



DEFENSE
HEALTH AGENCY

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

16401 EAST CENTRETECH PARKWAY
AURORA, CO 80011-9066

MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Requirement of Social Security Number (SSN) on TRICARE Active Duty Dental Program (Dental Health)

Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012 (DoDI 1000.30), requires a memorandum to justify collecting and using Social Security Numbers (SSNs) on Department forms collecting personally identifiable information such as an SSN. This justification memorandum pertains to the TRICARE Active Duty Dental Program (Dental Health) Claim Form (ADDP Form) (Attachment 1).

The ADDP Form is used by dentists who are not part of the Military Health System (MHS) or who are not part of a military Dental Treatment Facility (DTF) who provide dental care to Active Duty/Guard/Reserve members of the Uniformed Forces (ADSMs) to assess an ADSM's dental health for worldwide duty and provide necessary treatment to allow long term worldwide deployment. The information collected through the ADDP Claim Form is used to determine "fitness for prolonged duty without ready access to dental care," and so providers may bill for authorized care provided to eligible members. It is intended to address the ADSM's comprehensive dental needs that cannot be met by a DTF or where a DTF is not within 50 miles of the member's duty station and residence. The dentist providing the care, if a network provider, is required to complete and submit the ADDP Claim Form on behalf of the member and not bill the member for any charges for authorized care. For care completed by non-network providers, the ADDP Claim Form may be completed by either the provider or the ADSM. PII collected through the ADDP Claim Form includes the ADSM's name, SSN, mailing address, phone number and email address.

DoDI 1000.3 focuses on collection and use of SSNs within the DoD. Although DoD may require use of an ADSM's DoD Identification Number (or EDI-PN) for internal DoD business processes, DoD ID Numbers are not used to support business processes outside DoD. See DoDI 1000.30, Enclosure 2, Paragraph 4.a(3).

Processing claims and paying claims submitted by healthcare providers to TRICARE is not an internal DoD business process for which the patient's DoD ID number may be used by the dentist as an identifier. However, both examining dentist and the DoD must have a means to accurately identify the ADSM examined and with respect to which TRICARE payment for the examination is claimed. The ADSM's name and SSN provide the necessary identifiers for mutual identification requirements of TRICARE and the examining dentist.

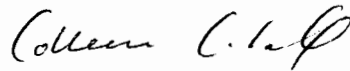
To the extent the information collected through the ADDP Claim Form is used for the dental provider's electronic claims processing, the dental provider is engaged in a standard electronic

claims transaction which is subject to the HIPAA Transaction and Code Set (TCS) Standard for Electronic Claims. See 45 CFR Parts 160 and 162 (HIPAA Transactions Rule). Because no HIPAA standard for individuals to have national patient identifiers has been established, the HIPAA Transactions Rule and the HHS transaction and code set standards for electronic claims requires the provider (e.g., dentist) and the payer (e.g., TRICARE) to use SSNs as the common identifier.

DoDI 1000.30, Enclosure 2, Paragraph 2.c(11), Legacy System Interface, and Paragraph 2.c(13), Other Cases, support the collection of an ADSM's SSN through the ADDP Form.

The system of records notices (SORNs) applicable to the ADDP Form as used to submit dental claims to TRICARE is EDTMA 02, Medical/Dental Care and Claims Inquiry Files (November 18, 2013, 78 FR 69076) (Attachment 2) and EDTMA 04, Medical/Dental Care and Claim History Files (November 18, 2013, 78 FR 69076) (Attachment 3). Attachment 4 is the April 29, 2014 Privacy Impact Assessment with respect to the United Concordia Active Duty Dental Program.

My point of contact for this action is Gene Mays. He can be reached at gene.c.mays.civ@mail.mil, or (303) 676-3528].



COL Colleen Shull
Acting Chief, Dental Care Office

Attachments:
As stated