

INSPECTOR GENERAL

U.S. Department of Defense

JUNE 27, 2023



Management Advisory: Reliability of the Defense Enrollment Eligibility **Reporting System Data**





OFFICE OF INSPECTOR GENERAL DEPARTMENT OF DEFENSE

4800 MARK CENTER DRIVE ALEXANDRIA, VIRGINIA 22350-1500

June 27, 2023

MEMORANDUM FOR DIRECTOR OF DEFENSE MANPOWER DATA CENTER

SUBJECT: Management Advisory: Reliability of the Defense Enrollment Eligibility Reporting System Data (Report No. DODIG-2023-089)

The purpose of this management advisory is to provide Defense Manpower Data Center (DMDC) officials with information related to concerns with the reliability of data in the Defense Enrollment Eligibility Reporting System. We determined that beneficiary data for the data fields supporting identity management and benefits eligibility were generally complete. However, inconsistencies in guidance concerning the collection and maintenance of contact data resulted in incomplete and unreliable information. We previously provided a copy of the draft advisory and requested written comments on the recommendations. We considered management's comments when preparing this final advisory. We conducted the work on this advisory with integrity, objectivity, and independence, as required by the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Federal Offices of Inspector General.

This advisory contains two recommendations that are considered unresolved because management's comments did not fully address the recommendations. Therefore, as discussed in the Recommendations, Management Comments, and Our Response section of this advisory, the recommendations will remain open. We will track these recommendations until an agreement is reached on the actions that need to be taken to address the recommendations, and management submits adequate documentation showing that all agreed-upon actions are completed.

This advisory also contains three recommendations that are considered resolved. Therefore, as described in the Recommendations, Management Comments, and Our Response section of this advisory, we will close the recommendations when we receive documentation showing that all agreed-upon actions to implement the recommendations are completed.

DoD Instruction 7650.03 requires that recommendations be resolved promptly. For the unresolved recommendations, please provide us within 30 days your response concerning specific actions in process or alternative corrective actions proposed on the recommendations. For the resolved recommendations, please provide us within 90 days documentation showing you have completed the agreed-upon actions. Please send your documentation as a PDF file to either followup@dodig.mil if unclassified or rfunet@dodig.smil.mil if classified SECRET. Responses must have the actual signature of the authorizing official for your organization.

We appreciate the cooperation and assistance received.	If you have questions, please contact
me at	

FOR THE INSPECTOR GENERAL:

Carol M. A cuma

Carol N. Gorman

Assistant Inspector General for Audit Cyberspace Operations & Acquisition, Contracting, and Sustainment

Background

The DoD established the Defense Enrollment Eligibility Reporting System (DEERS) in 1982 as the authoritative data repository for verifying an individual's identity; affiliation with the DoD; and eligibility for benefits, privileges, and entitlements. The DoD also uses DEERS data to authenticate an individual for physical and system access to DoD facilities and networks.¹ DEERS contains sensitive data, including workforce and medical information from multiple sources for sponsors and their dependents. Sponsors are the primary beneficiary and receive benefits based on their affiliation with the DoD. For the purposes of this report, sponsors include Uniformed Service members whether active duty, retired, or Reserve Component; U.S.-sponsored foreign military personnel; and DoD civilians. Dependents are the sponsor's family members who are entitled to TRICARE and other benefits.² As of May 2021, there were approximately 23.3 million data records in DEERS for current beneficiaries affiliated with the DoD.3

The Defense Manpower Data Center (DMDC), a DoD Field Activity subordinate to the Defense Human Resources Activity within the Office of the Under Secretary of Defense for Personnel and Readiness, is the Program Management Office for DEERS. As the Program Management Office, the DMDC manages technical, acquisition, and functional requirements for the DEERS program. The DMDC is responsible for collecting, maintaining, and securing data, including workforce, pay, entitlement, training, and financial information in DEERS for the DoD.

