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DHA Privacy
Office Review:

MEMORANDUM FOR THE DEFENSE PRIVACY, CIVIL LIBERTIES, AND
TRANSPARENCY DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) for TRICARE
Young Adult Application Form, DD FORM 2947

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 for the collection and use of the SSN on department Forms. This justification pertains to the TRICARE Young Adult Application Form, DD FORM 2947, which is included as Attachment A.

The TRICARE Young Adult Application is used to collect personally identifiable information (PII) into a system of records under the Privacy Act of 1974. The Form is covered by System of Records Notice DMDC 02 DoD, Defense Enrollment Eligibility Reporting Systems (DEERS) (July 27, 2016, 81 FR 49210). DMDC 02 DoD is included as Attachment B.

The TRICARE Young Adult Application is a DoD form completed by beneficiaries to relay their intent to purchase, change, or terminate their coverage in the TRICARE Young Adult (TYA) Program. The Form requests either the SSN or DoD Benefits Number (DBN) of the sponsor and young adult applicant. Other data requested by the Form includes contact and financial information, as well as information regarding other health insurance.

Regional Managed Care Support Contractors (MCSCs) are required to enter the information contained in the Form into the Defense Enrollment Eligibility Reporting System (DEERS) using the Defense Online Enrollment System (DOES) application, which will reflect the beneficiary-requested enrollment status. Historically, the SSN has been the primary identifier to update an enrollment, change or termination using the DOES application and this is still the current process. The Defense Manpower Data Center Privacy Impact Assessment for DEERS, dated 12/02/2015, is included as Attachment C. The Defense Information Technology Portfolio Repository (DITPR) number for DEERS is 1391.

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 TRICARE Young Adult Application (as referenced above) are 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 (Section VI of 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.

Further, MCSCs must input the information on the Form into DOES, which has historically used the SSN as the primary identifier. Though DOES is able to use both the SSN and DBN as the primary identifier, eliminating the collection of the SSN altogether would not be feasible at this time.

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 their sponsors' DBN. However, with regard to Acceptable Use Case 2.c(11), TRICARE beneficiaries are aware of their sponsor's SSN, which has historically been collected by multiple DoD agencies (especially in cases of Legacy Systems) to confirm available benefits. Therefore, the DBN is not always sufficient as the sole primary identifier permitted on the TRICARE Young Adult Application (as referenced above) or in connection with the DOES application interface with DEERS.

For these reasons, the TRICARE Young Adult Application is needed to collect the SSN for at least some individuals and circumstances under the Acceptable Use Cases found in Paragraphs 2.c.(4) and 2.c.(11).

If there are questions, my point of contact is Ms. Shane Pham, who may be reached at shane.m.pham.civ@mail.mil, or by phone at (703) 681-8666.

Danita F. Hunter
Chief, TRICARE Policy & Benefits Branch

Attachments:
As stated