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HEALTH AFFAIRS**

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TRICARE  
MANAGEMENT  
ACTIVITY

MAR - 9 2012

MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Use of the Social Security Number in the Department of Defense Suicide Event Report; Department of Defense Information Technology Portfolio Repository Identification 13190

This memorandum is written to satisfy the requirements established in the Office of the Under Secretary of Defense for Personnel and Readiness (USD(P&R)) Directive-Type Memorandum (DTM) 07-015-USD(P&R), "DoD Social Security Number (SSN) Reduction Plan" with respect to the Department of Defense (DoD) Suicide Event Report (DoDSER). The DoD Information Technology Portfolio Repository Identification assigned to DoDSER is 13190. This memorandum provides justification for the continued collection and use of SSNs by DoDSER. The System of Records Notice applicable to DoDSER is Defense-Health Affairs (DHA) 20 (May 6, 2010, Volume 75 Federal Register 24928) (attached). The Privacy Impact Assessment for DoDSER became effective June 25, 2010 (attached). The DoDSER Plan of Actions and Milestones (POAMs) for elimination of the use of SSNs is included as an attachment. We are not aware of any Paperwork Reduction Act requirements with respect to DoDSER data collection.

DoDSER is a population-based surveillance system that provides integrated enterprise and survey data used for direct reporting of suicide events and on-going population-based health surveillance activities. DoDSER is used to collect information on Active Duty and Reserve military personnel and members of the National Guard with reportable suicide and self-harm behaviors, including suicide attempts, self-harm behaviors, and suicidal ideation. All other DoD Active and Reserve military personnel records collected without evidence of reportable suicide or self-harm behaviors exist as a control group. An individual's record within DoDSER includes the individual's SSN.

DoDSER records are integrated from enterprise systems and also developed from record reviews and interviews to create a set of standardized data items regarding suicide and self-harm behaviors. Data collected over time is connected to create longitudinal records of an individual's ideation, self-harm behaviors, and/or suicides. Surveillance activities conducted through DoDSER include the systematic collection, analysis, interpretation, and reporting of outcome-specific data for use in planning, implementation, evaluation, and prevention of suicide behaviors within DoD.

DTM 07-015, Paragraph 2.c.(11), includes “Legacy System Interface” as an acceptable use of SSNs so long as there are plans in place for the migration away from SSNs in the future. The discussion below sets forth why SSNs still need to be currently collected in DoDSER under Acceptable Use Case 2.c.(11).

DoDSER is an active surveillance program, particularly with respect to individuals whose information is in DoDSER as a result of a suicidal ideation event or a self-harm behavior event. DoDSER data regarding an individual is obtained from both DoD and non-DoD sources. Although a DoD data source may be able to identify an individual’s record in a DoD system through the individual’s Electronic Data Interchange - Personal Identifier (EDI-PI), the EDI-PI is not an identifier used by non-DoD data sources (such as law enforcement agencies and/or state and local governments). These non-DoD data sources, however, generally are able to identify an individual through the individual’s SSN, coupled with another identifier such as the individual’s name. If DoDSER does not collect an individual’s SSN, it will not be able to request or connect, with a requisite degree of certainty, non-DoD sourced data relevant to an individual’s suicide, suicidal ideation, or self-harm behaviors.

As previously referenced, DoDSER provides a longitudinal record of individuals with prior histories of self-harm behaviors and suicidal ideation. Creation of accurate longitudinal data requires the capacity to relate new DoDSER data with data that has been previously collected within DoDSER (including new and existing DoDSER data obtained from non-DoD sources). A common identifier that may be used to connect old and new data and records, whether created within DoD or by a non-DoD source, is the individual’s SSN. Accurate longitudinal records are essential to ongoing population-based health surveillance activities and for developing statistical summaries needed by federal, state, and local governments for health surveillance and research activities (See DHA 20, attached). Without a SSN, the difficulty in creating accurate and detailed longitudinal records creates risks to DoDSER’s capacity to provide the intended surveillance and analytical data.

In addition, one of the key purposes of the DoDSER program is to support research. A critical requirement to accomplish this purpose is the ability to link DoDSER data to other databases, including non-DoD databases (e.g., Department of Veterans Affairs’ databases). An individual’s SSN is the single most important variable for matching cases in the DoDSER database to other non-DoD databases prior to de-identifying data for research.

The DoDSER program has taken significant steps to reduce the vulnerability of SSNs. For example, the program does not permit individuals to retrieve a DoDSER case by SSN (or other personally identifiable variable) 180 days after the DoDSER record is submitted. This significantly reduces the chances of inappropriate or accidental releases of personally identifiable data, since cases are “locked” by the system after 6 months. In addition, the system uses role-based accounts to ensure that users have access to only the specific cases they need in order to accomplish their mission. The vast majority of users are basic data entry users, and they can

only access cases that they personally submitted through the system. They cannot view SSNs or other data submitted by others. Furthermore, when the data is used for surveillance or research purposes, the data is only used in aggregated group analyses (e.g., de-identified forms). Personally identifiable data is not placed into analytical reports.

The DoDSER program has developed a POAM for the elimination of the use of SSNs (attached). The program will evaluate potential alternatives to SSNs and examine the costs and business requirements associated with shifting to an alternative.

If there are any questions, the point of contact is Gregory Gahm, PhD. Dr. Gahm may be reached at (253) 968-2282, or Gregory.Gahm@us.army.mil.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

W. Bryan Gamble, M.D., FACS  
Brigadier General, US Army  
Deputy Director

Attachments:  
As stated