

Just the Facts...

Use of Employee Social Security Numbers for Exposure Data Collection

Purpose: This fact sheet is designed to provide documentation necessary to demonstrate authority for DOD and DA safety and health personnel to request government employee disclosure of social security information during exposure data collection and monitoring. Employee (soldier and civilian) personal information is necessary for data entry and retrieval using existing and future data systems such as the Defense Occupational & Environmental Health Readiness System (DOEHRS).

Facts: In 1943, President Franklin Roosevelt signed into law Executive Order 9397. The law was designed to uniquely identify U.S. citizens, and allows the Federal Government to use the Social Security Number (SSN) as the means to identify individual employees. In 1997, in response to inadequate documentation of soldier's exposures to hazardous substances during deployment, President Clinton ordered the creation of a Force Health Protection Program. This program created a life-long medical record that follows soldiers throughout their military careers, and longitudinal occupational exposure records for civilian employees.

The Occupational Safety and Health Administration (OSHA) mandates that employers provide a safe and healthy work place for all employees. In order to accomplish this, safety and health personnel, such as industrial hygienists, perform workplace surveys to determine the nature and magnitude of potentially hazardous exposures and monitor the effectiveness of existing control measures (i.e., ventilation systems, protective clothing) within the workplace. Safety and health personnel enter the survey data to a secure DOD health care exposure database called the DOEHRS. The data can be analyzed by safety and health practitioners for care and treatment of soldiers and civilians. For more information on DOEHRS go to: <http://chppm-www.apgea.army.mil/industrialhygiene/DOEHRS.aspx>

When collecting field survey and exposure data via DOEHRS, safety and health personnel will collect and verify the employee's SSN. This is a benefit to the employee; if there are any complications in the future due to workplace hazards, their exposure profile will be accurate and readily available.

DOEHRS data is protected by controlling access to authorized users with the proper security training and encrypting the data to prevent access from theft. The system is certified by DOD and the Army to be fully compliant with Information Security Standards, including the requirements of the Health Insurance Portability and Accountability Act (HIPAA) of 1996. Also, the Privacy Act of 1974, DoD Directive 5400.7 (a) and (b), and AR 340-21, (The Army Privacy Program) apply to the DOEHRS-IH System.

There are penalties for unauthorized disclosure of privacy information. An individual may file civil suit against the Army for failing to comply with the Privacy Act. The courts may find an individual offender guilty of a misdemeanor and fine that individual offender not more than \$5,000.

Federal employees are required to provide social security numbers to requesting Government officials who have a legitimate mission-related reason for the request (qualified personnel). Federal employees have the right to know what the information will be used for, where they can find it and that the information will be appropriately safeguarded.

Safety and health professionals are advised to inform command management, supervisors, workers and union representatives during entrance briefings and in visit notification announcements.

As a part of entrance briefings and in-visit notification announcements, safety and health professionals are advised to inform command management, supervisors, workers and union representatives of employee's obligation to provide social security number information to qualified personnel.