

**Additional Information for Inpatient Rehabilitation Facility
Patient Assessment Instrument (IRF-PAI) data and
Supporting Regulations in 42 CFR 412 Subpart P**

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?

CMS is authorized to collect information, including the social security number, under Section 1886(j)(2)(D) of the Social Security Act. Medicare and Medicaid participating IRFs are required to establish a database of patient assessment information (IRF-PAI), and to electronically transmit this information to the Centers for Medicare & Medicaid Services (CMS) for payment purposes. The social security number is used to link the IRF-PAI to the HICN on the claim and to link multiple IRF-PAIs' for the same beneficiary to ensure proper payment under the Inpatient Rehabilitation Prospective Payment System.

- What will happen if you cannot use the SSN as a data element?

We will be unable to link the IRF-PAI to the claim to ensure proper payment.

- Explain alternative data elements considered and why you do not consider them suitable replacements for the SSN.

As part of the ongoing development and implementation of the IRF PPS, we are looking at alternative data elements suitable to replace the SSN. A suitable replacement has not been identified at this time.

- What are the costs associated with alternatives?

The cost is unknown at this time.