

Social Security numbers (SSN) may **NOT** be collected unless it is absolutely necessary (e.g., a statutory requirement). If you believe your collection must collect SSNs, you must provide the rationale for using the SSN as a data element. Please make sure to list and explain any public law, U.S. Code, Executive Order, or statute that mandates or authorizes the use of the SSN. Please include the following information:

- Why do you need to use the SSN?
- What will happen if you cannot use the SSN as a data element?
- Explain alternative data elements considered and why you do not consider them suitable replacements for the SSN.
- What are the costs associated with alternatives?

Response: This information collection has the Social Security-derived HICN as one of the collected elements. Per §205(c)(2)(B)(i), Social Security numbers are assigned to “any individual who is...[a] recipient of benefits under any program financed in whole or in part from the Federal funds...” As Medicare is a Federal program financed by Federal funds, the HICN is the number assigned by Social Security as the primary identifier when a beneficiary obtains Medicare. This process establishes authority for CMS to collect the HICN and use it as the primary identifier. If CMS does not use the HICN as a data element, neither CMS nor beneficiaries will have access to the beneficiaries’ Medicare eligibility records provided by Social Security. CMS has not considered other data elements as none prove sufficiently accurate for the maintenance and retrieval of beneficiary records. Establishing an alternative to the HICN would require re-evaluation and restructuring of many computer systems already in place. The resulting expense involved would be prohibitive.