According to the System of Records Notice, DEERS:

- supports administration of TRICARE benefits for beneficiaries who have provided a personal e-mail address for benefit-related notifications;
- provides contact information for DoD personnel and beneficiaries for the purpose of conducting DoD-authorized surveys;
- supports Federal agencies by notifying Service members and dependents of payments or other benefits for which they are eligible; and
- supports the American Red Cross by providing emergency notification and assistance to members of the Uniformed Services, retirees, family members, and survivors.4

¹ DoD Instruction 1341.02, "Defense Enrollment Eligibility Reporting System (DEERS) Program and Procedures," August 18, 2016.

² TRICARE is the health care program for Uniformed Service members, retirees, and their families.

³ DEERS also contains about 57.7 million historical records. In total, there are about 80 million records in DEERS. Throughout this report, we refer to sponsors and their dependents as beneficiaries.

System of Records Notice DMDC 02 DoD, "Defense Enrollment Eligibility Reporting Systems (DEERS)," May 31, 2022. As required by the Privacy Act, the DoD publishes a System of Records Notice in the Federal Register that identifies the purpose for which information about an individual is collected, from whom and what type of information is collected, and how the information is shared.

DEERS collects data from the DoD, other Federal personnel and finance systems, and the Real-Time Automated Personnel Identification System (RAPIDS) stations used for enrollment or record updates.⁵ RAPIDS sites at military installations link with DEERS to update DEERS data.

Guidance for Updating DEERS Data Fields

Officials at RAPIDS sites use data from DD Form 1172-2, "Application for Identification Card/DEERS Enrollment," to enroll eligible individuals or update records in DEERS. DD Form 1172-2, "Instructions for Completion of DD Form 1172-2" (Enrollment Instructions), provides guidance for users entering data into fields, such as a maximum length of some data fields, valid characters for input, and whether a data field must be populated. The Enrollment Instructions address requirements for 73 data fields needed to enroll or update records in DEERS. For example, the Enrollment Instructions state that the Social Security Number (SSN) field should contain the sponsor's or employee's SSN or Electronic Data Interchange Personal Identifier (EDIPI), but also allows other authorized numbers such as an Individual Taxpayer Identification Number or Foreign National Identification Number if neither the SSN nor the EDIPI is available during enrollment.⁶

DEERS Data Fields Reviewed

We obtained DEERS data as of May 2021 and reviewed six data fields—EDIPI, Name (first and last name), Date of Birth (DOB), SSN, E-Mail Address, and Telephone Number. Four of the six data fields—EDIPI, Name, DOB, and SSN—are data fields that, according to the Enrollment Instructions, users must populate. This information is critical for establishing identification and eligibility for benefits and entitlements of all individuals registered in DEERS. For these four data fields, we determined the reliability of the data by testing the completeness of the data and whether the data included in the fields conformed to DD Form 1172-2 requirements. Our review of the SSN data field was limited to sponsor records because the SSN field is not required for dependents. For example, a foreign citizen married to a U.S. Service member may not have an SSN but is still entitled to benefits. We considered the reasonableness of information in the DOB field by identifying dates before 1923, indicating the individual was more than 100 years old. The remaining two data fields— E-Mail Address and Telephone Number—are optional according to the Enrollment Instructions. We assessed the completeness of sponsors' e-mail addresses and telephone numbers because the information enables the DoD to contact beneficiaries. The table identifies the data fields and universe of records that we reviewed, as well as the applicable data input requirements associated with each data field as defined in the Enrollment Instructions.

⁵ RAPIDS stations issue Common Access Cards, which are the standard identification for Uniformed Service members, Selected Reserve, DoD civilian employees, and eligible contractor personnel. They are also the principal card used to enable physical access to buildings and controlled spaces, and provide access to DoD computer networks and systems.

The EDIPI is also known as the DoD Identification number. "Department of Defense Public Key Infrastructure Functional Interface Specification," Version 3.0, September 16, 2010 (Updated March 1, 2019) includes requirements for length and composition of the EDIPI field.

