



# Identity Management Fact Sheet

Updated: October 1, 2021

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## Identity Trait Changes

This fact sheet provides guidance to the field on the requirements for person identity trait changes within the Master Person Index (MPI).

Updates to identity traits can only be made in the event that the information is found to be incorrect or due to a legal change. A person's legal and documented identity traits need to be captured to enable accurate identification. Identity trait updates can be divided into two major categories:

- 1. Administrative Corrections:** Corrections to typographical errors or misspellings in the Name, Social Security Number (SSN), Birth Sex, or Date of Birth (DOB) fields do not require processing by the Healthcare Identity Management (HC IdM) Team and should be corrected at the facility or application level. Once proper verification has been obtained with the accurate identity trait data, the correction can be made at the site. Per VHA Directive 1907.01, VHA Health Information Management and Health Records, "Administrative correction is the documentation by administrative personnel with the authority to correct information previously captured by or in error." Please refer to VHA Directive 1906, Data Quality Requirements for Healthcare Identity Management and Master Person Index Functions for appropriate identity trait data entry requirements.

Please confirm the Multiple Birth Indicator (MBI) value is accurate before making an administrative correction to the SSN field as persons who are part of a multiple birth and received their SSN cards prior to June 25, 2011 may have similar SSNs in addition to other traits being similar or the same (i.e., last name, DOB, Mother's Maiden Name).

If the correct data has been verified and updated in the local VistA system or application and it reverts back to the incorrect data, then the local MPI Point of Contact (POC) will need to enter a Person Verification Task in the Identity Management Toolkit for the HC IdM Team to assist in applying the update. The MPI POC will need to attach the verification documentation for the correction into the Task. **Additional documentation may also be requested when necessary.**

### Supporting Legal Documentation for a Correction

When making an administrative correction request, the individual must provide at least **one** of the following un-expired, Primary Identification documents that displays the trait being corrected.

If secondary Identification is provided, at least **one** of the un-expired Primary Identification(s) must still be provided.

Primary Identification	Secondary Identification
State-Issued Driver's License with current name, photo and DOB	Birth Certificate
Passport with current name, photo and DOB	Social Security Card
Federal, State, or Local Government-issued photo ID containing current name and DOB	

2. **Record Amendments:** Legal changes to a person's Name, SSN or Birth Sex are considered record amendments and require coordination between the facility's MPI POC, Privacy Officer (PO), and the HC IdM Team. Once an individual or personal representative makes a written amendment request, the MPI POC is responsible for providing the appropriate official supporting documentation to HC IdM for processing via a Person Verification Task in the Identity Management Toolkit. Appropriate documentation, as identified in the guidelines below, is always required for changes that are not considered corrections but instead are legal changes to identity information. **Additional documentation may also be requested when necessary.** (Please refer to the VHA Information Access and Privacy Office's *Practice Brief: Request for Amendment of Record under Privacy Law* for further information on processing record amendment requests.)

### **Record Amendments: Name Changes & Removals**

Identity data, such as a person's Name, is a key component of the official MPI record. Therefore, it is required that the individual's current, full legal name, including a full middle name, if applicable, is entered into the record. Retaining the current, full legal name on the MPI record serves to protect the person's privacy, security, and safety by helping to ensure that correct record selections are made, especially among persons with similar identity traits. **Name components are First Name, Middle Name, Last Name and Suffix.**

Nicknames or ambiguous information are not to be used in the Name field. A middle initial should only be used when it reflects the first letter of the person's given middle name.

#### **Supporting Legal Documentation for Removal of a Name Component**

An amendment request to completely remove any name component or change any full name component to an initial requires that the individual submit the request in writing along with **one** form of un-expired Primary Identification and **one** form of Secondary Identification that displays the current name. All identity traits must match on the documentation provided.

Primary Identification	Secondary Identification
State-Issued Driver's License with new name, photo and DOB	Social Security Card or letter from SSA
Passport with new name, photo and DOB	Court Order for a Name Change
Federal, State, or Local Government-issued photo ID containing new name and DOB	Certificate of Naturalization that includes an Official Name Change

### Supporting Legal Documentation for a Name Change

An amendment request to change a name requires that the individual submit the request in writing along with **an** un-expired government issued photo ID with DOB that displays the requested name.

Identification
State-Issued Driver's License with new name, photo and DOB
Passport with new name, photo and DOB
Federal, State, or Local Government-issued photo ID containing new name and DOB

*NOTE: Marriage licenses or certificates are not sufficient documents for a name change, as not all people who apply for a marriage license or marry actually change their name.*

### **Record Amendments: Social Security Number (SSN) Changes**

The person's current official SSN issued by the Social Security Administration (SSA) should be entered into the record. Fictitious SSNs are not to be created, and no other numbers may be entered in this field including prison-issued numbers or Canadian SSNs. If a valid SSN is not known or the person refuses to provide a SSN, then a "P" must be entered into the field for the calculation of a pseudo SSN. An amendment request to completely remove a previously entered valid SSN will generally be denied based on the fact that the SSN is accurate, complete, relevant and timely per the Privacy Act of 1974 [5 U.S.C. §552a (d)] [38 C.F.R. 1.579] record amendment regulations.

