

## **Justification for Using SSNs**

- **Is personally identifiable information being collected?**

Yes, there is personally identifiable information being collected.

- **Is the SSN being collected?**

Yes, the SSN is being collected.

- **Is the information being collected electronically?**

No, information is not being collected electronically.

- **Is the information stored electronically?**

No, information is not stored electronically.

- **Why do you need to use the SSN?**

All title II and Medicare entitlement is established by SSA and based on a social security number (SSN). Specifically, sections 226 and 226A of the Social Security Act (the Act) outline that individuals become entitled to Medicare premium-free Part A based on their entitlement to Social Security benefits under section 202 of the Act and other circumstances in which taxes are paid. One such circumstance is for individuals who apply for Medicare on the basis of having End-Stage Renal Disease (ESRD). Such payments are tracked by SSN via the Social Security Administration (SSA), and reviewed when an individual applies for benefits to determine if the criteria outlined for Medicare entitlement are met. There is no alternate method that SSA uses for identifying the individual or the record where entitlement exists. As such, when information is required to establish eligibility for a Medicare benefit, the SSN of the applicant (and in some cases the SSN of another individual for which the applicants is claiming a relationship to have that person's tax payments count towards their entitlement, such as a spouse, parent, etc.) is collected in order for SSA to determine if the benefit can be established, as outlined in law. The SSN is also used to assure individuals with similar names are accurately identified and processed properly.

- **What will happen if you cannot use the SSN as a data element?**

If the SSN is not used, the Federal Government will not be able to identify individuals applying for the Medicare benefit and determine if they meet the criteria outlined in law. This will result in denials of Medicare benefits for those legally entitled to coverage based on ESRD.

- **Explain alternative data elements considered and why you do not consider them suitable replacements for the SSN.**

SSA uses the SSN to determine Title II benefits for which Medicare entitlement is derived. Presently, there are no other suitable replacements.