

2024 Department of Defense Suicide Event Report (DoDSER) System Data Sharing Practices and Acceptable Use Statement

General DODSER Data Sharing Practices

The Psychological Health Center of Excellence (PHCoE) has responsibility for the DoDSER system and its resident data. PHCoE is committed to protecting the privacy of Service Members and to ensuring the safety and appropriate use of protected health information. To that end, PHCoE adheres to the following practices involving sharing DoDSER data:

- 1) PHCoE will supply identified decedent DoDSER data as prescribed by applicable laws and regulations. Also, in coordination with the DHA Privacy and Civil Liberties Office (PLCO) and only with a clear understanding of how the recipient intends to use the identified data, PHCoE will supply identified decedent DoDSER data to requestors who are not otherwise required by law to receive them.
- 2) PHCoE will not distribute identified DoDSER data related to nonfatal events unless such disclosure is expressly mandated by law or regulation. Exceptions to this rule will be considered under the conditions specified in DoDM 6025.18 – *Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs*. The most common exceptions include situations where disclosure:
 - is for the purpose of research only and identifiable data is required to effect data linkages, and the researchers agree to deidentify data (in a manner that cannot be undone) immediately upon completion of data linkage activities;
 - disclosure is to another HIPAA-covered entity or their Business Associates, and the intended use of the identified information conforms to approved purposes under the HIPAA Privacy Rule; or
 - disclosure is to designated public health authority, and the intended use of the data is for an approved public health activity such as surveillance.
- 3) Please note that, while paragraphs 4.4.k.(1)(c)1. through 4.4.k.(1)(c)6. of DODM 6025.18 outline the circumstances in which disclosure to command is permitted under the command exception to the HIPAA Privacy Rule, paragraph 4.4.k.(1)(d) expressly limits the disclosure of protected health information related to mental health services. Because data in the DoDSER system are collected retrospectively, they are lagging indicators of risk and are, therefore, insufficient to meet the notification standards established in either a) DODI 6490.08 – *Command Notification Requirements to Dispel Stigmas in Providing Mental Health Care to Service Members* or b) under the provisions of paragraph 4.4.j. of DODM 6025.18.

Acceptable Use Statement for Identified DoDSER Data

DoDSER data are collected for surveillance purposes. Acceptable use of DoDSER data includes the analysis and reporting of de-identified and aggregated data summaries of fatal and nonfatal events reported to the system. Acceptable use includes the merging of identified data with other records for the purpose of enriching any aggregated and de-identified data reporting.

Recipients of identified DoDSER data will:

- only report or share such information to third parties in an aggregate and/or de-identified manner;
- ensure if they share data with third parties that the third parties also agree to use the information only in accordance with applicable law and policy;
- de-identify data as soon as practicable; and
- will notify PHCoE and the DHA PLCO of any change to intended use of the data initially proposed and seek permission to use data for these purposes through the same formal request procedures established by the PCLO as originally used to obtain DoDSER data.

The presentation/sharing/reporting of DoDSER data/information that associates an identifiable individual with specific DoDSER data elements or that makes discoverable the fact that an identifiable individual has a record in the DoDSER system is absolutely prohibited. The determination that the release of identifiable DoDSER information is allowable for one intended use-case is not a guarantee that the recipient may use the same data for purposes other than the originally stated and approved use.

Report any loss of control, compromise, unauthorized disclosure, unauthorized acquisition, or any similar occurrence of misuse of the DODSER data to your respective Privacy Office via the Defense Privacy Information Management System (DPIMS). License users should report via the following site: <https://dpims.disa.mil/eCase/>. Non-licensed users please use the following site: <https://dpims.disa.mil/eCaseportal>. NOTE: When completing the breach report, please select your Service Component to ensure the appropriate Privacy officials are notified and email a copy of the breach report to Psychological Health Center of Excellence (PHCoE) Program office at the following: usarmy.jblm.medcom-mamc.mbx.dodser-admin@health.mil.