



Administration &
Management
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January 13, 2021

MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY
DIVISION

THROUGH: Defense Health Agency (DHA), Privacy and Civil Liberties Office

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) on DD Form 2947,
TRICARE Young Adult (TYA) Application

This memorandum is to satisfy the requirements of the Department of Defense Instruction (DoDI) 1000.30, Reduction of SSN Use Within Department of Defense (DoD), dated August 1, 2012, that requires justification of the collection and use of SSNs in DoD forms. This justification pertains to the proposed revision to DD Form 2947, TRICARE Young Adult (TYA) Application (Enclosure 1).

The DD Form 2947 collects data, including SSN, on individuals seeking to enroll, change, or terminate their coverage in TYA Prime and Select health plans. Individuals who are losing regular TRICARE coverage under the Military Health System (MHS) may apply for TYA at the age of 21 (age 23 if previously enrolled in a full-time course of study at an institution of higher learning) until reaching age 26, if not married and not eligible for employer-sponsored medical coverage. Each individual seeking to enroll in or change their enrollment status in the TYA is requested to provide either the SSN or Defense Benefits Number (DBN) of the individual applicant and the sponsor.

The completed DD Form 2947 is sent to the regional Managed Care Support Contractor (MCSC) to manage enrollment status of the beneficiaries. The MCSC will first put the information from the DD Form 2947 into the Defense Enrollment Eligibility Reporting System (DEERS) using the Defense Online Enrollment System (DOES) web-based application. The information is then manually input into the MCSC database.

The system of records notice applicable to DD Form 2947 is DMDC 02 "Defense Enrollment Eligibility Reporting Systems (DEERS)," (July 27, 2016, 81 FR 49210) (Enclosure 2). The DEERS privacy impact assessment was approved on December 2, 2015 (Enclosure 3). The Department of Defense Information Technology Portfolio Repository identification number for DEERS is 1391. DD Form 2947 is not subject to the Paperwork Reduction Act.

In accordance with DoDI 1000.30, continued use of SSNs within DD 2947 must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Uses applicable to TYA are:

Acceptable use 2.c.(4) Interactions with Financial Institutions: Financial institutions may require that individuals provide the SSN as part of the process to open accounts. It may therefore be required to provide the SSN for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.

The premiums for TYA are paid on a monthly recurring basis either through credit card or electronic funds transfer through the applicant's financial institution. The TYA program does not accept any other form of payment. The information collected on the DD Form 2947, including the SSN, may be requested by the financial institution in order to establish and validate the electronic payment method. As such without the provision of the SSN, TYA premiums cannot be paid upon enrollment. Of note, though not established through the form, recurring electronic payments may be set up for premiums thereafter.

Acceptable use 2.c.(11) Legacy System Interface: This use applies because many systems, processes, or forms that do not meet the criteria in subparagraphs 2.c.(1) through 2.c.(10) of this enclosure for the continued use of the SSN may not be able to transition to another identifier in a timely manner due to an interface with a legacy system still using the SSN, or due to the excessive cost associated with the change. In these cases, the continued use of the SSN may be acceptable for a specified period of time, provided that formalized, written plans are in place for the migration away from the SSN in the future. Plans to alter these use cases must consider interactions with other applications as well as all methods for entry, processing, or transfer of information from said application. It is critical that transfer away from the SSN does not cause unacceptably long interruptions to continued operations. Also, information collected through DD Form 2947 is input into DEERS through the DOES application, which has historically used the SSN as the primary identifier. Though applicants may use their DBN as their primary identifier on the form, removing the SSN as an option is not feasible at this time.

While many beneficiaries are aware of their DBN due to the phase out of SSNs on DoD identification cards, there are still beneficiaries unfamiliar with their DBN, or unaware that one exists because it has not been added to their DoD identification card yet. However, these individuals will know their SSN, or the SSN of the family member being enrolled. The following beneficiary categories don't have DBNs on their Uniformed Services ID Card:

- Retired Members who retired prior to June 1, 2011 may still be in possession of a DD Form 2 (Retired) with an INDEF expiration date that displays their SSN.
- Permanently incapacitated dependents who became eligible for benefits prior to June 1, 2011 and were issued an ID card with an INDEF expiration date may still be

- in possession of an ID card that displays their SSN.
- All dependents who turned 75 prior to June 1, 2011 and were issued an ID card with an INDEF expiration date may still be in possession of an ID Card that displays their SSN.
- Former members who are eligible for retired pay and elect discharge in lieu of transfer to the reserve retired list prior to June 1, 2011, and have not yet turned age 60, may still be in possession of a DD Form 2 (Reserve Retired) with an INDEF expiration date that displays their SSN.

Until such time as all beneficiaries are informed and aware of their DBN, the SSN will continue to be needed on DD Form 2947 in order to verify identity. The DBN was created as a long-term replacement for the SSN, but it has been always understood that until all ID cards have been updated, we would continue to accept collection of the SSN as an alternative. The MHS cannot mitigate the lack of the DoD Benefits Number on Uniformed Services ID Cards – only the military personnel community can.

Even if the ID cards do contain a DBN, DoD Instruction 1000.13, Enclosure 3, paragraph 1.g. states “ID cards shall be retrieved by the sponsor or sponsoring organization when the ID card has expired, when it is damaged or compromised, or when the card holder is no longer affiliated with the DoD or no longer meets the eligibility requirements for the card.” Because applicants have up to the age of 26 after the loss of TRICARE eligibility at the age of 21 or 23 (if a full time student at an approved institution for higher learning) for military medical benefits to apply for TYA coverage, it is possible that the individual’s ID card that contained the DBN was turned in by the sponsor at the time the family member loss eligibility. Therefore, the applicant may no longer have access to the DBN if the applicant is no longer in physical possession of an ID card that would provide evidence of an individual’s DBN.

My point of contact for questions related to this memorandum is Mr. Mark Ellis, who may be contacted at 703-967-6819 or mark.a.ellis14.civ@mail.mil

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Enclosure:
As stated