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**DHA Privacy
Office Review**

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES AND TRANSPARENCY DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) in DD Forms 2990 and 2991 within the Defense Medical Surveillance System (DMSS); Department of Defense Information Technology Portfolio Repository (DITPR) Identification #1236, UII: 000000077

This memorandum is to satisfy the requirements of the *Department of Defense Instruction (DoDI) 1000.30, Reduction of Social Security Number (SSN) Use Within DoD*, dated August 1, 2012, that requires justification to collect and use the SSNs on Department Forms. This memorandum pertains to the collection of SSN on DD Form 2990, Ebola Virus Disease Exposure Risk Evaluation (In Theater Use Only) (Attachment 1), and DD Form 2991, Redeployment Health Assessment and Medical Clearance (Attachment 2). These forms are used to collect information (including PII/PHI) from individuals with potential exposure to areas where the Ebola Virus Disease (EBV) is present. Information submitted in the forms is stored in DMSS.

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 forms listed 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 (42 U.S.C. 264). 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 the medical records of deployed personnel.

The system of records notice (SORN) currently applicable to DD 2990, 2991, and DMSS is A0040-5a DASG DoD, Defense Medical Surveillance System (Attachment 3). DMSS is in the process of transferring to DHA ownership, and as a result, a new draft SORN is in development. Because DMSS is a system that collects PII electronically, a Privacy Impact Assessment (PIA) is being drafted by the Program Office for review.

Forms DD 2990 and 2991 are subject to the Paperwork Reduction Act. OMB package 0720-0056 is currently in the process of being renewed. The required 60-day Federal Register Notice was published on March 14, 2018 and subsequently ended on May 14, 2018.

The SSN collected 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, and facilitate contact tracing;
- And 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 of the United States.

In accordance with DoDI 1000.30, continued use of SSNs for form DD 2990 and 2991 must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use Cases applicable include:

Acceptable Use Case 2.c.(8), Computer Matching. It 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." DMSS must use SSNs for operational necessity to effectively interface historic and current data received from the Military Health System's (MHS) hospital/laboratory information system, Composite Health Care System (CHCS).

CHCS, a legacy system, continues to use SSN as a primary identifier. For the Armed Forces Health Surveillance Branch, the SSN is used to inextricably link individuals to data contained within the DoD Serum Repository containing serum specimens dating back to 1985. DMSS masks or removes SSN wherever feasible such as being completely eliminated from the primary application user interface used to process specimens within the DoD Serum Repository.

Acceptable Use Case 2.c.(11), Legacy System Interface. DMSS is expected to continue maintaining SSNs due to the need to interface with other DoD systems that continue to use SSNs as an identifier. To meet AFHSB's mission requirements to provide timely, relevant, actionable, and comprehensive health surveillance information in order to promote, maintain, and enhance the health of military and military-associated populations, AFHSB is required to receive data from current DoD sources that do not contain an alternate form of identification (e.g., Deployment Health Assessments: DD 2795, Pre-Deployment Health Assessment; DD2796, Post-Deployment Health

Assessment; DD 2900, Post-Deployment Health Re-Assessment; and Services' Reportable Medical Events Systems). When available, alternate identification numbers such as DoDID are used in place of SSNs.

If you have any questions regarding DD 2990 or 2991, please do not hesitate to contact me by phone at (301) 681-5870 or by email at mary.a.bauzalawver.mil@mail.mil.

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Attachments:
As Stated