

Justification for Collecting Social Security Numbers

Social Security numbers (SSN) may NOT be collected unless it is absolutely necessary (e.g., a statutory requirement). If you believe your collection must collect SSNs, you must provide the rationale for using the SSN as a data element. Please make sure to list and explain any public law, U.S. Code, Executive Order, or statute that mandates or authorizes the use of the SSN. Please respond to all of the following questions:

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

All Title II and Medicare entitlement is established by the Social Security Administration (SSA) and based on an 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. However, there are circumstances for which individuals who are not entitled to Social Security benefits or Railroad Retirement benefits must apply for Medicare Part A. The information provided by the applicant is tracked by SSN via 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 applicant 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 ensure 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 properly 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.

- **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 suitable replacements. Further, CMS does not obtain or process applications for Social Security or Medicare benefits, therefore, it cannot assign an alternative identifier at the time the application is filed.

- **What are the costs associated with alternatives?**

N/A