

## Justification for Collecting SSNs

- **Is personally identifiable information being collected?**

Yes, there is personally identifiable information being collected.

- **Is the SSN being collected?**

Yes, the SSN is being collected.

- **Is the information being collected electronically?**

No information is being collected electronically.

- **Why do you need to use the SSN?**

The SSN is required to assure individuals with similar names are accurately identified and properly processed. In addition, Form L-564 is completed by the employer to confirm employer group health plan coverage for the individual now enrolling in Medicare Part B. This individual may not be the same person that worked for the company; it could be a family member or spouse. The SSN is used to identify spousal and Social Security Title II benefits relationship for eligibility for a Special Enrollment Period.

- **What will happen if you cannot use the SSN as a data element?**

If the SSN is not used, the Federal Government will not be able to properly identify individuals, resulting in the denials of enrollments using legislated Special Enrollment Periods.

- **Explain alternative data elements considered and why you do not consider them suitable replacements for the SSN.**

The Social Security Administration uses the SSN to determine Title II benefits for which Medicare entitlement is derived. Presently, there are no other suitable replacements.

- **What are the costs associated with alternatives?**

N/A