



**OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
HEALTH AFFAIRS**

SKYLINE FIVE, SUITE 810, 5111 LEESBURG PIKE
FALLS CHURCH, VIRGINIA 22041-3206

March 2, 2011

TRICARE
MANAGEMENT
ACTIVITY

MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Use of the Social Security Number (SSN) for
TRICARE Young Adult Application Form

This memorandum is written to satisfy the requirement established in the Office of Under Secretary of Defense (OUSD) Personnel and Readiness (P&R) Directive-Type Memorandum 07-015-USD (P&R), "DoD Social Security Number (SSN) Reduction Plan" (DTM 07-015), that requires justification of the collection and use of the SSN on department forms. This justification pertains to the proposed TRICARE Young Adult Application is included as Attachment A.

The TRICARE Young Adult Application form used to collect personally identifiable information (PII) is covered by System of Records Notice DMDC 02 DoD, Defense Enrollment Eligibility Recording System (DEERS) (August 7, 2009, 74 FR 39657), as a Privacy Act of 1974, as amended, system of records pursuant to DoD 5400.11-R, "Department of Defense Privacy Program," May 14, 2007. DMDC 02 is included as Attachment B

The TRICARE Young Adult Application is a proposed DoD beneficiary completed form to relay their intent to purchase, change or terminate their coverage in the TRICARE Young Adult (TYA) Program. Regional Managed Care Support Contractors (MCSCs) are required to use information contained on the form to enter the information into DEERS (Defense Online Enrollment System [DOES] application) that will reflect the beneficiary-requested enrollment status. Historically, the SSN has been the primary identifier to effect an enrollment on the DOES application and this is the current process in use. The Defense Manpower Data Center (DMDC) Privacy Impact Assessment (PIA) for DEERS, dated 15 December 2006, and the Paperwork Reduction Act Submission with respect to the proposed TYA application form are included as Attachments C and D, respectively.

DTM 07-015, Attachment I, Paragraph 2.c.(11), includes "Legacy System Interface" as an acceptable use of the SSN so long as there are plans in place for the migration away from the SSN in the future. The documents and discussion below sets forth why the SSN still needs to be currently collected on the TRICARE Young Adult form due to legacy system interface and also details plans that will allow migration away from collecting SSNs on these forms in the future.

TMA has an SSN Reduction Plan for its Purchased Care Operations dated April 22, 2010 (copy included as Attachment E). The TMA Plan is in-line and consistent with the November 5, 2010 Under Secretary of Defense, Personnel and Readiness Memorandum titled "Updated Plan for the Removal of Social Security Numbers (SSNs) from Department of Defense (DoD) Identification (ID) Cards" (Attachment F).

Starting in January 2011, visibly printed SSNs will be removed from DoD ID Cards. Two new codes (alternative ID numbers) will be printed on the ID Card – the DoD Benefits Number (DBN) and the Electronic Data Interchange—Personnel Identifier (EDI-PI). While both of these codes currently exist, they are not known to DoD beneficiaries. Once they are visibly printed on the ID Card, they will be readily available to and known by DoD beneficiaries. The ID Card life cycle is such that it will be a 3-4 year process before alternative ID numbers replace the visibly printed SSN on the card.

Because TRICARE Young Adult is a premium-based health plan, young adult dependents must purchase TRICARE Young Adult coverage and then can request an ID card be issued. At the time of initial application, they are only aware of the SSN as the primary identifier. Upon purchasing TRICARE Young Adult coverage, an ID card can then be requested by the young adult dependent through the normal ID card processes. At that point, the DBN will be on the ID card and can be used as a primary identifier.

The regional MCSCs (whose systems and interfaces are part of TMA's purchased care operations), were notified in the fall of 2010 to be prepared to begin using a work-around process to query DEERS eligibility using the DBN. Future actions include modification of the TRICARE Systems Manual (TSM) to ultimately require MCSCs to modify their systems to include free-standing DBN and EDI-PI data fields in addition to data fields for the SSN. A final timeline for development of the TSM instructions, coordination, publication, direction to contractors, and contractor implementation time is not yet definitized, but activities will likely be finalized in the next 24 months.

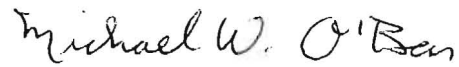
Based on the above, the SSN still needs to be collected on the TRICARE Young Adult application form until DoD beneficiaries are cognizant of alternate identifiers and where to find them in order to input these numbers on an enrollment form instead of the SSN. This will logically occur when the SSN is visibly replaced on the DoD ID Card with the alternate identifiers. As indicated above, this process began in January 2011 and will be a 3-4 year process.

When the required renewal for the TRICARE Young Adult Application form occurs again in three years, the agency will make a recommendation regarding inclusion of the DBN as a new field on enrollment forms to be used in lieu of the SSN. At this time, beneficiaries (who complete the form) will be more knowledgeable about what this

number is and where to find it and contractor's purchased care systems will have been modified to include free-standing alternate identification numbers.

TRICARE Young Adult Forms are secured to protect PII in accordance with DoD Regulations.

If there are any questions, my point of contact is Mr. Mark Ellis, (703) 681-0039.



Mr. Michael O'Bar
Deputy Chief
TRICARE Policy & Operations

Attachments

COORDINATION

TMA, OGC

Mr. Paul Bley _____

TMA/Privacy and Civil Liberties Office

Ms. Leslie Shaffer _____