

## DEFENSE HEALTH AGENCY 115 PURPLE HEART DRIVE DOVER AIR FORCE BASE, DELAWARE 19902

August 2, 2019

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

THROUGH: Defense Health Agency Privacy and Civil Liberties Office

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) in DD Form 2064, Department of Defense Certificate of Death/Armed Forces Medical Examiner Tracking System, DITPR ID #15755

The Department of Defense (DoD) Certificate of Death, DD Form 2064 is an official document issued by the DoD which declares the cause and manner of death, location of death, time of death and other personal information about the deceased. The Armed Forces Medical Examiner System (AFMES) pursuant to DoDI 5154.30 is currently responsible for the issuance and maintenance of federal death certificates in cases subject to the Armed Forces Medical Examiner's authority under Section 1471 of Title 10 and for all cases requiring an overseas death certificate. Users of the DD Form 2064 will be the forensic pathology community (medical examiners) for all ME cases and by credentialed medical providers in MTFs that will certify any deaths not considered medical examiner cases. The Patient Administration Division of the MTF may also help pre-populate the form.

The Armed Forces Medical Examiner Tracking System (AFMETS) is a Government-developed system that provides medical examiners the ability to track and record autopsy information and facilitates issuance of overseas death certificates. It provides medical examiners a tool for managing a decedent case from the time of notification of death to the final release of remains to a mortuary for preparation for interment.

AFMES is currently working to update and transfer the associated AFMETS Privacy Impact Assessment and system of records notice to the Defense Health Agency (DHA). This system of records is currently maintained under the Department of the Army, system of records notice, "Pathology Consultation Record Files," A0040-31a DASG (March 27, 2003, 68 FR 14959). DHA is in the process of updating the DD Form 2064 and adding a new system of records notice that will cover the same records.

Acceptable use 2.c. (8) Computer Matching applies to the DD 2064 due to its interaction with other government agencies, and the requirement of SSNs to be used as a primary identifier. Decedent information is, in part, provided from the Defense Civilian Intelligence Personnel System (DCIPS), A0600-8-1c AHRC DoD (May 03, 2011, 76 FR 24865). The SSN collected in AFMETS is used to affirmatively establish the identity of a decedent and to verify personnel data received from DCIPS that populates the DD Form 2064. Continued use of the SSN is an

operational necessity until such time as Human Resources Command stops using SSNs to track personnel in DCIPS. Safeguards are in place to protect all personally identifiable information maintained within the system, in accordance with the Privacy Act of 1974 and DoD 5411.11-R, "Department of Defense Privacy Program."

The most basic reason for continued use of the SSN is that DD Form 2064 is, for the single most important function, used to "close out" the birth record and eliminate the SSN from circulation. At birth, your birth certificate announces you are "born and alive" and the death certificate announces your death. The DD Form 2064 is used by DoD for the reasons explained in the preceding paragraph. It is used for all military and civilians deaths under AFMES jurisdiction and to certify deaths of the same populations that die in US medical treatment facilities that do not fall under our jurisdiction. Basically, it is the DoD's death certificate for deaths outside the US. The families of the decedents use the DD Form 2064 to claim benefits and close all necessary accounts in the decedent's name both in the military and civilian institutions that need a death certificate to do so. This will include the Social Security Administration getting notified of the death and will "close" the SSN based on the death certificate. Each US state has its own bureau of vital records/statistics that will enter the SSN from the death certificate into their databases in order to close out the records associated with the decedent. Because the institutions using the death certificate with SSN are both military and civilian, the SSN is needed on the death certificate.

For questions related to this memorandum contact Ms. Leslie Middleton at leslie.a.middleton.civ@mail.mil or by telephone at 302-346-8636.

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