



OVERSIGHT AND
COMPLIANCE

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

May 29, 2019

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in the Call Recording Application Records (CRA) - 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 the justification for continued use of the SSN for the purpose of (13) Other Cases. DFAS records conversations between callers and customer service representatives (CSR) for training, business process improvement, quality assurance and to help resolve any misunderstandings or misperceptions caused by the customer CSR interaction. The SSN may be collected during the conversation (if necessary) to verify callers' financial account records. 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.

While this system has been identified as still requiring collection, maintenance, and use of the SSN, you must continue to ensure that the data is afforded the highest protections practicable through use of appropriate administrative, technical, and physical safeguards. Please maintain a copy of your justification and this memorandum 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 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
8899 E 56TH STREET.
INDIANAPOLIS, IN 46249

February 25, 2019

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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) – Call Recording Application Records (CRA)

The Defense Finance and Accounting Service (DFAS) employs a system called CRA. CRA records and indexes telephone conversations between customers and customer service representatives (CSRs) in DFAS contact centers. The centers are located in Cleveland, OH, Indianapolis, IN, Columbus, OH, and Rome, NY. CRA captures a sampling of the computer screens used by CSRs to answer inquiries. The inbound calls are recorded in order to resolve misunderstandings or misperceptions made during the customer-CSR interaction. This system facilitates the process of monitoring and evaluating the recorded audio and computer screens used by CSRs in order to provide training, quality assurance, and business process improvements. The recorded audio and captured systems' screen records and their indices include the following information: name, SSN, home address, telephone number, payroll information, marital status, dependent information, tax status, allotment, garnishment, debt, or other payroll or personal information provided by the customer. 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 07/02/2014.

The justification for the use of the SSN and/or TIN is DoDI 1000.30, Enclosure 2, Paragraph 2.c.(4) Interactions With Financial Institution. 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 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 identifier for this system is T5040, while the DOD IT Portfolio Repository identifier for this system is 8925.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The Call Recording 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, CRA, has established user roles that safeguard the SSN and TIN.

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Aaron P. Gillison
Director, Information and Technology