Table. DEERS Data Fields Reviewed, Universe of Records, and Enrollment Input Requirements

Data Field	Universe	Requirements
EDIPI	All 23,281,943 records	May include a 10-digit numberMay include other authorized numbersCannot be blank
Name	All 23,281,943 records	 Cannot exceed a maximum length of 51 characters Cannot contain special characters or punctuation Cannot be blank
DOB	All 23,281,943 records	 Must be nine characters in length (YYYYMMMDD) Cannot be blank
SSN	Sponsor only – 10,911,993 records	 Must include a 9-digit number Cannot include alphanumeric characters Cannot be blank (Sponsor only)
E-Mail Address	Sponsor only – 10,911,993 records	Can be left blank*
Telephone Number	Sponsor only – 10,911,993 records	 Cannot contain punctuation to separate area code, prefix, and basic number Can be left blank*

^{*}Although the Enrollment Instructions allow these fields to be blank, DoD Instruction 1341.02 requires DEERS to maintain contact information for all DoD beneficiaries and individuals requiring a DoD Common Access Card. DoD Instruction 1341.02 identifies address and e-mail as two examples of contact information; however, telephone number is another type of contact information not specifically identified in the instruction.

Source: The DoD OIG.

DEERS Identity Data Fields Reviewed Were Generally Complete, but Contact Data Fields Were Generally Incomplete

The SSN data field included data in all beneficiary records while the remaining three DEERS identity data fields we reviewed—EDIPI, Name, and DOB—included incomplete data in less than 1 percent of all beneficiary records. However, DEERS contact data fields—E-Mail Address and Telephone Number—were generally incomplete, containing incomplete data in 64 percent and 16 percent, respectively, of the records we reviewed. Furthermore, the DOB data field included inaccurate or potentially inaccurate data in less than 1 percent of the records we reviewed.

Identity Data Fields Reviewed Were Generally Complete

Three of the four identity data fields we reviewed—EDIPI, Name, and DOB—were generally complete, containing incomplete data in less than 1 percent of all beneficiary records, while the SSN data field did not include incomplete data. Specifically, the:

- EDIPI field included data in all but 94,524 of 23,281,943 beneficiary records (0.41 percent);
- Name field included data in the first name field for all but 95,376 of 23,281,943 beneficiary records (0.41 percent), and data in the last name field for all but 94,522 of 23,281,943 beneficiary records (0.41 percent); and
- DOB field included data in all but 103,035 of 23,281,943 beneficiary records (0.44 percent).7

Furthermore, we identified 22,633 of 23,281,943 inaccurate or potentially inaccurate beneficiary records (0.10 percent) with a DOB before 1923, including 399 records with a DOB between 1900 and 1905 and 142 records with a DOB before 1900. Although DMDC officials were aware of inaccurate or potentially inaccurate dates, they stated that it was not cost effective to correct them. They also stated that DoD Components were responsible for working with individuals to correct inaccurate records.

Although DEERS includes controls to reject most records that contain incomplete or invalid data, the EDIPI, Name, and DOB data fields were incomplete or contained inaccurate or potentially inaccurate information because the DMDC did not configure DEERS to reject records or not accept an updated record from a source of entry that did not include data that met requirements defined in the Enrollment Instructions.

We identified that 94,518 of 23,281,943 beneficiary records (0.41 percent) did not include information in the EDIPI, Name, and DOB fields for each beneficiary record, indicating a common error for this subset of records. We provided the incomplete records that we identified to the DMDC for further review to determine the cause of the errors.

