

Information Collection 0938-0977
CMS 10170
Additional Information

Is personally identifiable information being collected?

Yes

Is the SSN being collected?

Yes. We collect SSNs of all individuals associated with the on-line application, including those who prepare payment requests and submit payment requests. This is necessary to protect the RDS Plan Sponsors, to ensure that only authorized individuals may gain access to the Plan Sponsor's RDS account. Validation through an individual's SSN is a reliable method of validation. Further, this information is also needed to conduct background checks on these individuals to make sure that they are not on the GSA debarment list or the HHS OIG exclusion list. In order to safeguard the Medicare Trust Fund and other taxpayer money, we must restrict access to the RDS Program for those individuals who have a prior history of defrauding the Federal government. The SSN provides the most reliable data to match individuals to those lists. We have authority to collect SSNs pursuant to the Debt Collection Improvement Act at 31 USC 7701(c)(2).

If we cannot collect the SSN as a data element, we risk loss to the Medicare Trust Fund, as well as unauthorized access to Plan Sponsors' RDS applications/accounts. We did not consider any alternative data elements, as there are no suitable ones available that could be used to effectively safeguard the Medicare Trust Fund.