



**DEFENSE HEALTH AGENCY**  
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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 Department of Defense Suicide Event Report (DoDSER), DoD Information Technology Portfolio Repository (DITPR) #13190

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, requiring justification to collect and use the SSN in DoD systems, with respect to DoDSER. DoDSER is a surveillance tool for the collection and analysis of data on cases of suicide behavior, including death by suicide, suicide attempt, and self-harm. The data reported on an annual basis is for the purpose of describing the population that engaged in suicidal behavior and to monitor changes in the frequency of behavior.

The system of records notice (SORN) applicable to DoDSER is EDHA 20 DoD, Department of Defense Suicide Event Report (DoDSER) System (April 15, 2016, 81 FR 22240) (Attachment A). The DoDSER Privacy Impact Assessment (PIA) is currently being updated. Therefore, the executed DoDSER PIA dated October 23, 2013 is included for reference (Attachment B). DoDSER is subject to the Paperwork Reduction Act (PRA). The current version of the OMB control number is 0720-0058 with an expiration date of 08/31/2019 (Attachment C).

In accordance with DoDI 1000.30, continued use of SSNs within DoDSER must be justified by one or more of the Acceptable Uses set forth in DoDI 1000.30, Enclosure 2, Section 2. The Acceptable Uses applicable to DoDSER are Section 2.c.(8), Computer Matching. "Systems, processes, or forms that interact with other Government agencies may require the continued use of the SSN as a primary identifier until such time as the applications to which they are linked move to some other identifier as a primary means for transferring, matching, or checking information." The data collected in DoDSER are merged with data from other existing record systems for the purpose of case verification and data quality assurance. The DoDSER program is working on transitioning to the exclusive use of the electronic data interchange personal identifier to the extent practicable. At this time, case verification for deaths involves linkage to compiled state death records that are identified the SSN.

The discussion below sets forth why SSNs still need to be currently collected in DoDSER under Acceptable Use Case 2.c.(8).

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.

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. EDI-Pis are not, and cannot be used, by non-DoD organizations as an identifier or for their business processes.

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 Information (PII) data is not placed into analytical reports. The program will evaluate potential alternatives to SSNs and examine the costs and business requirements associated with shifting to an alternative.

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