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MEMORANDUM

From: Deputy Chief for Medical Research and Development, U.S.
Navy Bureau of Medicine and Surgery (Code M2)
To: Dr. Nancy Crum-Cianflone, Naval Health Research Center
Via: Commanding Officer, Naval Medical Research Center

Subj: JUSTIFICATION FOR THE USE OF THE SOCIAL SECURITY NUMBER
(SSN); SORN N6150-5, MILLENIUM COHORT STUDY

1. Under System of Records Notice (SORN) N06150-5, the Millennium Cohort Study data are collected to assist US policy makers with understanding long-term health outcomes that may be associated with military service, especially of deployment and service in hostile operations. Specifically, the study seeks to track the development of major chronic, physical, and psychiatric illnesses among veterans, and establish risk factors through temporal sequence of exposure and health outcome.

2. Continued use of SSN is justified for this system in accordance with DODI Instruction 1000.30 (8): Computer Matching. Continued capture and use of SSNs are necessary for computer matching of electronic sponsor demographic and exposure data with deployment, occupational, vaccination, and healthcare utilization data related to individual health status. The Millennium Cohort Study matches existing records or specimens to those contained in other DoD electronic data sources (SSNs would be destroyed prior to data analysis). The use of SSN as a unique identifier is needed for this database where there is potential for duplicate registration and no other means of unique identification exists. Therefore the elimination of SSNs would prevent the ability to link sponsor demographic and exposure data from DoD electronic data sources to measures of health outcomes.

3. To reduce the vulnerability of SSNs, records are maintained in a secure, access-controlled facility. Physical entry is restricted by the use of locks and guards, and is accessible only to authorized personnel. Access to PHI, including SSNs, is restricted to onsite investigators who are staff on an Institutional Review Board (IRB) approved protocol and who have signed the Investigator Compliance Attestation to abide by all privacy protection regulations. No identifiable data will be disclosed to other entities without the authorization of the record holder. Further, access to electronic data requires a

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Common Access Card used in conjunction with a personal identification number. After data matching is finalized for a particular project, SSNs are stripped from the final analytic file. Since inception in 2001, the Millennium Cohort Study has not had any security issues.

4. The US Department of Defense (DoD) is challenged with monitoring and protecting the health of its service members and their families. The Millennium Cohort Study is an essential tool in meeting this challenge. The use of SSNs for this effort is justified, and efforts to reduce the vulnerability of SSNs are appropriate. Until an acceptable substitute for SSNs is identified, the collection and use of SSNs for N06150-5 is permissible.



B. A. DOLL