



**DEFENSE HEALTH AGENCY
HEALTHCARE OPERATIONS DIRECTORATE**
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DHA Privacy
Office Review:

**MEMORANDUM FOR THE DEFENSE PRIVACY CIVIL LIBERTIES AND
TRANSPARENCY DIVISION**

SUBJECT: Justification for the Use of the Social Security Number (SSN) for TRICARE Plus Enrollment Application (DD Form 2853) and TRICARE Plus Disenrollment Request (DD Form 2854)

This memorandum is written to satisfy the requirement established by Department of Defense Instruction (DoDI) 1000.30, "Reduction of Social Security Number (SSN) Use within DoD," dated August 1, 2012, that requires justification for the collection and use of the SSN on department Forms. This justification pertains to the updated TRICARE Plus Enrollment Application (DD Form 2853) and TRICARE Plus Disenrollment Request (DD Form 2854) forms, which are included as Attachment A and B.

The TRICARE Plus Forms (DD Form 2853 and DD Form 2854) are used to collect personally identifiable information (PII) into a system of records under the Privacy Act of 1974. The Form is covered by System of Records Notice DMDC 02 DoD, Defense Enrollment Eligibility Reporting Systems (DEERS) (July 27, 2016, 81 FR 49210). DMDC 02 DoD is included as Attachment C.

The TRICARE Plus Forms (as referenced above) are DoD forms completed by beneficiaries to formally enroll in, change, or terminate their coverage in the TRICARE Plus program. The forms request either the SSN or DoD Benefits Number (DBN) of the sponsor. DD Form 2853 is used by individuals to apply for TRICARE Plus and DD Form 2854 is used by individuals to request disenrollment from TRICARE Plus. TRICARE Plus is a program offered by some military treatment facilities (MTFs) to those already eligible for TRICARE Standard, TRICARE Extra, TRICARE Standard Overseas, or TRICARE for Life. Dependent parents and parents-in-law are also eligible for TRICARE Plus. Enrollees are assigned a primary care provider stationed at a MTF and are expected to utilize that provider for all non-emergency primary care.

Regional Managed Care Support Contractors (MCSCs) are required to enter the information contained in the Form into the Defense Enrollment Eligibility Reporting System (DEERS) using the Defense Online Enrollment System (DOES) application, which will reflect the beneficiary-requested enrollment status. Historically, the SSN has been the primary identifier to update an enrollment, change or termination using the DOES application and this is still the current process. The Defense Manpower Data Center Privacy Impact Assessment for DEERS, dated 12/02/2015, is included as Attachment C. The Defense Information Technology Portfolio Repository (DITPR) number for DEERS is 1391.

For the continued collection of SSNs under DoDI 1000.30, the Department's use of SSNs

must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use Cases applicable to the TRICARE Plus Forms (as referenced above) are Paragraph 2.c.(4), Interactions With Financial Institutions, and Paragraph 2.c.(11), Legacy System Interface.

Acceptable Use Case 2.c(4) permits SSN collection where it may be necessary to have an individual's SSN "for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions." Financial institutions with which electronic payment methods are established (Section VI of Attachment A) may request the applicant's SSN or last four SSN digits to validate the establishment of an electronic payment method on behalf of the applicant.

Further, MCSCs must input the information on the Form into DOES, which has historically used the SSN as the primary identifier. Though DOES is able to use both the SSN and DBN as the primary identifier, eliminating the collection of the SSN altogether would not be feasible at this time.

Even though DoD has made efforts to inform TRICARE beneficiaries of their DBNs and encourage use of DBNs in lieu of SSNs on forms and other information collections where SSNs are not otherwise necessary, some beneficiaries remain unaware of their sponsors' DBN. However, TRICARE beneficiaries are aware of their sponsor's SSN, which has historically been collected by multiple DoD agencies to confirm available benefits. Therefore, the DBN is not always sufficient as the sole primary identifier permitted on the TRICARE Plus Forms (as referenced above) or in connection with the DOES application interface with DEERS.

For these reasons, DD Form 2853 and DD Form 2854 continue needing to collect the SSN for at least some individuals and circumstances under the Acceptable Use Cases found in Paragraphs 2.c.(4) and 2.c.(11).

If there are questions, my point of contact is Ms. Shane Pham, who may be reached at shane.m.pham.civ@mail.mil, or by phone at (703) 681-8666.

Kathleen K. Larkin
Chief, Health Plan Execution & Operations Division

Attachments:
As stated