



DEFENSE
HEALTH AGENCY

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

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MEMORANDUM FOR THE RECORD

SUBJECT: Justification for the Use of the Social Security Number (SSN) for TRICARE Retiree Dental Program Enrollment Application Form

This memorandum is written to satisfy the requirement established by Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012, that requires justification of the collection and use of the SSN on department Forms. This justification pertains to the TRICARE Retiree Dental Program Enrollment Application Form (TRDP Application), included as Attachment A.

The TRDP Application is used to collect personally identifiable information (PII) into a system of records under the Privacy Act of 1974. The TRDP Application is covered by system of records notices DTMA 04, Medical/Dental Claim History Files (November 18, 2013, 78 FR 69076) (Attachment B), and DMDC 02 DoD, Defense Enrollment Eligibility Reporting System (DEERS) (November 21, 2012, 77 FR 69807) (Attachment C). Attachment D is the DHA Privacy and Civil Liberties Office's Privacy Act Review of the TRDP Application.

The TRDP Application form is completed by a retired Service member eligible for the TRDP to apply for dental benefits under the TRDP. The applicant is requested to provide either the applicant's SSN or DoD Benefits Number (DBN). Other data requested by the Form includes contact, family members to be enrolled, and premium prepayment information.

PII collected through the TRDP Application is used by the TRDP contractor to determine, through DEERS, the applicant's eligibility to participate in the TRDP and, if eligible, to register the applicant and any designated family members, into the TRDP. The TRDP Application also provides the TRDP contractor the information necessary to establish an electronic payment method to provide for TRDP premium payments if the applicant's retired pay is insufficient to pay the TRDP premiums.

For the continued collection of SSNs under DoDI 1000.30, the Department's use of SSNs must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use Cases applicable to the TRDP Application are found in Paragraph 2.c.(4), Interactions with Financial Institutions, and Paragraph 2.c.(11), Legacy System Interface.

Acceptable Use Case 2.c(4) permits SSN collection where it may be necessary to have an individual's SSN "for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions." Financial institutions with which electronic payment methods are established (see TRDP Application Section C in

Attachment A) may request the applicant's SSN or last four SSN digits to validate the establishment of an electronic payment method on behalf of the applicant.

Verification of an applicant's eligibility for the TRDP Program is verified by the TRDP contractor through DEERS. An eligibility determination through DEERS may be made through the use of the individual's name and either SSN or DBN. DEERS ability to use either SSN or DBN (even though DBNs are preferred) assures that Active Duty and retired Service members, and their families, can determine, review, and verify their eligibility for TRICARE health programs, including TRDP even if they do not know the DBN assigned to the sponsor or to them.

Even though DoD has made efforts to inform TRICARE beneficiaries of their DBNs and encourage use of DBNs in lieu of SSNs on Forms and other information collections where SSNs are not otherwise necessary, some beneficiaries remain unaware of the DBNs of their sponsors or the DBN that may have been assigned to them. However, military retirees, their surviving unmarried spouses, and/or their surviving children (all of who may sign the TRDP Application as "Applicant" (see TRDP Application Section F in Attachment A)) will know their SSN (or the SSN of the related military retiree) even if they do not know the applicable DBN. While DEERS inquiries may use the DBN instead of SSNs, the DBN is not always sufficient as the sole primary identifier permitted on the TRDP Application or in connection with the Defense Online Enrollment System (DOES) application interface with DEERS (where the SSN has traditionally been the primary identifier).

In the circumstances described above, Acceptable Use Case 2.c(11), Legacy System Interface, is applicable. It assures that those individual's completing the TRDP Application as applicant may apply for available benefits.

If there are questions, my point of contact is Gene Mays, telephone (303) 676-3528, and email gene.c.mays.civ@mail.mil.

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COL Colleen Shull
Acting Chief, Dental Care Office

Attachments:
As stated