



OVERSIGHT AND
COMPLIANCE

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

October 8, 2019

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE

SUBJECT: Justification for the Use of Social Security Numbers in the Standard Operations and Maintenance Army Research & Development System (SOMARDS) - DITPR #14 - 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 temporarily accepted your justification to use the SSN for the purpose of (11) Legacy System Interface. SOMARDS interacts directly with Automated Time and Attendance Payroll System (ATAAPS) and Defense Civilian Pay System (DCPS) via the SSN to compute and distribute employee labor costs and provide labor reports to management for financial reconciliation.

The Defense Finance and Accounting Service must begin taking steps to transition the SOMARDS to interface with ATAAPS and DCPS using the EDIPI / Department of Defense (DoD) ID number (ATAAPS and DCPS have EDIPI / DoD ID number capability). Please provide a Plan of Action and Milestones (POAM) for transitioning the system to interfacing with ATAAPS and DCPS via the EDIPI / DoD ID number. The POAM is due to DPCLTD no later than 60 days after the date of this letter.

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 of Records 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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Cindy L. Allard
Chief, Defense Privacy, Civil Liberties,
and Transparency Division



DEFENSE FINANCE AND ACCOUNTING SERVICE

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DFAS-ZT/IN

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY
DIVISION

THROUGH: DFAS-Indianapolis Privacy Office

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) – Standard Operations and Maintenance Army Research & Development System (SOMARDS), DITPR ID #14

SOMARDS is a mainframe computer-based financial management system which provides accounting services and management support for the Army Materiel Command (AMC), Army Test and Evaluation Command, Program Executive Offices, Installation Management Agency and Missile Defense Activities. SOMARDS is fully deployed and is in sustainment mode. SOMARDS provides fund control for direct appropriations, reimbursable customer orders, and logistics support activities as well as reporting for labor related reimbursable billings, advances, and general accounting expenses.

As documented in the System of Record Notice T7905, SOMARDS is utilized to collect information from Automated Time and Attendance Payroll System (ATAAPS) and Defense Civilian Pay System (DCPS) for the purpose of computing and distributing employee labor costs and providing labor reports to management for financial reconciliation. A signed copy of the Privacy Impact Assess is stored in the Enterprise Mission Assurance Support Service to serve as evidence of approval and compliance with privacy requirements.

The justification(s) for the use of the SSN in accordance with DoDI 1000.30, enclosure 2, Paragraph 2.c. (8), "Computer Matching", as necessary for performing required financial reconciliations between the two sourcing interface systems (AATAPS and DCPS) who collect this information directly from the impacted users. SOMARDS interfaces directly with the ATAAPS and indirectly with the DCPS through a shared direct interface with the Operational Data Store system. All of these systems utilize the SSN as a primary employee identifier in matching financial transactions in order to perform updates to the Department of Defense (DoD) Standard General Ledger. See the Department of Defense Financial Management Regulation (DoD FMR), Volume 7B, Chapter 28 for details. The URL address is http://comptroller.defense.gov/fmr/07b/07b_28

To ensure adequate protection and unnecessary use of Personally Identifiable Information, SOMARDS performs masking of the SSN. SSNs are automatically masked within the system to obscure this information for all basic users of SOMARDS. Designated "Sensitive Users" with an elevated "need to know" are allowed to view the SSNs directly. Access permissions of these special sensitive users are closely monitored and reported on a quarterly basis per DoD audit

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requirements. All output reports from SOMARDS that contain SSN information have masking on the first five positions of the SSN and only display the last four digits, for example XXX-XX-1234 and all interface partners who have a validated “need to know” for this information must have an appropriate Memorandum of Agreement on file and an Authority to Operate that designates that they are able to protect this information upon it being transferred out of the SOMARDS authority boundary.

For questions related to this memorandum, please contact Rosemary Fountain, System Manager, SOMARDS, rosemary.l.fountain.civ@mail.mil, (317) 212-0957.

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Director, Information and Technology

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