



Administration &
Management
(J-1)

DEFENSE HEALTH AGENCY
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February 21, 2024

MEMORANDUM FOR THE 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 Social Security Numbers (SSNs) in Department of
Defense (DoD) DD Form 2896-1, Reserve Component Health Coverage Request.

This memorandum is to satisfy the requirements of the Department of Defense Instruction (DoDI) 1000.30, Reduction of Social Security Numbers (SSN) Use Within DoD, dated August 1, 2012, requiring justification of the necessity for the collection and use of SSNs, which includes the DD Forms 2896-1 (Attachments 1).

The forms collect Personally Identifiable Information (PII), including SSN, on individuals seeking to enroll, change, or terminate their coverage in the TRICARE Reserve Select and TRICARE Retired Reserve (TRS/TRR) health plans or change their PCM. The TRS/TRR health plans are premium-based, health plans for Reserve, retired Reserve members, their families and survivors as indicated within the Defense Enrollment Eligibility Reporting System (DEERS). Individuals seeking to enroll or change their enrollment status in TRS/TRR are requested to provide either their SSN or Defense Benefits Number (DBN) of the individual applicant or their sponsor. Completed forms are sent to the appropriate regional managed care support contractor (MCSC) to manage the enrolment status of the beneficiaries. Once the MCSC inputs the information into DEERS, the information is later input into the MCSC's database.

As completed forms will be incorporated into a system of records, the applicable system of records notice is Defense Manpower Data Center (DMDC) 02 DoD, Defense Enrollment Eligibility Reporting Systems (DEERS) (May 31, 2022; 87 FR 32384).¹ The DMDC previously approved a privacy impact assessment for DEERS and the DoD Information Technology Portfolio Repository Identification Number is 1391.² Additional information about how DEERS supports the Military Health System (MHS) is also publicly available on the DMDC webpage.³ The forms appear to be subject to the Paperwork Reduction Act (PRA), as there is an Office of Management and Budget (OMB) Control Number – 0720.RCHC – associated with the forms and a PRA statement is present on the forms. Further, the PRA history and related information is publicly available.⁴

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

³ https://dwp.dmdc.osd.mil/dwp/api/download?fileName=DEERS_MHS.pdf&groupName=websiteDocuments

⁴ PRA History of OMB Control No. 0720-0008: <https://www.reginfo.gov/public/do/PRASearch>

In accordance with DoDI 1000.30, Enclosure 2, continued use of SSNs within the form must be justified by one or more of the Acceptable Use Cases. The applicable Acceptable Use Cases are as follows:

Acceptable 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. Therefore, providing the SSN may be required for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.

The information, including SSN, collected within the forms may be requested by the financial institution to establish and validate the electronic payment method. Although the TRS/TRR program accepts other forms of payment, monthly recurring allotment is mandate where feasible as per the National Defense Authorization Act for Fiscal Year 2020, Section 702. For example, as monthly recurring allotment is not always feasible, premiums for TRS/TRR may be paid by either credit card or electronic funds transfer through the applicant's financial institution on a monthly recurring basis. As such, the information, including SSN, collected within the forms may be requested by the financial institution to establish and validate the electronic payment method.

Acceptable Use Case 2.c.(11), Legacy System Interface. May systems, processes, or forms that do not meet the criteria in subparagraphs 2.c.(1) through 2.c.(10) within Enclosure two of the DoDI 1000.30 for the continued use of SSN may not be able to transition away 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 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 account for 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.

Information collected within the forms is entered into a legacy system, DEERS, using the Defense Online Enrollment System (DOES) application, which has historically utilized the SSN as the primary identifier. Although DOES currently uses both SSN and DBN as prime identifiers, eliminating the collection and use of SSN is not feasible at this time because many beneficiaries are unaware of their DBN, that the DBN exists, the DBN has not been added to their DoD Identification (ID) Card yet, and some categories of beneficiaries (e.g., retired members prior to June 1, 2011; permanently incapacitated dependents eligible for benefits prior to June 1, 2011, and certain other former members eligible for retired pay and who were discharged in lieu of transfer prior to June 1, 2011) do not have DBN on their Uniformed Services ID Card. Although the DoD continues to make efforts to inform TRICARE beneficiaries of their DBN and encourages the use of the DBN in lieu of SSN, some beneficiaries are also unaware of the sponsor's DBN. As such, although DBN is a potential viable alternative to SSN, DBN is not always sufficient as the sole primary identifier on these forms or in connection with the DOES application interface with DEERS. The MHS remains dependent on the Uniformed Services to implement the DBN on the Uniformed Services ID Cards. Lastly, the forms owners are not responsible for DEERS, which is a legacy system that may not have entirely eliminated the use of SSN.

However, justification for the use of the SSN does not constitute blanket permission to use the SSN. The forms may collect the DBN of an individual's sponsor if known and available and the forms do not collect SSN if not necessary (e.g., in Section II, Question 12a. – 12f.). The ability to provide the DBN, if available and known by the individuals, reduces the vulnerability of SSN collection and use. As more fully described above, broader implementation of the DBN by the Uniformed Services will further reduce the risk associated with the forms. The owner of the forms will continue to take every reasonable step to reduce the use of the SSN and protect it where the use is still required. For additional details as to the elimination of the use of SSN, see the attached plan.

For questions related to this memorandum, please contact Mr. Brian Smith, who may be contacted at (303) 676-3729 or brian.d.smith120.civ@health.mil.

Attachment:

- (1) DD Forms 2896-1
- (2) SSN Elimination Plan

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