

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?**

Under §205(c)(1) of the Social Security Act (the Act), the Commissioner of the Social Security Administration (SSA) is required to establish and maintain records of the amount of wages paid to each individual and the amounts of self-employment income. These earnings determine an individual's (and/or his/her dependent's or survivor's) eligibility for and the amount of Social Security benefits and eligibility for Medicare. In order to accomplish the aforementioned task, the Commissioner of SSA assigns SSNs to all individuals; including applicants for or recipients of any federally funded program (e.g. Social Security, Supplementary Security Income benefits, Medicare), aliens who are lawfully present in the United States and children. The SSA uses the SSN as the record identifier for applicants for or recipients of social security and/or Medicare benefits.

The SSN is required to assure individuals with similar names are accurately identified and properly processed. The SSN is used to identify spousal and Social Security Act Title II benefits relationship for eligibility for premium-free Hospital Insurance (Part A) and Supplementary Medical Insurance.

- **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 or verify eligibility based on earnings records, resulting in the denials of Part A and Part B enrollments.

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

The Social Security Administration 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