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HEALTH AFFAIRS**

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TRICARE
MANAGEMENT
ACTIVITY

MEMORANDUM FOR RECORD

SUBJECT: Justification for Requirement of Social Security Number (SSN) on DD Form 2813, "DEPARTMENT OF DEFENSE ACTIVE DUTY/RESERVE/GUARD/CIVILIAN FORCES DENTAL EXAMINATION"

This memorandum is written to satisfy the requirement established in Department of Defense (DoD) Instruction 1000.30, Reduction of Social Security Number (SSN) Use Within DoD (August 1, 2012) (DoDI 1000.30). DoDI 1000.30 requires justification of the collection and use of an individual's SSN on the revised DD Form 2813, "DEPARTMENT OF DEFENSE ACTIVE DUTY/RESERVE/GUARD/CIVILIAN FORCES DENTAL EXAMINATION" (Attachment 1).

DD Form 2813 is used to collect personally identifiable information (PII) from military personnel and civilian DoD employees to record an assessment of an individual's dental health needs for military service and/or deployment outside the United States in support of military operations. This collection of PII assists DoD compliance with the requirements of 10 U.S.C. 1074f. Additional authority for the collection of PII through DD Form 2813 is found in DoD Directives 1404.10, 5101.1, 5136.01, and 6490.02E, and DoD Instruction 6025.19.

PII collected through DD Form 2813 is retained and maintained as required by 10 U.S.C. 1074f in the system of records notice (SORN) for the Defense Medical Surveillance System, A0040-5a DASG DoD (Attachment 2). A Privacy Impact Assessment (PIA) for the Defense Medical Surveillance System is included as Attachment 3. The Paperwork Reduction Act Submission with respect to DD Form 2813 is included as Attachment 4. The proposed revision of this form does not impose additional information collection requirements.

Items 1 through 5 of DD Form 2813 are completed by the individual and the six remaining items are presented by the individual to a dentist for completion and signature. The dentist completing and signing an individual's DD Form 2813 may be a DoD employed or contracted dentist, a dentist who is a member of the Armed Services, or a civilian dentist. The completed and signed DD Form 2813 is then returned to the individual's unit or dental treatment facility. The information in the completed DD Form 2813 is used to record and communicate an individual's dental readiness status. Status information is included in the individual's Individual Medical Readiness records.

Information collected through DD Form 2813 is also used by the Services as a source of dental readiness data in their respective Service-level system of records. The applicable Service-level SORNs are A0040-66b DASG, Health Care and Medical Treatment Record System (Attachment 5); F044 AF SG E, Medical Record System (Attachment 6); and N06150-2, Health Care Record System (Attachment 7)

PII collected from an individual through DD Form 2813 includes the individual's SSN, together with the individual's name, unit, unit address and branch of service. A dentist then completes the examination results and provides his/her name, address, telephone number, State license number, examination data and signature.

DoDI 1000.30, Enclosure 2, Paragraph 2.c.(11), includes "Legacy System Interface" as an acceptable use of the SSN so long as there are plans in place for the migration away from the SSN in the future. The documents and discussion below set forth why the SSN still needs to be collected through DD Form 2813 due to legacy system interfaces and the collection of information through civilian dentists, and details plans that will allow migration away from collecting SSNs on this form in the future.

SSNs are required to be collected on DD Form 2813 because the Service-level systems of records that retain the PII collected through the form currently use SSNs as an identifier. Furthermore, civilian dentists use SSNs to identify patients and patient records in dealing with third parties such as DoD and the Services. In addition, the Defense Manpower Data Center (DMDC) uses the PII, including SSNs, to create and maintain the Contingency Support Roster. The Contingency Support Roster is used to identify deployed individuals and to associate responses from separate DD Forms with a specific individual. Truncating or masking an individual's SSN creates a risk of misidentifying individuals.

Upon receipt of the DD2813, the Services will enter the information into a readiness reporting system and will then either destroy the form or file it in the patient's dental record for safekeeping. There are access controls in place for the electronic systems and physical records are kept in secure areas with access controls, as well. These safeguards will ensure the security of the SSN.

DMDC has implemented a plan under which the use of SSNs as a primary identifier in internal DoD and Service business processes will be phased out. Under that plan, SSNs are being replaced by two new codes or alternative identifiers: the DoD Benefits Number (DBN) and the DoD Identification (ID) Number (DoD ID Number), which is derived from the DoD Electronic Data Interchange-Personal Identifier (EDI-PI), used for machine-to-machine transactions by the DoD. These codes currently exist, but may not be known to individuals and/or certain systems, particularly Service-level systems which may not have been updated to permit use of DBNs, DoD ID Numbers, and/or EDI-PIs in lieu of SSNs. Even at such time as DoD systems do not require use of

SSNs for DoD and Service business processes, civilian healthcare providers will still require an individual's SSN to ensure that dental health records are correctly associated with the individual requesting a civilian dentist to complete the DD Form 2813. In these circumstances, civilian healthcare providers may still require that the DD Form 2813 provided to them for completion includes an individual's SSN as a means for the dentist to verify the individual's identity and locate the individual's dental records.

When the required renewal of DD Form 2813 occurs, a recommendation will be made regarding inclusion of the DoD Benefit Number and/or EDI-PI as a new field on the Form, to be used in lieu of the SSN for DoD and/or Service-level business processes, as appropriate. At that time, a determination may also be made as to whether then existing DoD and Service-level legacy systems handling an individual's dental readiness information are capable of free-standing alternate ID numbers in lieu of SSNs.

If there are any questions, my point of contact is Lt Col Kathleen Gates (703) 681-0039.

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