



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

April 7, 2015

MEMORANDUM FOR THE DEFENSE FINANCE AND ACCOUNTING SERVICE
PRIVACY OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in Call Recording
Application Records (CRA)– 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 has accepted your justification for continued use of the SSN for the purpose of (4) Interactions with Financial Institutions. Further review of this system will not be required under DoD's current SSN Reduction plan. While this system has been identified as still requiring collection, maintenance, and use of the SSN, 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.

ERWIN.WILLIAM.L
YLE.1116783610

Digitally signed by
ERWIN.WILLIAM.LYLE.1116783610
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=OSD,
cn=ERWIN.WILLIAM.LYLE.1116783610
Date: 2015.04.29 08:44:30 -04'00'

William L. Erwin
Acting Chief



DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 E 56TH STREET.
INDIANAPOLIS, IN 46249

DFAS-ZT

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.

GILLISON.AARON.
PETER.118090529
0

Digitally signed by
GILLISON.AARON.PETER.118090529
DN: c=US, o=U.S. Government, ou=DoD,
ou=PKI, ou=DFAS,
cn=GILLISON.AARON.PETER.118090529
Date: 2015.02.27 13:32:06 -05'00'

Aaron P. Gillison
Director, Information and Technology