



DEPARTMENT OF DEFENSE
DEFENSE PRIVACY AND CIVIL LIBERTIES DIVISION
241 18TH STREET SOUTH, SUITE 101
ARLINGTON, VA 22202-3405

November 20, 2014

MEMORANDUM FOR DEFENSE FINANCE AND ACCOUNTING SERVICE (DFAS)
PRIVACY OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in the Adoption
Reimbursement System (ARS) – Accepted

Thank you for completing your review of Social Security Number (SSN) use within your system. After review, the Defense Privacy and Civil Liberties Division (DPCLD) has accepted your request that this system be allowed to continue using SSNs as a Legacy System. As a Legacy System, the DPCLD requires that your system be re-evaluated in two years' time. It is expected that by the next review of this system a more comprehensive plan be prepared for the removal of the SSN, including the identification of funding necessary for any transition.

While this system has been identified as requiring collection, maintenance, and use of the SSN at this time, you must continue to ensure that this 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 memo in your records.

If you have any questions, please contact Mr. Brent Bice at (703) 571-0070 or e-mail brent.j.bice.civ@mail.mil.

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Date: 2014.11.25 16:03:38 -0500

Samuel P. Jenkins
Chief



**DEFENSE FINANCE AND ACCOUNTING SERVICE
ARLINGTON**

4800 MARK CENTER DR.
ALEXANDRIA, VA 22350-3000

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for use of the Social Security Number (SSN) – Adoption
Reimbursement System (ARS)

The Defense Finance and Accounting Service (DFAS) utilizes the ARS to reimburse active duty military members for certain expenses associated with an adoption as authorized by Title 10, U.S.C, section 1052. The SSN is used for verification and identification purposes necessary to process a reimbursement claim for adoption expenses.

The justification for the use of the SSN is DoDI 1000.30, Enclosure 2, Paragraph 2.c (11) "Legacy System Interface". ARS interfaces with a legacy pay system (Automated Disbursing System) which works with the SSN as the primary and accepted means of identifying a military member. As there are many members with the same first and last name, the SSN is used to ensure the right member is being paid.

DFAS has documented the requirement to collect SSN(s) in its pending System of Records Notice (SORN) and Privacy Impact Assessment as referenced in DoDI 1000.30. Once published, the SORN ID will be T7347.

Justification for the use of the SSN does not constitute blanket permission to use the SSN. Because the Adoption Reimbursement System is used to make payments authorized under federal law, the SSN must be collected and stored in order to identify that the proper member's account is being accessed and to verify that the member has not exceeded the annual allowance permitted under the law. ARS has a number of safeguards in place to protect access to SSNs, to include: only including the last four numbers in official correspondence, limiting access through user roles, Common Access Card enabling the system, limiting access to .mil traffic, and by maintaining the system on the DFAS ELAN. At any given time, the ARS is accessed by at most five (5) users, and these are all internal to DFAS.

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ou=DFAS, cn=HINTON.JERRY.S.1229587176
Date: 2013.07.25 20:26:30 -0400

Jerry S. Hinton
Director, Information and Technology