



OVERSIGHT AND
COMPLIANCE

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

March 21, 2019

MEMORANDUM FOR THE DEFENSE FINANCE AND ACCOUNTING SERVICE
COLUMBUS ACCOUNTING AND FINANCIAL SYSTEM

SUBJECT: Justification for the Use of Social Security Numbers in the DFAS Contract Debt System (DCDS), DITPR ID # 17264 - 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 support debt management and collection procedures for vendors supporting the DoD Components. The SSN must continue to be collected and stored in order to collect amounts owed to the Department, and satisfy the necessary tax reporting requirements established by the internal Review Service for further offsets. This system must be reviewed on a continuous basis and a new justification must be provided if any change to the system of records notice is submitted.

Please ensure that the 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.

If you have any questions, please contact Ms. Cheryl Jenkins at (703) 571-0026 or email, cheryl.d.jenkins2.civ@mail.mil.

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Cindy L. Allard
Chief, Defense Privacy, Civil Liberties,
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DEFENSE FINANCE AND ACCOUNTING SERVICE
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DFAS-ZT/IN

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY
DIVISION

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) and/or Tax Identification Numbers (TINs) – DFAS Contract Debt System (DCDS), Defense Information Technology Portfolio Repository Number 17264

1. DFAS Contract Debt System

Defense Finance and Accounting Service (DFAS) utilizes DCDS to manage and collect debts from vendors, contractors and individuals. This data contains SSNs and TINs required for collection purposes and, if necessary, tax reporting. Only DFAS users will access DCDS for processing and recording these transactions.

2. Documentation

As documented in the DCDS System of Record Number T7800 and Privacy Impact Analysis (PIA) documentation, DCDS is utilized to collect information from other financial systems for the purpose of debt collection. Attached at TAB A is the DCDS System of Records Notice. The DCDS PIA, signed and dated on June 19, 2017, is located at TAB B.

3. Authorized Uses

The justification for the use of the SSNs and/or TINs is Department of Defense (DoD) Instruction 1000.30, "Reduction of Social Security Number Use within DoD", dated August 1, 2012, Enclosure 2, Paragraph 2.c. (7) "Federal Taxpayer Identification Number". The DCDS requires input of SSN/TIN to locate Bill of Collections and offsets. The SSN/TIN is the highest level of invoice retrieval. It is also the only way to offset treasury offsets. Without the SSN/TIN, DCDS would not be able to match transactions with the Treasury debt records.

4. Point of Contact

For questions related to this memorandum contact Ms. Kenna Robinett, kenna.m.robinett.civ@mail.mil, (614) 701-2451.

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Aaron P. Gillison
Chief Information Officer

Attachments:
As stated