Without complete and accurate information in the identity data fields, there could be a delay in eligible beneficiaries receiving benefits, which could cause administrative and financial burdens for beneficiaries and the DoD. For example, DMDC officials stated that incomplete or inaccurate information resulted in beneficiaries not receiving pharmacy benefits in a timely manner and incurring out-of-pocket costs for expensive medications. The DMDC must coordinate with DoD Components to ensure complete and accurate identity data to support timely delivery of benefits and other entitlements. By implementing automated controls that enforce data input requirements, DEERS data will be more reliable. Therefore, we recommend that the DMDC Director, in coordination with DoD Components, take steps to correct records with incomplete or inaccurate data in the EDIPI, Name, and DOB fields identified in this advisory. We also recommend that the DMDC Director implement additional automated system input controls to reject records that do not meet the requirements in the Enrollment Instructions established by the DMDC.

Contact Data Fields Reviewed Were Generally Incomplete

The two contact data fields we reviewed—E-Mail Address and Telephone Number—were generally incomplete. Specifically, the:

- E-Mail Address field included incomplete or missing data for 7,017,506 of 10,911,993 sponsor beneficiary records (64.31 percent), and
- Telephone Number field included incomplete or missing data for 1,795,038 of 10,911,993 sponsor beneficiary records (16.45 percent).

The E-Mail Address and Telephone Number data fields were incomplete because neither the Enrollment Instructions nor the DMDC require users to populate these data fields.

Although the Enrollment Instructions do not require beneficiaries to populate the E-Mail Address and Telephone Number data fields, DoD Instruction 1341.02 requires DEERS to maintain contact information for all DoD beneficiaries and individuals requiring a DoD Common Access Card. DoD Instruction 1341.02 identifies two examples of contact information—address and e-mail. While not listed as an example in the Instruction, a telephone number is another form of contact information. DMDC officials stated that they did not rely on the data in the contact fields to correspond with beneficiaries. However, this type of information is particularly important in the medical community as a growing number of agencies rely on e-mail messages and telephone calls to notify beneficiaries. For example, DMDC officials stated that the medical community uses the contact information in DEERS to notify patients of an upcoming need for preventive cancer screenings.

To illustrate the importance of reliable contact information, DMDC officials stated that, under limited circumstances in the past, the DMDC sent correspondence to beneficiaries' e-mail. This practice reduced the DMDC's annual budget for mailing correspondence by 40 percent,

from \$338,850 in FY 2017 to \$202,486 in FY 2020. In addition, the DoD could use telephone numbers to access records and notify beneficiaries during emergencies.

Without complete and accurate contact information in the E-Mail Address and Telephone Number data fields in DEERS, DoD Components have a limited ability to effectively administer surveys reliant on e-mail addresses and promptly notify beneficiaries through e-mail correspondence or by telephone. In addition, incomplete records may result in delayed

Red Cross notifications to family members during emergencies. Therefore, we recommend that the DMDC Director assess which fields in DEERS users must populate to support DoD mission requirements. Based on the results of

Incomplete records may result in delayed Red Cross notifications to family members during emergencies.

the assessment, we recommend that the DMDC Director update DD Form 1172-2 "Instructions for Completion of DD Form 1172-2," with the determination of required fields. Furthermore, we recommend that the DMDC Director implement automated system input controls to prevent entries from processing unless users populate required fields in accordance with updated requirements.

Conclusion

Complete and accurate data is critical to the DoD for verifying an individual's identity and affiliation with the DoD; confirming eligibility for benefits, privileges, and entitlements; and authenticating an individual's physical and system access to DoD facilities and networks. The DoD also uses data in DEERS to administer DoD-wide surveys, support Federal agencies with benefit notifications, and help the Red Cross make emergency notifications. Our results demonstrate that there are opportunities for the DMDC, in coordination with DoD Components, to improve the reliability of DEERS data by correcting known errors, assessing which fields in DEERS should be required, updating guidance based on the determination of required fields, and implementing automated system input controls that enforce the data requirements. By applying these changes to DEERS, the DMDC can improve the reliability of DEERS data, ensure timely communication with beneficiaries, and realize cost savings due to decreased correspondence sent to physical mailing addresses.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Defense Manpower Data Center Director, in coordination with **DoD Components:**

a. Correct the incomplete and inaccurate EDIPI, Name, and DOB fields identified in this management advisory.

