

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

November 13, 2019

## MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE, INFORMATION TECHNOLOGY

SUBJECT: Justification for the Use of Social Security Numbers in the Statement of Budgetary Resources - Automated Reconciliation Tool (SBR-ART) - 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 will allow the system to maintain SSNs for the purpose of conducting financial reconciliations. However, SSNs may not be accessed or viewed by end users in accordance with DoDI 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD." This system must be reviewed on a continuous basis and a new justification must be provided if any change to the system is submitted.

According to the Privacy Impact Assessment (PIA), the system does not interact directly with any financial institution. Also, Acceptable Use (7) Federal Taxpayer Identification Number, was not accepted. According to the PIA, the system only interacts with DFAS and other agency components via the EDIPI / Department of Defense ID number and not the Internal Revenue Service.

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 has not been updated.

If you have any questions, please contact Ms. Cheryl Jenkins at (703) 571-0026 or email, cheryl.jenkins8.civ@mail.mil.

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

cc:

**DFAS Privacy Office** 

#### DEFENSE FINANCE AND ACCOUNTING SERVICE



### 8899 East 56<sup>TH</sup> STREET INDIANAPOLIS, IN 46249-0201

DFAS-ZT November 15, 2018

# MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) and/or Tax Identification Number (TIN) – Statement of Budgetary Resources – Automated Reconciliation Tool (SBR-ART)

SBR-ART is an automated reconciliation and reporting system used to receive monthly process-to-process data, perform reconciliations, and provide monthly data reporting to DFAS users from the financial statement level down to the source feeder system detail level on the results of the reconciliations. The system does not collect Personally Identifiable Information (PII) directly from the individual but receives PII from the Electronic Data Interchange Personal Identifier (EDI/PI). Types of PII are Name, Truncated SSN, and SSN. The last signed Privacy Impact Assessment performed as part of the accreditation process was completed and signed on July 20, 2017.

The justification for the use of the SSN and/or TIN is Department of Defense (DoD) Instruction 1000.30, Enclosure 2, Paragraph 2.c. (4) "Interactions With Financial Institutions" and Enclosure 2, Paragraph 2.c. (7) "Federal Taxpayer Identification Number." Financial institutions may require individuals provide their SSN to open accounts. The SSN may also be required for systems, processes or forms in transactions with financial institutions.

The authority for SBR-ART to use, maintain, and/or disseminate PII is found in the following: 5 United Stated Code 301, Departmental Regulations; DoD Financial Management Regulations, 7000.14-R Volume 5; and Executive Order 9397 (SSN). The System of Records Notice for this system is DHRA 08 DoD, while the DoD IT Portfolio Repository identifier for this system is 16577.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The United States Air Force requires PII to identify, verify and authenticate personnel information to assist in proper payments. Reports containing PII are marked as For Official Use Only accordingly, and are processed and/or used; destroyed and/or retained as directed by the Privacy Act of 1974. Information is only shared with (1) those who demonstrate a need-to-know; (2) the individual; or (3) as allowed by the Privacy Act of 1974.

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Aaron P. Gillison
Director, Information Technology