DEFENSE HEALTH AGENCY
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Administration & Management (J-1)

May 3, 2022

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

THROUGH: Defense Health Agency Privacy and Civil Liberties Office

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SUBJECT: Justification for the Use of Social Security Numbers (SSNs) in Defense Healthcare Management System Modernization Electronic Health Record (DHMSM EHR), Department of Defense Information Technology Portfolio Repository (DITPR) # 16913, eMASS ID # 1017

The DHMSM EHR system is the core component of the MHS GENESIS system. It provides access to authoritative clinical data sources and is the authoritative source of clinical data to support improved population health, patient safety, and quality of care to maximize medical readiness for the DoD. As the modernization effort continues, the DHMSM EHR system will gradually replace the legacy Electronic Health Record (EHR) systems and become MHS GENESIS. Hereinafter, DHMSM EHR is referred as MHS GENESIS.

MHS GENESIS is an EHR information system that collects, processes, and distributes EHR longitudinally across the Military Health System (MHS), Department of Veterans Affairs (VA), United States Coast Guard (Coast Guard), TRICARE network of service providers, and Federal and State agencies for approximately 9.6 million DoD beneficiaries worldwide.

MHS GENESIS collects, processes, and distributes the following categories of PII, which includes Protected Health Information (PHI) and SSNs. This information is needed for the timely and high-quality delivery of health care services to and the determination and processing of patient benefit information for DoD, VA, Coast Guard, and other beneficiaries, as well as for Defense Health Agency (DHA) authorized clinical trials, medical research, and disease registries.

MHS GENESIS is intended for use by clinicians for the purpose of providing access to healthcare for the patient populations of DoD, VA, Coast Guard, and their beneficiaries. The application of standardized workflows, integrated healthcare delivery, and data standards enables improved electronic exchange of medical and patient data between the DoD and its external partners, including the VA and private sector healthcare providers.

As documented in the Privacy Impact Assessment (PIA), which can be found at https://www.health.mil/Military-Health-Topics/Privacy-and-Civil-Liberties/Privacy-Impact-Assessments/MHS-PIA-List, MHS GENESIS is used to collect and share PHI/PII, including SSNs, for the purpose of providing healthcare and related services to DoD, VA, and Coast Guard beneficiaries and their dependents. Further, the authorities for the system have been specified in historical PIA documentation as well as within the instant submission of the new

system of records notice ("SORN"), "Defense Healthcare Management System Modernization Electronic Health Record ("DHMSM EHR"), EDHA 26." Before being populated in MHS GENESIS, PHI/PII is first obtained from beneficiaries or their dependents through either (1) the treating clinician at the deployed location, who collects PHI/PII directly from the beneficiary or dependent and then enters the PHI/PII into MHS GENESIS, or (2) the beneficiary or dependent, when such person directly enters any PHI/PII in the Patient Portal used to create and/or access that beneficiary's or dependent's EHR.

In accordance with DoDI 1000.30, Enclosure 2, continued use of SSNs within MHS GENESIS is justified by the following.

Acceptable Use Case 2.c.(8), Computer Matching. SSNs are used when MHS GENESIS interfaces with legacy EHR systems and Health Information Exchange (HIE) information systems that do not support the Electronic Data Interchange Personal Identifier (EDIPI), i.e., the DoD ID, for matching a patient's identity and medical records. MHS GENESIS does not use SSN as the primary identifier. 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 mission partners information systems in HIE, which will negatively impacts the timing and quality of delivering patient care, as well as patient safety. MHS Genesis will require SSNs for at least as long as it interfaces with legacy DoD, VA and Coast Guard systems that rely on the SSN as the primary identifier. The system will also require ongoing use of SSNs as a secondary identifier to ensure patients are properly identified and receive appropriate medical care.

Acceptable Use Case 2.c.(12) Operational Necessity. In limited instances where a beneficiary requests the provision of medical services at a Military Treatment Facility (MTF) but cannot adequately prove his or her identity or eligibility, timely provision of the medical services requested by a beneficiary at that MTF requires the beneficiary's SSN to prove identity or eligibility. Were the MTF and/or its personnel to deny a beneficiary services because of an inability or refusal to use the patient's SSN to verify identity or eligibility, the MTF and/or the personnel could be exposed to liability.

For questions related to this memorandum contact please contact Mr. Marc Shelton, the DHMSM Information Systems Security Manager (ISSM), at (843) 218-6614 or marc.d.shelton.civ@mail.mil.

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