Defense Manpower Data Center Comments

The Defense Human Resources Activity Director, responding for the DMDC Director, partially agreed, stating that the DMDC would correct records in the DEERS database without a DoD EDIPI. However, the Director disagreed with correcting records with incomplete names and DOBs. The Director stated that without reliable and authoritative data as well as the individuals' consent, the DMDC could not change records.

Our Response

Although the Director partially agreed with the recommendation, the comments do not address all the specifics of the recommendation. Therefore, the recommendation is unresolved. We agree that the DMDC cannot change records, but that does not prevent the DMDC from coordinating with DoD Components to correct incomplete or inaccurate records. We request that, within 30 days, the Director provide additional comments in response to the final management advisory that describes the DMDC's planned actions to coordinate with DoD Components to correct incomplete and inaccurate records.

b. Implement additional automated system input controls and reject records that do not meet the requirements in DD Form 1172-2, "Instructions for Completion of DD Form 1172-2," established by the Defense Manpower Data Center.

Defense Manpower Data Center Comments

The Defense Human Resources Activity Director, responding for the DMDC Director, agreed, stating that automated controls have been in place for years to ensure that required fields, such as name and DOB, are included in the DEERS database as part of the DoD identification card issuance process. The Director stated that the automated controls checked for required data elements regardless of how a person was added to the DEERS database.

Our Response

Although the Director agreed with the recommendation, the comments do not address the specifics of the recommendation; therefore, the recommendation is unresolved. As previously identified in the advisory, the DEERS database contained incomplete data in required fields,

such as 103,035 beneficiary records without data in the DOB field. If automated controls were in place and operating effectively, those records should not have been processed with the missing information. We request that within 30 days the Director provide additional comments in response to the final management advisory, identifying specific additional automated system input controls for all required fields that would reject incomplete records or records that do not meet DD Form 1172-2 requirements.

Recommendation 2

We recommend that the Defense Manpower Data Center Director:

a. Assess which fields in the Defense Enrollment Eligibility Reporting System users must populate to support DoD mission requirements.

Defense Manpower Data Center Comments

The Defense Human Resources Activity Director, responding for the DMDC Director, agreed, stating that the DMDC would assess DEERS data fields required to support DoD mission requirements.

Our Response

Comments from the Director addressed the specifics of the recommendation; therefore, the recommendation is resolved but open. We will close the recommendation once the DMDC completes the assessment and provides a copy of the results.

b. Based on the assessment completed for Recommendation 2a, update DD Form 1172-2, "Instructions for Completion of DD Form 1172-2," with the determination of required fields.

Defense Manpower Data Center Comments

The Defense Human Resources Activity Director, responding for the DMDC Director, agreed, stating that the DMDC would update DD Form 1172-2 and its instructions based on the results of the assessment.

Our Response

Comments from the Director addressed the specifics of the recommendation; therefore, the recommendation is resolved but open. We will close the recommendation once the DMDC provides the updated DD Form 1172-2 and associated instructions, and we verify that the updates align with the assessment results.

c. Implement automated system input controls to prevent entries from processing unless users populate required fields in accordance with updated requirements.

Defense Manpower Data Center Comments

The Defense Human Resources Activity Director, responding for the DMDC Director, agreed, stating that the DMDC would assess the implementation of automated controls for fields that the DMDC determined were necessary to support DoD mission requirements. However, the Director stated that DoD Instruction 1341.02, "Defense Enrollment Eligibility Reporting System (DEERS) Program and Procedures," requires the DMDC to maintain contact information, such as address and e-mail address, but does not specifically require the DMDC to collect and maintain e-mail addresses and telephone numbers. Instead, the Director stated that the Instruction listed e-mail address as only one example of contact information. Furthermore, the Director stated that the DMDC was appropriately exercising its administrative discretion to allow the e-mail address and telephone number fields to remain blank based on expressed privacy limitations.

