



Administration &
Management
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DEFENSE HEALTH AGENCY
7700 ARLINGTON BOULEVARD, SUITE 5101
FALLS CHURCH, VIRGINIA 22042-5101

24 May 2023

**MEMORANDUM FOR DEFENSE PRIVACY, CIVIL LIBERTIES AND FREEDOM
OF INFORMATION DIRECTORATE**

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

SUBJECT: Justification for the Use of the Social Security Number (SSN) on DD Form 2837, Continued Health Care Benefit Program (CHCBP) Application

This memorandum is to satisfy the requirements of the *Department of Defense Instruction (DoDI) 1000.30, Reduction of Social Security Number (SSN) Use Within DoD*, dated August 1, 2012, that requires justification of the collection and use of SSNs in DoD forms which includes the DD Form 2837, Continued Health Care Benefit Program (CHCBP) Application (Attachment 1).

DD Form 2837 collects data, including SSN, on individuals seeking to enroll, or change their enrollment category, in the CHCBP. Individuals who are losing health care coverage under the MHS may apply for individual or family coverage for 18 to 36 months. Each individual seeking to enroll or change their enrollment status is requested to provide either their SSN or Defense Benefits Number (DBN).

The completed form is sent to the CHCBP contractor to manage enrollment status of beneficiaries. The contractor will first input the information from the form into the Defense Enrollment Eligibility Reporting System (DEERS) using the Defense Online Enrollment System (DOES) application. The information is then manually input into the contractor databases.

The System of Records Notice applicable to DD Form 2837 is DMDC 02 DoD, Defense Enrollment Eligibility Reporting Systems (DEERS) (May 31, 2022; 87 FR 32384).¹ The Privacy Impact Assessment (PIA) for DEERS was approved on December 2, 2015.² The Department of Defense Information Technology Portfolio Repository (DITPR) identification number for DEERS is 1391. DD 2837 is not subject to the Paperwork Reduction Act (PRA).

In accordance with DoDI 1000.30, continued use of SSNs within DD 2837 must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2.

¹ <https://www.federalregister.gov/documents/2022/05/31/2022-11610/privacy-act-of-1974-system-of-records>

² https://dwp.dmdc.osd.mil/dwp/api/download?fileName=DEERS_PIA.pdf&groupName=websiteDocuments

The Acceptable Use Cases applicable to CHCBP are:

Use case 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.

Premium Payments for the CHCBP are required and acceptable Use Case 2.c(4) permits SSN collection where it may be required to interact with financial institutions. DD Form 2837 only records the initial premium payment for CHCBP applicants, which is required to be made by check or money order. Though not established through the form, recurring electronic payments may be set up for premiums thereafter. The information collected on the form, including the SSN, may be requested by the financial institution in order to establish the electronic payment.

Acceptable Use Case 2.c.(11) Legacy System Interface - 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 take into account 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 2837 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 2837 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 an 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 60 days after the loss of all eligibility for military medical benefits to apply for CHCBP coverage, it is possible that the individual’s ID card that contained the DBN was turned in by the sponsor at the time of separation processing or for loss of eligibility for a family member, at the time the family member lost eligibility. So, it could well be the applicant may no longer have access to the DBN if they are no longer in physical possession of an ID card that would provide evidence of an individual’s DBN.

The DHA Component/Office point of contact for this program is Ms. Debra Fisher, who can be reached at (703) 275-6224 or debra.l.fisher2.civ@health.mil.

RICHARD C. HART
Chief, Health Plan Design Branch
DHA, TRICARE Health Plan
Richard.c.hart.civ@health.mil

Attachments:
As Stated