If the person has a Department of Defense (DoD) issued Temporary ID Number (TIN) or Foreign ID Number (FIN) rather than a SSN, a pseudo SSN will need to be entered into the SSN field as noted above in order to establish the record. A TIN is used for individuals (e.g., babies) who do not have or have not provided a SSN to DoD. It is used for military dependents only. A FIN is used for foreign military and foreign nationals.

If the person has an Individual Taxpayer Identification Number (ITIN) rather than an SSN, a pseudo SSN will need to be entered in the SSN field, and the ITIN entered in the ITIN field. An ITIN is a tax processing number issued by the Internal Revenue Service. The IRS issues ITINs to individuals who are required to have a U.S. taxpayer identification number but who do not have, and are not eligible to obtain, a Social Security number (SSN) from the Social Security Administration (SSA).

### Supporting Legal Documentation for an SSN Change

An amendment request to change the SSN requires that the individual submit the request in writing along with **one** form of un-expired Primary Identification and **one** form of Secondary Identification that displays the current SSN. The Primary Identification verifies the person's identity and the Secondary Identification verifies the updated SSN.

Primary Identification	Secondary Identification
State-Issued Driver's License with current name, photo and DOB	Social Security Card
Passport with current name, photo and DOB	Letter from SSA with updated SSN
Federal, State, or Local Government-issued photo ID containing current name and DOB	

### **Record Amendments: Birth Sex Changes**

The documented Birth Sex in the electronic health record (Computerized Patient Record System [CPRS], MPI, and VistA) should be consistent with the patient's original birth certificate. This allows for automatic Clinical Reminders, lab results, medication dosages, etc. to provide correct values within CPRS and provide optimal care for all Veterans.

In order to alleviate the need for changing the Birth Sex from its original value on patient records, a new field has been added to VistA and the MPI called Self-Identified Gender Identity (SIGI). This field is intended to signify the Veteran's gender preference for use by VA staff to determine the appropriate way to communicate with the Veteran. This field is available for updating in VistA and will display within MPI and many other VA applications in time. The SIGI field may be set as desired by the Veteran, and requires no documentation for updates.

*NOTE: If the patient is requesting their changed Birth Sex be restored to the birth sex on their original birth certificate and a previous Toolkit Request was submitted to HC IdM, with appropriate documentation, no additional supporting identification is needed. The only supporting documentation needed is the patient's written request to have this field reflect the sex on their original birth certificate, which must be submitted to HC IdM as a Toolkit Person Verification Task.*

#### **Supporting Legal Documentation for a Birth Sex Change**

Despite the medical implications, some Veterans will want to change their Birth Sex field to reflect their identity and this is the Veteran's right. Surgery is not a prerequisite for amendment of Birth Sex. A Veteran's request for amendment to Birth Sex in the record is considered a Privacy Act "amendment request." An amendment request to change the Birth Sex requires that the individual submit the request in writing along with **one** form of un-expired Primary Identification and **one** form of Secondary Identification that displays the current Birth Sex. The Primary Identification verifies the person's identity and the Secondary Identification verifies the updated Birth Sex.

Primary Identification	Secondary Identification
State-Issued Driver's License with current name, photo and DOB	Amended Birth Certificate
Passport with current name, photo and DOB	Court Order for Birth Sex Change
Federal, State, or Local Government-issued photo ID containing current name and DOB	Signed Licensed Physician's Statement on Office Letterhead (see requirements below)*

\*An original statement from a licensed physician must include ALL of the following information:

- Physician's full name
- Medical license or certificate number
- Issuing state of medical license/certificate
- Address and telephone number of the physician
- Language stating that he/she has treated the person or reviewed and evaluated the medical history of the applicant. He/she also has a doctor/patient relationship with the applicant which is evident in having one or more clinical encounters between doctor and patient.
- Language stating that the patient has had appropriate clinical treatment for Birth Sex transition to the new Birth Sex (specifying male or female).
- Language stating "I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct."

### **References**

VHA Directive 1906, [Data Quality Requirements for Healthcare Identity Management and Master Person Index Functions](#)

VHA Directive 1605.01, [Privacy and Release of Information](#)

VHA Directive 1907.01, [VHA Health Information Management and Health Records](#)

VHA Directive 1907.09, [Identity Authentication for Health Care Services](#)

VHA Directive 1341(2), [Providing Health Care for Transgender and Intersex Veterans](#)

VHA Information Access and Privacy Office's Practice Brief: Request for Amendment of Record Under Privacy Law

### **Rescissions**

November 2016

September 2016

May 2018

July 2018

### **Contact Information:**

Contact the HC IdM Team via the Identity Management Toolkit, or if you do not have access to the Toolkit please contact your site's MPI POC for assistance. A listing of the MPI POCs can be found at: [Master Person Index Points of Contact List](#).