



**DEFENSE HEALTHCARE MANAGEMENT SYSTEMS  
PROGRAM EXECUTIVE OFFICE**  
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**FEB 23 2018**

For: Chief, DHA Privacy  
& Civil Liberties

**MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES AND TRANSPARENCY  
DIVISION**

**SUBJECT: Justification for the Use of Social Security Numbers in MHS GENESIS,  
Department of Defense Information Technology Portfolio Repository  
Identification #16913**

**References:**

- (a) DoD Instruction 1000.30, "Reduction of Social Security Number (SSN) Use Within DoD", August 1, 2012
- (b) DoD Instruction 6040.45, "DoD Health Record Life Cycle Management", CH-1, April 11, 2017
- (c) OMB M-07-16, "Safeguarding Against and Responding to the Breach of Personally Identifiable Information", May 22, 2007

This memorandum outlines the justification for the use of Social Security numbers in MHS GENESIS (DITPR ID: 16913) (system name in DITPR: DEPARTMENT OF DEFENSE (DoD) HEALTHCARE MANAGEMENT SYSTEM MODERNIZATION (DHMSM)), the electronic health record (EHR) deployed by the DHMSM Program Management Office. In addition, this memorandum complies with the requirements set forth in references (a) through (c) with emphasis on reference (a). MHS GENESIS enables the Defense Health Agency (DHA) to: a) plan and conduct clinical care, b) document and store clinical data, c) coordinate and implement continuum of care, and d) manage and exchange medical and dental records with authorized mission partners. These partners include the Department of Veterans Affairs, the Department of Health and Human Services, the Social Security Administration, and TRICARE network of service providers.

The system of records notice (SORN) currently applicable to MHS GENESIS is EDHA07, Military Health Information System, however, a standalone SORN is currently in process with the DHA Privacy and Civil Liberties Office (PCLO). The MHS GENESIS Privacy Impact Assessment, titled MHS\_GENESIS\_DD\_2930\_PIA\_12.20.17\_Final.pdf, is also currently in coordination for signature.

MHS GENESIS is subject to the Paperwork Reduction Act. DHMSM is working with the DHA Information Management Control Office to obtain an Office of Management and Budget control number for the system.

MHS GENESIS uses SSNs when it interfaces with legacy EHR systems and health information exchange (HIE) information systems that do not support the Electronic Data Interchange Personal Identifier for matching a patient's identity and medical records.

The information collection requirement is necessary to provide and document medical care; determine eligibility for benefits and entitlements; adjudicate claims; determine whether a third party is responsible for the cost of MHS provided healthcare and recover that cost; and evaluate fitness for duty and medical concerns which may have resulted from an occupational or environmental hazard. Obtaining this information is essential for DoD's provision of medical care and recovering costs.

In accordance with DoDI 1000.30, continued use of SSNs within MHS GENESIS must be justified by one or more of the Acceptable Use criteria set forth in DoDI 1000.30, Enclosure 2. MHS GENESIS falls under the Acceptable Use 2.c.(11), Legacy System Interface.

MHS GENESIS does not use SSNs as primary identifiers. However, if the system completely eliminates the use of SSN, it may not be able to properly locate a patient's medical records from legacy EHR systems and HIE mission partners' information systems that still use SSNs. If accurate patient data is not received from the legacy systems, there will be negative impacts to patient care and safety because care providers using MHS GENESIS will not receive a complete picture of the patient's medical record.

DHMSM requires a hosting solution for MHS GENESIS and data supporting the EHR solution. The MHS GENESIS contractor will use a centralized data and services architecture, which will rely on one primary data center, as well as an alternate backup data center to provide continuity of care to the MHS GENESIS users.

Within this hosting requirement, the MHS GENESIS contractor will retain direct operational configuration and control of the application and data including managing the hardware from the hypervisor up as well as logical networking. The hosting facility is assessed and authorized for handling sensitive/protected health information in accordance with the DoD Risk Management Framework.

If you have any question regarding this justification memorandum, please contact Mr. Michael Hartzell, DHMSM Information Systems Security Manager at michael.j.hartzell.civ@mail.mil.

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