



DEFENSE
HEALTH AGENCY

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

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MEMORANDUM FOR THE DEFENSE PRIVACY AND CIVIL LIBERTIES DIVISION

SUBJECT: Justification for the Use of the Social Security Number (SSN) for DD Form 2876, TRICARE Prime Enrollment, Disenrollment, and Primary Care Manager (PCM) Change 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 for the collection and use of the SSN on department Forms. This justification pertains to the updated TRICARE Prime Enrollment, Disenrollment, and Primary Care Manager (PCM) Change Form (TRICARE Prime Form) dated 8/18/2015, which is included as Attachment A.

The TRICARE Prime Form 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 System (DEERS) (November 21, 2012, 77 FR 69807). DMDC 02 DoD is included as Attachment B.

The TRICARE Prime Form is a DoD form completed by beneficiaries to formally enroll in, change, or terminate their coverage in the TRICARE Prime health plan. The Form requests either the SSN or DoD Benefits Number (DBN) of the sponsor. Other data requested by the Form includes contact and financial information, each enrollee's date of birth, as well as information regarding other health insurance. The form may also be used by the sponsor's eligible family members, but only requests the SSN/DBN of the sponsor.

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 7/9/2014, is included as Attachment C.

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 DD Form 2876 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 the DBNs of their sponsors. However, TRICARE Prime beneficiaries are aware of their sponsor's SSN, which has historically been collected by multiple DoD agencies to confirm available benefits. Therefore, the DBN is not always sufficient as the sole primary identifier permitted on the TRICARE Prime Form or in connection with the DOES application interface with DEERS.

For these reasons, DD Form 2876 continues needing 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).

TYA forms are secured to protect PII in accordance with DoD Regulations.

If there are questions, my point of contact is Mr. Ralph (Doug) McBroom, who may be reached at ralph.d.mcbroom.civ@mail.mil, or by phone at (303) 676-3533.

Kathy Larkin
Chief, Health Plan Policy
& Execution

Attachments:
As stated