 2002 (FISMA). The C&A process is an audit of policies, procedures, controls, and contingency planning, required to be completed for all federal government IT systems every three years, and is also reviewed at least annually to maintain currency. The C&A process include review and renewal of a Privacy Act Assessment (PIA). The last PIA review was conducted in February, 2013. DFAS adheres to physical protections of Personally Identifiable Information (PII) as described in accordance with DFAS 5200.1-R. IA Policy (DFAS 8400.1-R) prescribes protection requirements for sensitive data, to include PII, for all DFAS systems. Management responsibilities for protecting data are maintained in DFAS 8500.1.

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Jerry S. Hinton
Director, Information and Technology