



OVERSIGHT AND  
COMPLIANCE

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

May 3, 2019

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE

SUBJECT: Justification for the Use of Truncated Social Security Numbers in the Applications by Citizen Developers (ABCD) - 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 truncated SSN for the purpose of (11) Legacy System Interface. 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.

Acceptable Use (4) Interactions With Financial Institutions, was not accepted. The ABCD does not directly interact with any financial institution.

The Defense Finance and Accounting Service must begin taking steps to transition the ABCD to using the EDIPI / DoD ID number. Please provide a Plan of Action and Milestones (POAM) for the ABCD within 60 days of the date of this letter.

While this system has been identified as requiring the collection, maintenance and use of the truncated 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.d.jenkins2.civ@mail.mil](mailto:cheryl.d.jenkins2.civ@mail.mil).

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



## DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 EAST 56<sup>TH</sup> STREET  
INDIANAPOLIS, IN 46249

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February 20, 2019

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

**SUBJECT:** Justification for the Use of the Social Security Number (SSN) and/or Tax Identification Number (TIN) – Applications by Citizen Developers (ABCD)

The Defense Finance and Accounting Service employs a system called the Applications by Citizen Developers (ABCD) which contains two application modules to facilitate the timely issuance of finance reports and real time debt statuses. The purpose of the Unit Commander's Finance Report (UCFR) is to allow Defense Military Pay Offices and the U.S. Army to electronically access and certify financial reports. The purpose of the Debts and Claims Tool (DACT) is to automate the computation for out of service debts. The data contains SSNs and TINs required for payment, collection, and tax reporting purposes. The last signed Privacy Impact Assessment performed as part of the accreditation process was completed and signed on November 20, 2018.

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. 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." and Paragraph 2.c.(11), "Legacy System Interface. Many systems, processes, or forms that do not meet the criteria in subparagraphs 2.c.(1) through 2.c.(10) of this enclosure for the continued use of the SSN may not be able to transition to another identifier in a timely manner due to an interface with a legacy system still using the SSN, or due to the excessive cost associated with the change."

The authority for this DoD information system to collect, use, maintain, and/or disseminate Personally Identifiable Information (PII) is found in the following: 5 United States Code (U.S.C) 301, Departmental Regulations; DoD Financial Management Regulations, Chapter 20; 31 U.S.C. Sections 3511, 3512 and 3513; and Executive Order 9397 (SSN), as amended. The System of Records Notice identifier for this system is T7340, while the DoD IT Portfolio Repository identifier for the systems are 16576 (UCFR) and 17037 (DACT).

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The ABCD (UCFR & DACT) applications supports reconciliation 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. ABCD has the appropriate physical, technical, and administrative safeguards in place to safeguard the SSN and TIN. These safeguards include, but are not limited

to: secure facilities with controlled access of the computing infrastructure, implementation of network (firewall) and computing host intrusion prevention and detection hardware and software, Common Access Card authentication mechanisms, and implementation/continuous monitoring of proper user/role access control policies and procedures.

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Aaron P. Gillison  
Director, Information Technology