

MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Collection of Social Security Numbers on New Department of Defense Forms, "Ebola Virus Disease Redeployment Health Assessment and Medical Clearance Form; and EBV Exposure Risk Evaluation Form

Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012, requires a memorandum to justify collecting and using Social Security Numbers (SSNs) on Department forms. This justification memorandum pertains to the creation of two new DoD Forms (DD Form): DD Form 2990, Ebola Virus Disease Exposure Risk Evaluation (In Theater Use Only), and DD Form 2991, Redeployment Health Assessment and Medical Clearance, included as Attachments 1 and 2, respectively. These new DoD Forms will be used to collect PII and PHI on DoD personnel relative to potential Ebola Virus Disease (EBV) exposure.

As DoD personnel (Service members, civilian employees and contractors) are deployed to Ebola outbreak areas, they will be subjected to rigorous screening, training and monitoring for exposure to the Ebola virus. The two new forms above will be used during their deployment and just prior to redeployment to allow identification, tracking and treatment of patients to contain the health threat presented by the virus. The information will provide for the apprehension, detention, or conditional release of individuals to prevent the introduction, transmission, or spread of suspected communicable diseases, pursuant to section 361(b) of the Public Health Service Act. The information will also be collected in order to identify any health concerns and to refer individuals for additional assessment and/or care. The overall intent is to protect the health of the individual and public from EBV. This information will also be included in deployer's medical records.

The authority for the collection of this information is 10 U.S.C. 1074f, Medical Tracking System for Members Deployed Overseas; 10 U.S.C. 1074m, E.O. 13295, Revised List of Quarantinable Communicable Diseases; DoDI 6490.03, Deployment Health; and E.O. 9397 (SSN), as amended. PII collected through these forms include the deployer's SSN, together with the deployer's name, address, phone number, and self-reported status information. Health care providers review deployers' responses on these forms. The forms are secured to protect PII in accordance with DoD regulations either in hard copy format or as processed electronically.

The SSN provided on the two forms is used in conjunction with other patient information, to ensure the necessary maximum amount of information is being obtained to properly and accurately identify, track, and treat patients to avoid the risk of death and or spread of the disease. Due to Ebola's classification as a "Quarantinable Communicable Disease" per E.O. 13295, the full Social Security Number is necessary for the following reasons:

- To ensure positive identification of the exposed or ill individual
- To ensure civilian public health and medical authorities are notified of the individual's identity when necessary to protect the health of the public, facilitate contact tracing
- To ensure proper medical care if the patient is transferred to a non-DoD facility and in connection with required reporting to public health authorities, as the individual's DoD Identification Number cannot be used as an individual identifier outside of a DoD business process. This use of the SSN is consistent with the HIPAA Privacy Rule (45 CFR Parts 160 and 164) as the information may also be provided outside of the DoD and the SSN is still the most common and accurate method for identification of U.S. Citizens in and outside the United States.

The above reasons support collection of full SSNs and their use through DD Forms 2990 and 2991 under DoDI 1000.30, ENCLOSURE 2, paragraph 2.c, ACCEPTABLE USES. The Acceptable Uses application to this collection and use of SSNs are found in paragraphs 2.c(8) (Computer Matching) and 2.c(11) (Legacy System Interface)

If you have any questions concerning the information provided in this memorandum, please contact LtCol Brian Blalock, who can be reached at 703-681-6880.