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HEALTH AFFAIRS**

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DEFENSE
HEALTH AGENCY

MEMORANDUM FOR THE DEFENSE PRIVACY AND CIVIL LIBERTIES DIVISION

SUBJECT: Justification for the Continued Use of the Social Security Number (SSN) in System Records Notice EDHA12, Third Party Collection System (TPCS); Armed Forces Billing and Collection Utilization Solution (ABACUS) (DITPR ID 15754)

This memorandum is provided to the Defense Privacy and Civil Liberties Division (DPCLD) under DoDI 1000.30, Reduction of Social Security Number (SSN) Use Within DoD, August 1, 2012 (USD(P&R) (DoDI 1000.30). This memorandum is part of the Defense Health Agency (DHA) submission of alterations to system of records notice (SORN) EDHA 12, TPCS November 18, 2013, 78 FR 69076 (Attachment A). The alterations to Attachment A are set forth in Attachment B. The DITPR ID assigned to ABACUS is 15754. The Privacy Impact Assessment for the ABACUS system that supports TPCS became effective June 29, 2015 (Attachment C). The Office of Management and Budget (OMB) Control Number for this system of records is 0720-0055, Third Party Collection Program. OMB approval expires June 30, 2016. Current DD Form 2569, Third Party Collection Program/Medical Services Account/Other Health Insurance is Attachment D to this memorandum.

This memorandum provides justification for the continued collection of use of SSNs by ABACUS in support of the TPCS.

ABACUS supports medical billing and is the DoD standard system designed to assist military treatment facilities (MTF) in the collection, tracking, and reporting of data required in the Third Party Collection Program billing process. TPCS provides a mechanism to MTFs for identifying, recording, billing and collecting reasonable costs for medical and dental care provided. ABACUS supports processing of standard claims CMS 1500 and UB-04 and invoices which are populated using an electronic interface from on-site systems including the Composite Health Care System (CHCS), the Ambulatory Data Module, and the Central Events Repository. TPCS/ABACUS also supports the following processes:

- Data migration
- Help desk support
- Training and maintenance
- Clearinghouse services
- Electronic Other Health Insurance discovery
- Pharmacy Claims
- High Cost Ancillary Services Claims
- Supplemental Billing
- Secondary Transaction Codes
- Audit Trail (for purposes of fraud prevention)

- Batch Processing

In accordance with *DoDI 1000.30*, continued use of SSNs within ABACUS must be justified by one or more of the Acceptable Use Cases set forth in *DoDI 1000.30 Enclosure 2*. The Acceptable Use Case applicable to TPCS and ABACUS is:

2.c(13) Other Cases. The previous categories may not include all uses of the SSN delineated by law. Should an application owner be able to show sufficient grounds that a use case not specified in subparagraphs 2.c.(1) through 2.c.(12) of this enclosure is required by law, then that use case may continue to use the SSN. Any application that seeks to use this clause as justification must provide specific documentation in order to continue use under this provision.

As a Health Insurance Portability and Accountability Act (HIPAA) covered entity, DoD must comply with electronic health care transaction standards adopted in the Final Rule entitled: Health Insurance Reform; Modifications to the HIPAA Electronic Transaction Standards (45 CFR Part 162 [CMS-0009-F] RIN 0938-AM50). HIPAA named and adopted standards for electronic Professional, Institutional and Retail Pharmacy drug claims are as follows:

- Professional Health Care Claims: Data Interchange Technical Report Type 3-Health Care Claim: Professional (837), May 2006, ASC X12N/005010X222
- Institutional Health Care Claims: The ASC X12 Standards for Electronic Data Interchange Technical Report Type 3-Health Care Claim: Institutional (837), May 2006, ASC X 12N/0050 IOX223, and Type 1 Errata to Health Care Claim: Institutional (837) ASC X12 Standards for Electronic Data Interchange Technical Report Type 3, October 2007, ASC X12N/0050IOX223A1
- Retail Pharmacy Drug Claims: National Council for Prescription Drug Programs (NCPDP) Telecommunication Standard Implementation Guide, Version D, Release 0 (Version D.O), August 2007

These standards specify the data that are required for electronic Professional, Institutional, and Pharmacy health care claims and provide for use of SSNs under certain circumstances to identify providers, prescribers, subscribers, and patients when other identifiers are not available. The DoD Identification Number, which is used for internal DoD business transactions and operations, cannot be used transactions with third party payers and other health insurance providers. Additionally, not all patients treated by the DoD are in fact DoD Beneficiaries and are not assigned a DoD Identification Number. Another situation in which SSNs may be necessary is in connection with pharmacy claims. The NCPDP Pharmacy claim allows a Prescriber to be identified with an SSN when the Prescriber's National Provider Identifier (NPI) is not available. Likewise, the SSN is used in the 2010BA Subscriber Name Loop in X12 Professional and Institutional claims as a Secondary Identifier for the Subscriber when other identifiers are not available.

The Solution Delivery Program Executive Office point of contact for this program is Mr. James Marsden, Project Manager and Contracting Officer Representative, ABACUS. Mr. Marsden may be reached at (210) 808-2833 or james.l.marsden2.civ@mail.mil.

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Attachments:
As stated