



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

April 29, 2013

MEMORANDUM FOR THE DEFENSE FINANCE & ACCOUNTING SERVICE PRIVACY
OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in DITPR System
Number 1666 – Accepted

Thank you for completing your review of Social Security Number (SSN) use within your system. After review, the Defense Privacy and Civil Liberties Office has accepted your justification for continued use of the SSN for the purpose of (7) Federal Taxpayer Identification Number. **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 Ms. Viki Halabuk at (703) 571-0070 or e-mail viki.halabuk@osd.mil.

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Samuel P. Jenkins
Director for Privacy



DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 EAST 56TH STREET
INDIANAPOLIS, INDIANA 46249

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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 Numbers (TIN) – **Contract Debt System**

The Defense Finance and Accounting Service utilizes a system called the Contract Debt System (CDS) to manage and collect debts from vendors, contractors and 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 TINs is DoDI 1000.30, Enclosure 2, Paragraph 2.c. (7) "Federal Taxpayer Identification Number". The application of Federal and State income tax programs rely on the use of the SSN and TIN. As such, systems that have any function that pertains to the collection, payment, or record keeping of this use may contain the SSN and TIN. Additionally, individuals who operate businesses under their own name may use their SSN as the tax identification number for the business entity.

The authority for this DoD information system to collect, use, maintain and/or disseminate Personally Identifiable Information is found in the following: Internal Revenue Code (IRC) Title 31 U.S.C. Subtitle III, Chapter 33, Subchapter II Money and Finance Section 3325; Internal Revenue Code (IRC) Title 26 U.S.C. Subtitle F: 6041, 6041A, 6041-3, 6050, 6050M; Department of Defense Financial Management Regulation (DoD FMR) 7000.14-R, Volume 10, Chapter 6, 12, 18, and 23; Federal Acquisition Regulation 4.9, 52.204; and Internal Revenue Publication 1220 and 1099 General Instructions. DOD IT Portfolio Repository 1666 (DITPR) applies to this system.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The CDS application supports debt management and collection procedures for vendors supporting the 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 CDS established user roles that safeguard the SSN and TIN.

Michele A. Gomez
Director, Accounting Standards and Reporting