



OVERSIGHT AND
COMPLIANCE

OFFICE OF THE CHIEF MANAGEMENT OFFICER
9010 DEFENSE PENTAGON
WASHINGTON, DC 20301-9010

January 9, 2020

MEMORANDUM FOR THE DEFENSE HEALTH AGENCY

SUBJECT: Justification for the Use of Social Security Numbers in DD Form 2837, Continued
Health Care Benefit Program (CHCBP) Application - Accepted

Thank you for completing a review of Social Security Number (SSN) use within this system. The Defense Privacy, Civil Liberties and Transparency Division (DPCLTD) has reviewed this request and has accepted your justification to use the SSN for the purpose of (11) Legacy System Interface, to interface with the DOES system for the purpose of verifying the identity of those Defense Health Agency (DHA) beneficiaries currently unaware of their Department of Defense (DoD) Benefits Number (DBN). This form must be reviewed on a continuous basis and a new justification must be provided if any change to the form is submitted.

Acceptable Use (4) Interactions with Financial Institutions, was not accepted. A SSN is not necessary to reimburse payments for services to beneficiaries.

The DPCLTD recommends the order of collection of the DBN and the SSN changed throughout the form (to include instructions). The DBN should be collected first followed by the option for the collection of the SSN if necessary. The instructions should indicate the SSN is only necessary in the event a DHA beneficiary is unaware of their DBN.

While this form has been identified as requiring the collection, maintenance and use of the SSN, you must ensure this data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards. Also, please maintain a copy of your justification and this memo in your records.

SSN Justifications must be renewed three (3) years after the date of this memorandum if the associated form has not been updated.

If you have any questions, please contact Ms. Cheryl Jenkins at (703) 571-0026 or e-mail, cheryl.jenkins8.civ@mail.mil.

Cindy L. Allard
Chief, Defense Privacy, Civil Liberties,
and Transparency Division

cc:
WHS/ESD/DD (Forms)