



DEFENSE FINANCE AND ACCOUNTING SERVICE
4800 MARK CENTER DR.
ALEXANDRIA, VA 22350-3000

DFAS-ZT

August 7, 2014

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of the Social Security Number (SSN) and/or Tax Identification Number (TIN) – **Defense Working Capital Fund Accounting System (DWAS)**

The Defense Finance and Accounting Service employs a system called Defense Working Capital Fund Accounting System (DWAS) to consolidated financial information from various Navy activities. It consists of several functional modules including: general ledger, funds distribution, fixed assets, cost accounting, A/P, A/R, billing, and reports. The data contains SSNs and TINs required for payment, collection, and tax reporting purposes. The last signed Privacy Impact Assessment (PIA) performed as part of the accreditation process was completed and signed on September 4, 2013.

The justification for the use of the SSN and/or TIN is DoDI 1000.30, Enclosure 2, Paragraph 2.c. (11), "Legacy System Interface". 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.

The authority for this DoD information system to collect, use, maintain, and/or disseminate Personally Identifiable Information (PII) is found in the following: 5 U.S.C. 301, Departmental Regulations; Department of Defense Financial Management Regulations, Chapter 20; 31 U.S.C. Sections 3511, 3512 and 3513; and E.O. 9397 (SSN). **The System of Records Notice (SORN) identifier for this system is T7335e**, while the DoD IT Portfolio Repository (DITPR) identifier for this system is 7.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The DWAS application supports payment, collection and reporting for DoD components. The SSN and TIN must continue to be collected and stored in order to disburse payments, process collections, and handle tax reporting requirements established by the Internal Revenue Service. The system in question, DWAS, has established user roles that safeguard the SSN and TIN.

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Date: 2014.10.01 17:10:00 -0400

Jerry S. Hinton
Director, Information and Technology



DEPARTMENT OF DEFENSE
DEFENSE PRIVACY AND CIVIL LIBERTIES DIVISION
241 18TH STREET SOUTH, SUITE 101
ARLINGTON, VA 22202-3405

October 20, 2014

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE (DFAS)
PRIVACY OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in DITPR Systems –
Accepted Pending Correction

Thank you for completing your review of Social Security Number (SSN) use within your DoD IT Portfolio Repository (DITPR) System. Removal of the SSN from your system is an important step towards reducing the Department's reliance on this sensitive information and fulfilling our obligation to protect the individuals about whom we maintain records. After review, the Defense Privacy and Civil Liberties Division (DPCLD) has accepted your justification for SSNs in the system, pending corrections (see attached).

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

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Date: 2014.10.24 15:40:45 -0400

Samuel P. Jenkins
Director for Privacy

Attachment:
As stated

**SSN Use Justification Memo for
DEFENSE FINANCE AND ACCOUNTING SERVICE (DFAS)
October 20, 2014**

DITPR Number System Name	DPCLO Findings	DPCLO Recommend Action
7/ Defense Working Capital Fund Accounting System (DWAS)	DITPR lists use case as (1) Geneva Conventions Serial Number, while Justification Memo suggests use case (11) Legacy System Interface, (4) Interactions with Financial Institutions, and (7) Federal Taxpayer Identification Number.	Please update DITPR to reflect the use case of (4) Interactions with Financial Institutions, or (7) Federal Taxpayer Identification Number.
13/ Operational Data Store (ODS)	DITPR lists use case as (11) Legacy System Interface. The Justification Memo also suggests use case (4) Interactions with Financial Institutions, and (7) Federal Taxpayer Identification Number may be applicable.	Please update DITPR to reflect the use case of (4) Interactions with Financial Institutions, or (7) Federal Taxpayer Identification Number as a stronger justification.
23/ Deployable Disbursing System (DDS)	DITPR lists use case as (11) Legacy System Interface. The Justification Memo also suggests use case (4) Interactions with Financial Institutions, and (7) Federal Taxpayer Identification Number may be applicable.	Please update DITPR to reflect the use case of (4) Interactions with Financial Institutions, or (7) Federal Taxpayer Identification Number as a stronger justification.
95/ Defense MilPay Office/ Defense MilPay Repository (DMO/DMR)	DITPR lists use case as (11) Legacy System Interface. The Justification Memo also suggests use case (4) Interactions with Financial Institutions, and (7) Federal Taxpayer Identification Number may be applicable.	Please update DITPR to reflect the use case of (4) Interactions with Financial Institutions, or (7) Federal Taxpayer Identification Number as a stronger justification.
838/ Defense Disbursing Analysis Reporting System (DDARS)	DITPR lists use case as (11) Legacy System Interface. The Justification Memo also suggests use case (4) Interactions with Financial Institutions, and (7) Federal Taxpayer Identification Number may be applicable.	Please update DITPR to reflect the use case of (4) Interactions with Financial Institutions, or (7) Federal Taxpayer Identification Number as a stronger justification.