

TERMS OF CLEARANCE: Pursuant to OMB Memorandum dated May 22, 2007 (M-07-16) and the Identity Theft Task Force, steps should be taken to reduce the risks of data breach incidents of personally identifiable information.

This Paperwork Reduction Act collection requests the Social Security Number (SSN) of individual beneficiaries. OMB is approving this information collection for 18 months to allow CMS to gather information concerning the use and need of individual SSNs. Upon resubmission of the information collection to OMB, please provide a written explanation of the following:

1. Authority for collecting the SSN (e.g. statutory requirement or other legal requirement). *The SSN is collected by SSA not CMS as they are the organization completing the form. In order to be entitled to Supplementary Medical Insurance (Part B) **only**, an individual cannot be eligible or entitled to premium free Part A because of their own work or as an auxiliary or survivor on the SSN of an insured individual (Section 1836 of the Social Security Act, 42 CFR 407.10). SSA must be able to determine if the applicant is entitled to free Part A by checking the individual's own earning history record or the record of a spouse or parent to verify the insured status for free Part A. Since ALL SSA earnings records are SSN based we need the applicants SSN to determine eligibility to this benefit. The CMS-4040 requests the SSN in question 1(d). Additionally, Section 1840(d) (1) of the Social Security Act states that if an individual (or the spouse of that individual) is receiving an annuity from OPM, the premiums for the individual or their spouse shall be deducted from the individuals annuity check. The spouse's SSN is needed to help identify the correct OPM annuity for premium deductions.*
2. Explanation for the use of the SSN on the form (e.g. identity verification, etc.) *See above, verification of eligibility using the SSA earnings system which is solely SSN based and as an alternative method of identifying a Civil Service Annuity for premium deduction purposes.*

3. Alternative method(s) (other than the use of a SSN) for verifying the identity of an individual for the purposes of carrying out the information collection requirement. *There are no alternative methods of verifying the information needed to establish entitlement and in the case of the premium deduction, the SSN is the alternative method.*
4. The cost and systems redesign that would be required to remove the use of the SSN and implement the alternate method(s) of verifying individual identities. This analysis should estimate costs to the program each year over 5 years. *There are no alternative methods.*