



OVERSIGHT AND
COMPLIANCE

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

May 15, 2020

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE,
INFORMATION TECHNOLOGY

SUBJECT: Justification for the Use of Social Security Numbers on the Corporate Electronic Document Management System (CEDMS) - 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 and has accepted your request to use the SSN for the following Acceptable Use: (11) Legacy System Interface. The CEDMS stores financial information which can be retrieved for evidentiary audit support, and certification on payments and collections. This information is retrieved by name and SSN and is used for the purpose of storing and retrieving financial documents. It is understood Defense Finance and Accounting Service does not have the capability to transition to the Department of Defense (DoD) Identification Number at this time.

The following requested Acceptable Uses are not authorized: (7) Federal Taxpayer Identification Number (the justification does not indicate the SSN is being used as a Federal Taxpayer Identification Number); (8) Computer Matching (the justification does not specify disclosure by DFAS of DoD records).

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 e-mail, 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

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DFAS-ZT/IN

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARANCY DIVISION

SUBJECT: Justification for the Use of Social Security Number (SSN) and/or Tax Identification Number (TIN) – Corporate Electronic Document Management System (CEDMS)

The Defense Finance and Accounting Service (DFAS) employs CEDMS to collect, store and maintain various types of hard copy source documents to include vouchers and disbursements, Form DD2875, contracts, litigation and other miscellaneous documents for the Department of Defense (DoD) and DFAS. Its primary function is to store financial information which can be retrieved for evidentiary audit support, and certification on payments and collections. This 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 May 15, 2019.

The authority for CEDMS to collect, use, maintain and/or disseminate Personally Identifiable Information 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 T7300c, and the DoD Information Technology Portfolio Repository identifier is 22756 CEDMS.

CEDMS is used to accommodate administrative requirements for DFAS. CEDMS has been referred to as a "web-based electronic file room." The system is an archival repository for specific DFAS documents after financial processing has been completed by relevant DoD organizations. CEDMS provides document management, record keeping, record retrieval, record staging and document security for management (i.e. scanning and indexing) of various types of hard copy source documents. These documents include vouchers (e.g. schedules of withdrawals and credits, vouchers for transfer between appropriations and/or funds, journal and cash collection, military pay, public vouchers for refund and debit vouchers) and disbursements (e.g. statement of accountability, schedule of canceled or undelivered checks). CEDMS stores information for all Military Services, Defense Agencies, Department of Veterans Affairs, and other DoD information systems for the purpose of storing financial information that can be retrieved for auditing.

The justification for the use of the SSN in accordance with DoDI 1000.30, Enclosure 2 consists of the following paragraphs: (7) Federal TIN, and (8) Computer Matching. The TIN justification for SSN use is used within CEDMS to search for documents and is an identifier to conduct those searches effectively and timely. The Computer Matching justification for SSN use is used within CEDMS when a document can only be searched using the SSN as the primary identifier. CEDMS is an archival repository for specific DFAS documents after any financial processing has been completed by the relevant DoD organizations.

CEDMS interfaces with legacy systems that still use the SSN as an identifier. Those systems have the SSN on documents where it is required by law, and require interoperability with organizations beyond the DoD, or are required by operational needs. It is also required to provide the SSN for systems and forms that interface with or act on behalf of individual organizations in transaction with financial institutions.

Access to the SSN is limited to personnel who have been properly trained and have a need to know status. Personnel who handle data that includes the SSN, protect it in accordance with guidance outlined in Enclosure 3 of DoDM 5200.01, Vol 4, DoD Information Security Program: Controlled Unclassified Information. Since record keeping, record retrieval and, document security for management (i.e., scanning and indexing) of various types of hard copy source documents are part of the CEDMS process, it is imperative that the SSN is an authorized use in CEDMS. There are currently over 2,972 different document types within the CEDMS repository.

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Aaron P. Gillison
Director, Information Technology