



DEPARTMENT OF DEFENSE  
DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE  
241 18<sup>TH</sup> STREET SOUTH, SUITE 101  
ARLINGTON, VA 22202-4512

July 15, 2014

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE PRIVACY  
OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in DITPR System  
Number 32 – Accept Pending Correction

Thank you for completing your review of Social Security Number (SSN) use within your DoD IT Portfolio Repository (DITPR) System. Removal of the SSN from your system is an important step towards reducing the Department's reliance on this sensitive information and fulfilling our obligation to protect the individuals about whom we maintain records. After review, the Defense Privacy and Civil Liberties Office (DPCLO) has accepted your justification for SSNs in the system, pending corrections (see attached).

If you have any questions, please contact Ms. Viki Halabuk at (703) 571-0070 or e-mail [wiki.l.halabuk.civ@mail.mil](mailto:wiki.l.halabuk.civ@mail.mil).

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Samuel P. Jenkins  
Director for Privacy

Attachments:  
As stated.

**SSN Use Justification Memo for  
DEFENSE FINANCE AND ACCOUNTING SERVICE**

**July 15, 2014**

<b>DITPR Number System Name</b>	<b>DPCLO Findings</b>	<b>DPCLO Recommend Action</b>
32/Defense Debt Management System (DDMS)	DITPR lists case use as (7) Federal Taxpayer Identification Number while Justification Memo lists case use as (11) Legacy System Interface.	Please update either the Memo or DITPR so case use matches.



DEFENSE FINANCE AND ACCOUNTING SERVICE

ARLINGTON

4800 MARK CENTER DR.  
ALEXANDRIA, VA 22350-3000

DFAS-ZT

September 13, 2013  
July 9, 2013

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) – Defense Debt Management System (DDMS)

The Defense Finance and Accounting Service employs a system called the Defense Debt Management System (DDMS) to manage and collect debts from individuals. This data contains SSNs and TINs required for collection purposes and, if necessary, tax reporting.

The justification for the use of the SSN and/or TIN is DoDI 1000.30, Enclosure 2, 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. In these cases, the continued use of the SSN may be acceptable for a specified period of time, provided that formalized, written plans are in place for the migration away from the SSN in the future. Plans to alter these use cases must take into account interactions with other applications as well as all methods for entry, processing, or transfer of information from said application. It is critical that transfer away from the SSN does not cause unacceptably long interruptions to continued operations.

The authority for this DoD information system to collect, use, maintain and/or disseminate Personally Identifiable Information (PII) is found in the following: 5 U.S.C. 301, Departmental Regulations, 5512, 5513, 5514, and 5584; 10 U.S.C. 1442, 1453, 2774, 2775, 9835; 31 U.S.C. 3325, 3342, 3526, 3701, 3702, 3711, 3716-3718; 32 U.S.C. 710, 716; 37 U.S.C. 1007(c); 40 U.S.C. 721, 723, 725, 726, 727, 728, 729; the Debt Collection Act of 1982 (Pub.L. 97-365, as amended by Pub.L. 104-134, the Debt Collection Improvement Act of 1996); Pub.L. 89-508; E.O. 9397 (SSN) as amended; and DoD 7000.14-R, Department of Defense Financial Management Regulation (DoD FMR), Volume 5, Part Two, Chapter 28. The System of Records Notice (SORN) identifier for this system is T7332, while the DOD IT Portfolio Repository (DITPR) identifier for this system is 32.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The DDMS application supports debt management and collection procedures for DoD components. The SSN and TIN must continue to be collected and stored in order to collect amounts owed to the Department, and satisfy the necessary tax reporting requirements established by the Internal Revenue Service for further offsets. The system in question, DDMS, has established user roles that safeguard the SSN and TIN.

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Jerry S. Hinton  
Director, Information and Technology

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