



UNITED STATES TRANSPORTATION COMMAND

508 SCOTT DRIVE
SCOTT AIR FORCE BASE, ILLINOIS 62225-5357

24 MAY 2021

MEMORANDUM FOR DEFENSE PRIVACY CIVIL LIBERTIES AND TRANSPARENCY DIVISION

FROM: COL Andras M. Marton, Staff Judge Advocate and Senior Component Official for Privacy,
U.S. Transportation Command

SUBJECT: Justification for the Use of Social Security Numbers (SSN) – Transportation Financial
Management System; Department of Defense (DOD) Information Technology (IT)
Portfolio Repository (DITPR) System ID 0217

1. This memorandum provides justification for the continued SSN use as part of the Transportation
Financial Management System (TFMS).

2. BACKGROUND:

a. The TFMS is a customized commercial-off-the-shelf Oracle Enterprise Business Suite (EBS) financial system used by the Military Surface Deployment and Distribution Command (SDDC) for financial management and reporting. SDDC owns TFMS but USTRANSCOM funds¹ the system. SDDC uses the TFMS to support contract execution with suppliers who facilitate the SDDC transportation mission via air, land, and sea, and for internal SDDC accounting functions.² SDDC limits the TFMS SSN use to processing SDDC personnel payroll and travel entitlements.

b. The following System of Record Notices (SORNs) cover SDDC's SSN limited TFMS collection and use: (1) T7206a, General Accounting and Finance System Base Level (GAFS-BL); (2) DHRA³ 08 DOD, Defense Travel System; and (3) T7335, Defense Civilian Pay System (DCPS).

c. The TFMS SSN use is limited to processing SDDC personnel payroll and travel entitlement disbursements through the Defense Finance and Accounting Service (DFAS). The TFMS interfaces with several DFAS systems,⁴ U.S. Bancorp Inc. Customer Automation and Reporting Environment, and the Department of Treasury, to ensure payment accuracy of payroll and travel entitlements.

¹ Per DOD verbal guidance, the funding organization prepares the SSN justification memorandum.

² Internal accounting functions include payroll, timekeeping, travel, accounts payable, accounts receivable, and fixed asset accounting.

³ Defense Human Resources Activity.

⁴ Defense Civilian Payroll System, Centralized Disbursing System, Centralized Electronic Funds Transfer, Department Cash Management System, General Accounting and Finance System-Reengineering, and the Defense Travel System. The Defense Travel System (DTS) is covered by SORN DHRA 08 DOD and the Defense Civilian Pay System (DCPS) is covered by SORN T7335.

3. APPLICABLE REGULATION PROVISIONS: DODI 1000.30, Enclosure 2, paragraphs 2.c.(4), Interactions with Financial Institutions; 2.c.(7), Federal Taxpayer Identification Number; 2.c.(8), Computer Matching; and 2.c.(11), Legacy System Interface, provide authority for continued SSN use. DTS and DCPS are DOD legacy systems requiring the SSN to process payroll and travel entitlements. Additionally, the DFAS requires the SSN as the Federal taxpayer identification number when interacting with Federal and state income tax programs.

4. ANALYSIS:

a. The TFMS Program Manager, the USTRANSCOM Information Assurance Manager, and the USTRANSCOM Privacy Officer reviewed the TFMS system requirements for this justification. The Command's mission requires the continued SSN use to process SDDC personnel payroll and travel entitlements.

b. A combination of technical, administrative, and physical security controls protect the SSNs in the TFMS program from unauthorized access. The attached DD Form 2930, Privacy Impact Assessment details the specific security controls implemented. In addition, as part of a secondary authentication process, the TFMS uses Identity and Access Manager (IAM)⁵ software as another layer of authentication protection. SDDC uses SDDC Form 417, *SDDC Transportation Financial Management System (TFMS) Access Request*, to collect PII in order to establish TFMS user accounts. OMB No. 0704-0587 approved SDDC Form 417 for this use.

5. ELIMINATION PLAN: IAW DODI 1000.30, the TFMS must continue SSN use in processing SDDC personnel payroll and travel entitlements until the SSN is no longer used by the legacy systems listed in paragraph 2.c. above. USTRANSCOM checks legacy systems annually to see if new regulations have changed the requirement for continued SSN use.

6. The point of contact for this memorandum is Ms. Tammy Hickey at (618) 220-4100/4114 or email: transcom.scott.tcja.mbx.foia@mail.mil.


ANDRAS M. MARTON
COL, JA
Senior Component Official for Privacy

Attachment:
DD Form 2930, TFMS Privacy Impact Assessment

⁵ IAM is a commercial-off-the-shelf software that regulates and enforces user access.