

Date: October 6, 2009

Note to: Bonnie Harkless, OSORA

Subject: (OMB Question) 0938-0080: Application for Hospital Insurance Benefits Medicare for Individuals with End Stage Renal Disease and Supporting Regulations in 42 CFR 406.7 and 406.13OMB Passback -- 0938-0080 ESRD Collection (CMS-43)

Below is our response to OMB.

1. Authority for collection of the SSN (statutory requirement or other legal requirement).

Under §205 of the Social Security Act (the Act), the Commissioner of the Social Security Administration (SSA) shall establish and maintain records of the amount of wages paid to each individual and the amounts of self-employment income. These earnings determine an individual's (and/or his/her dependent's or survivor's) eligibility for and the amount of Social Security benefits and Medicare. In order to accomplish the aforementioned task, the Commissioner of SSA shall assign SSNs to all individuals; including applicants for or recipients of benefits under any federally funded program (e.g. Social Security, Supplemental Security Income benefits, and Medicare), aliens who are lawfully present in the United States, and children.

2. Explanation for the use of SSN on the form (identity verification, etc.)

The Social Security Administration uses the SSN as the record identifier for applicants for or recipients of benefits under federally funded programs.

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.

Since the earnings records are SSN based, there isn't a current alternative identifier that can be used by SSA. Because CMS does not obtain or process applications for such benefits, it cannot assign an alternative identifier at the time the application for Medicare is filed.

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.

We cannot at this time provide the cost and systems redesign that would be required by SSA to remove the use of the SSN and implement the alternate method(s) of verifying individual identities.

[If you have any questions or require additional information you may contact Margaret Jefferson at ext. 64482.](#)

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