Our Response

Comments from the Director addressed the specifics of the recommendation; therefore, the recommendation is resolved but open. We will close the recommendation once the DMDC provides the assessment results and documentation, such as configuration settings, that support the implementation of automated controls identified as a result of the assessment. Specific to the Director's comment on DoD Instruction 1341.02, "Defense Enrollment Eligibility Reporting System (DEERS) Program and Procedures," the Instruction states DEERS will "maintain, store, use, and share contact information, such as address and e-mail, for notifications to Uniformed Service members, their dependents, and other eligible individuals." To reflect the exact wording in the instruction, we revised the advisory. While not listed as an example in the Instruction, a telephone number is a form of contact information.

Management Comments

Defense Manpower Data Center



HEADQUARTERS

DEFENSE HUMAN RESOURCES ACTIVITY
4800 MARK CENTER DRIVE, SUITE 06J25-01
ALEXANDRIA, VA 22350-4000

MEMORANDUM FOR INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE

SUBJECT: Response to Draft Department of Defense Inspector General, "Management Advisory: Reliability of the Defense Enrollment Eligibility Reporting System Data"

Reference: Department of Defense Instruction (DoDI) 1341.02, "Defense Enrollment Eligibility Reporting System (DEERS) Program and Procedures"

Thank you for the opportunity to review the draft, "Management Advisory: Reliability of the Defense Enrollment Eligibility Reporting System Data." I have noted that more than 99 percent of the Defense Enrollment Eligibility Reporting System (DEERS) identity data was found to be accurate and complete, the result of many data quality efforts within the Defense Manpower Data Center (DMDC). I partially concur with the draft recommendations. Responses are provided in the attached document.

My point of contact is

SORRENTO.MICH AEL.V.

Jeffrey R. Register Director

Attachment: As stated

Defense Manpower Data Center (cont'd)

Response to DOD IG Report No. D2021-D000CX-0146.000 "Management Advisory: Reliability of the Defense Enrollment Eligibility Reporting System Data"

OIG Recommendation 1. a. Correct the incomplete and inaccurate EDIPI, Name, and DOB fields identified in this management advisory.

DMDC Response: DMDC partially concurs with this recommendation. DMDC concurs to correct any records in the DEERS database that lack a Department of Defense (DoD) Electronic Data Interchange Personal Identifier. However, I do not concur with the recommendation that DMDC correct incomplete names and dates-of-birth. As explained in the informal review, DMDC has no source for this information and no reasonable means to contact the individuals. Without reliable and authoritative data, including the individual's confirmation and consent, DMDC cannot alter these records.

OIG Recommendation 1. b. Implement additional automated system input controls and reject records that do not meet the requirements in DD Form 1172-2, "Instructions for Completion of DD Form 1172-2," established by the Defense Manpower Data Center.

DMDC Response: DMDC concurs with this recommendation. Automated controls to ensure that fields required in the DEERS database are populated as part of DoD identification card issuance have been included in DMDC applications for many years. Specifically, name and date of birth are considered required data elements to add a person to DEERS, whether it is done manually for family members or in an automated file exchange, as is true with the various personnel systems. The Electronic Data Identity Person Identifier (EDIPI) is added by the DMDC system when a new person record is added to the database, regardless of its source.

OIG Recommendation 2.a. Assess which fields in the Defense Enrollment Eligibility Reporting System users must populate to support DoD-mission requirements.

DMDC Response: DMDC concurs to assess the DEERS data fields needed to support DoD mission requirements.

OIG Recommendation 2. b. Based on the assessment completed for Recommendation 2a, update DD Form 1172-2 "Instructions for Completion of DD Form 1172-2," with the determination of required fields.

DMDC Response: DMDC concurs with the update of DD Form 1172-2 and its instructions.

OIG Recommendation 2.c. Implement automated system input controls to prevent entries from processing unless users populate required fields in accordance with updated requirements.

Defense Manpower Data Center (cont'd)



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