



DEFENSE
HEALTH AGENCY

**OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
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MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Use of the Social Security Number on the Form "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" (DD Form 2642)

Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012, requires a memorandum to justify collecting and using Social Security Numbers (SSNs) on Department forms. This justification memorandum pertains to the revision and renewal of DD Form 2642, "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" (DD Form 2642). The current version of DD Form 2642 is included as Attachment 1.

The form "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" is used to collect personally identifiable information (PII) and protected health information (PHI) and is covered by System of Records Notice EDTMA 04, Medical/Dental Claims History Files (November 18, 2013, 78 FR 69706), as a Privacy Act of 1974 system of records pursuant to DoD 5400.11-R. "Department of Defense Privacy Program," May 14, 2007. EDTMA 04 is included as Attachment 2.

The form "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" is used by TRICARE beneficiaries to request payment for medical costs for which they have paid. Historically, the SSN has been the primary identifier on the DD Form 2642 which the health care contractors use to verify beneficiary eligibility through the Defense Eligibility Enrollment Reporting System (DEERS).

The Defense Health Agency (DHA), as successor to the TRICARE Management Activity, has a SSN Reduction Plan for its Purchased Care Operations. The DHA plan is in-line and consistent with the Defense Manpower Data Center's (DMDC) plan to remove SSNs from DoD Identification (ID) Cards. Starting in late 2011, visibly printed SSNs were removed from DoD ID Cards. Two new codes (alternative ID numbers) are printed on the ID Card -- the DoD Benefits Number (DBN) and the Electronic Data Interchange-Personal Identifier (EDIPI). While both of these codes currently exist, they are not known to all DoD beneficiaries. Due to the ID card lifecycle, we estimated a three to four year process before alternative ID numbers replace the visibly printed SSN on the card. At this point, we are two years into the process, we anticipate all active duty service members or active duty family members cards will be updated in the next two years. We acknowledge updates to retiree cards will be on-going for years, as they have "indefinite" card expiration dates. We

anticipate those updates will be done as retirees received word on the SSN removal and opt to update their cards or when they update due to damage or lost cards.

TRICARE health care contractors (whose systems and interfaces are part of DHA's purchased care operations), have a process to query the Defense Enrollment Eligibility Reporting System (DEERS) to determine an individual's eligibility using the DoD Benefits Number. The TRICARE Systems Manual (TSM) require health care contractors to modify their systems to include free-standing DBN and EDI-PI data fields in addition to data fields for the SSN.

Based on the above, the SSN still needs to be collected on the form "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" until all DoD beneficiaries are cognizant of alternate identifiers and where to find them in order to input these numbers on the claim 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 late 2011 and was estimated to be a three to four year process with two years now remaining. As soon as possible, the agency will make a recommendation regarding inclusion of the DoD Benefit Number as a new field on the claim form to be used in lieu of the SSN. At that time, beneficiaries will be more knowledgeable about what this number is and where to find it.

TRICARE's form "TRICARE DoD/CHAMPUS Medical Claim-Patient's Request for Medical Payment" is secured to protect PH/PHI in accordance with DoD Regulations.

DoDI 1000.30, Enclosure 2, 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 above information reflects why the SSN still needs to be currently collected on DD Form 2642 due to legacy system interface, but also details plans that will allow migration away from collecting it on DD Form 2642 in the future.

If there are any questions, my point of contact is Shane Pham. She can be reached at shane.pham@dha.mil or at (703) 681-8666.



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