



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

July 9, 2024

MEMORANDUM FOR DEFENSE HEALTH AGENCY (DHA), PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of Social Security Numbers (SSNs) on DD Form 3043, TRICARE Select Enrollment, Disenrollment, and Change Form

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 3043, TRICARE Select Enrollment, Disenrollment, and Change Form (Enclosure 1).

The DD Form 3043 collects data, including SSN, on individuals seeking to enroll, change, or terminate their coverage in the TRICARE Select health plan. The TRICARE Select health plan is a fee-for-service plan available to eligible retirees and all eligible family members as indicated in the Defense Enrollment Eligibility Reporting System (DEERS). Each individual seeking to enroll in or change their enrollment status in the TRICARE Select is requested to provide either the SSN or Defense Benefits Number (DBN) of the individual applicant and the sponsor.

The completed DD Form 3043 is sent to the appropriate regional Managed Care Support Contractor (MCSC) to manage the enrollment status of the beneficiaries. First, the MCSC puts the information from the DD Form 3043 into the DEERS using the Defense Online Enrollment System (DOES) web-based application. The information is then manually inputted into the MCSC database. The system of records notice applicable to DD Form 3043 is DMDC 02 "Defense Enrollment Eligibility Reporting Systems (DEERS)."

In accordance with DoDI 1000.30, continued use of SSNs within DD 3043 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 TRICARE Select 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.

When feasible, the premiums for TRICARE Select are paid on a monthly recurring basis either through credit card or electronic funds transfer through the applicant's financial institution. Though the TRICARE Select program accepts other forms of payment, monthly recurring allotment is mandated where feasible, according to the National Defense Authorization Act for Fiscal Year 2020, Section 702. The

information collected on the DD Form 3043, 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, TRICARE Select premiums cannot be paid upon enrollment.

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 3043 is entered 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.

Many of the categories listed include members eligible for TRICARE Select. Until such time as all beneficiaries are informed and aware of their DBN, the SSN will continue to be needed on DD Form 3043 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.

My point of contact for questions related to this memorandum is Ms. Zelly Zim, who may be contacted at 703-828-5256 or zelly.1.zim.civ@health.mil.

Approved - Exp 9 Jul 27

Richard C. Hart
Chief, Health Plan Design Division

Enclosure:
As stated