

MEMORANDUM FOR THE RECORD

Subj: JUSTIFICATION FOR THE USE OF THE SOCIAL SECURITY NUMBER (SSN)
 SPAWAR (PEO EIS PMW 240) - Risk Management Information (RMI) - DITPR-DON ID: 22841

(Form number and name or IT system name and DITPR DON ID number)

System Description:

This system provides for a centralized location for the user-input and storage of information pertaining to deaths, injuries and occupational illnesses as required of Federal governmental agencies by the Occupational Safety and Health Administration (OSHA). The summary data of death, injuries or illnesses maintained in this system will be used for analytical purposes to improve the performance of Department of the Navy's accident prevention policies, procedures, standards, and operations, as well as ensure internal data quality assurance.

Operational Necessity for SSNs:

Department of Defense Instruction (DoDI) 6055.07 (Mishap Notification, Investigation, Reporting, and Record Keeping) requires DoD components to collect SSN as part of the Minimum Data Requirements for Mishap Reports initiative. SSN is used as the common link for personnel information to tie mishap information with authoritative data sources such as the Medical Data Repository (Defense Health Agency) and the Defense Casualty Information Processing System (DCIPS). SSN is also used for the retrieval of historical and/or archived records from various systems and databases that will be consolidated within the RMI program (e.g. Web Enabled Safety System (WESS), Medical, Mishap and Compensation (MMAC), Portsmouth Naval Shipyard Occupational Accident and Injury Reporting System (POAIRS)).

Laws or Regulations:

In addition to DoDI 6055.07, OPNAVINST 5102.1 (Mishap Investigation and Reporting), and OPNAVINST 3750.6 series require the capture of SSN for mishap reporting to be in compliance with the DoD Instruction.

Impact and Estimated Cost if Eliminated:

DoDI 6055.07 directs the "Establish[ment of] procedures that allow for the proper and minimally necessary release and use of protected health information in the support of military and civilian injury identification, investigation, reporting, and record keeping consistent with Reference (o)." Reference (o) is Directive-Type Memorandum 07-015 (DoD Social Security Number (SSN) Reduction Plan, 28 March 2008). The procedure to accomplish this, however, has not yet been established or implemented across the entire DoD or DON. Until a replacement identifier (i.e. DoD ID/EDIPI) for personnel has been established and implemented across all mishap, medical, casualty, and personnel data at the enterprise level, SSN must be used as the means to tie the data sources together. Cessation of the collection of SSN for new mishap and incident reports will require the update of DoDI 6055.7. The transition to a replacement identifier for historical records will also require the update of OPNAVINST 5102.1 and OPNAVINST 3750.6 series instructions.

The cost and level of effort for the removal of SSN from historical and archived data will require investigation by the COTS vendor and integration team, and depends upon the format in which historical data is ingested (e.g. files transferred to the same server vs. historical records fully integrated with new system's record format.

James King by direction
 Signature (Flag, SES, or by direction)

PEO-EIS
 Title and Code

SPAWAR
 Command