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HEALTH AFFAIRS**

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SEP 26 2012

MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Use of the Social Security Number in the Enterprise Blood Management System; Department of Defense Information Technology Portfolio Repository Identification 13520

This memorandum satisfies the requirements established in the Office of Under Secretary of Defense Personnel and Readiness (P&R) Directive-Type Memorandum 2007-015-USD (P&R), "DoD Social Security Number (SSN) Reduction Plan" (DTM 07-015), with respect to the Enterprise Blood Management System (EBMS), a new system of record. The system of records notice (SORN) currently applicable to EBMS is DHA 07, Military Health Information System (March 30, 2006, 71 Federal Record 16127 (Attachment 1)). A separate SORN for EBMS is with the Office of the Secretary of Defense/Joint Staff Privacy Office for approval. The Department of Defense (DoD) Information Technology Portfolio Repository identification assigned to EBMS is 13520. This memorandum provides justification for the collection and use of social security numbers by EBMS. The Privacy Impact Assessments for the two applications underlying EBMS became effective May 17, 2011, Blood Donor Management System (Attachment 2), and December 2, 2011, Blood Management Blood Bank/Transfusion System (Attachment 3).

EBMS is a commercial-off-the-shelf (COTS) Enterprise Blood Management System that will replace the Defense Blood Standard System (DBSS) platform at garrison and specified theater locations. EBMS employs functionality from two separate and distinct Food and Drug Administration (FDA) regulated Class II Medical Devices: Blood Donor Management System (BDMS) and Blood Management Blood Bank/Transfusion System (BMBB/TS). This strategic technology modernization project enhances the DoD Blood Program capabilities for Donor Center and Blood Bank/Transfusion Services through the seamless integration of blood products inventory management, transport, availability, and most importantly traceability from inception to disposition within the electronic health record. EBMS enhances the Armed Services Blood Program's ability to manage the DoD blood supply activities in the continental United States, outside the continental United States, and in theater. These activities include blood donation, manufacture, shipping, and transfusion events.

Attachment 1 to DTM 07-015 specifies acceptable uses of SSNs in paragraph 2c. Acceptable uses applicable to EBMS include 2c(11), Legacy System Interface; 2c(12), Other Cases; and 2c(8), Computer Matching.

Individuals who may be blood donors and blood recipients include members of the Uniformed Services, DoD civilian employees, and DoD contractors. However, employees of other government agencies, non-DoD civilians, and foreign nationals may be blood donors and

blood recipients as well. Consequently, many donors and recipients with records within EBMS will not have DoD Identification Numbers/Electronic Data Interchange Personal Identifiers (DoD ID Numbers), necessitating the collection of their SSNs to assure proper donor identification. For individuals without DoD ID numbers, their SSNs, together with their name and date of birth, are essential for positively identifying the individual and the individual's records within EBMS.

From guidance on the use of SSN by DoD, the Other Cases Acceptable Use applies to collections and uses of SSNs that specifically require the presentation of the SSN to meet a statutory or regulatory requirement. EBMS, a Class II medical device, is subject to the regulatory requirements of the FDA, specifically, 21 Code of Federal Regulations 606.160. This regulation discusses records retention periods for blood and blood components, and states: "record[s] shall be available from which unsuitable donors may be identified so that products from such individuals will not be distributed." The regulation also identifies the requirement to have an indefinite record retention period. Because of these FDA requirements, EBMS must maintain and be able to accurately retrieve individual's donor records, including SSNs for civilian donors.

In accordance with Acceptable Use Case 11, for Legacy Systems, EBMS is expected to continue maintaining SSNs through Use Case 11, Legacy System Interface, due to FDA requirements and the need to interface with other DoD systems that continue to use SSNs as an identifier. FDA has requirements for assigning donor numbers that link donors to blood products and the disposition of these products. For the Armed Services Blood Program, the SSN is used to inextricably link donors to blood products and donations. As such, the EBMS mitigation strategy to reducing the use of SSNs is to accept alternate identification numbers, such as driver's license numbers, and to mask the SSN when an alternate number is not an option. The COTS has tested and implemented a system change request that masks and unmask the SSN within EBMS.

Both the donor (BDMS) and recipient (BMBB/TS) components of EBMS must use SSNs for operational necessity and to effectively interface to the Military Health System's (MHS) hospital/laboratory information system, currently the Composite Health Care System (CHCS). CHCS, a legacy system, currently uses SSNs as a primary identifier. Once BMBB/TS is integrated with the MHS family, blood type and other testing information will interface with the appropriate MHS systems.

Acceptable Use Case 8, Computer Matching, applies to "systems, processes, or forms that interact with other Government agencies [that] may require the continued use of the SSN as a primary identifier [for] transferring, matching, or checking information." To meet FDA requirements relating to MHS' capability to maintain required blood records indefinitely and to be able to identify donors and blood products for adverse event investigation and deferral listings, particularly with respect to donors who do not have DoD ID numbers, such matching activities may also occur in connection with interagency blood supply cross-matching and auditing activities.

My point of contact for EBMS and this memorandum is Mr. Chester Alexander, DHIMS EBMS Project Manager, who may be reached at (703) 681-3914 or at Chester.Alexander@tma.osd.mil.



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Attachment:
As stated