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May 9, 2025

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) on DD2876, TRICARE Prime Enrollment, Disenrollment and Primary Care Manager (PCM) Change Form

This memorandum is to satisfy the requirements of the *Department of Defense Instruction* (DoDI) 1000.30, 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 DD2876, TRICARE Prime Enrollment, Disenrollment and Primary Care Manager (PCM) Change Form (Enclosure 1).

The DD Form 2876, collects data, including SSN, on individuals seeking to enroll, change, or terminate their coverage in the TRICARE Prime health plan or change their PCM. The TRICARE Prime health plan is a managed care option available in Prime Service Areas and available to Active Duty Service Members, retirees, and eligible family members as indicated within the Defense Enrollment Eligibility Reporting System (DEERS). Individuals seeking to enroll or change their enrollment status in TRICARE Prime are requested to provide either their SSN or Defense Benefits Number (DBN) of the individual applicant or their sponsor.

The completed DD Form 2876 is sent to the Private Sector Care Support Contractor (PSCSC) to manage enrollment and PCM status of the beneficiaries. The PSCSC will first put the information from the DD Form 2876 into the DEERS using the Defense Online Enrollment System (DOES) web-based application. The information is then manually input into the PSCSC database. The system of records notice applicable to DD Form 2876 is DMDC 02, "Defense Enrollment Eligibility Reporting Systems (DEERS)."

In accordance with DoDI 1000.30, continued use of SSNs within DD 2876 must be justified by one or more of the Acceptable Use Cases set forth in DoDI 1000.30, Enclosure 2. The Acceptable Use applicable to TRICARE Prime are as follows:

Acceptable use 2.c.(4) Interactions with Financial Institutions applies because 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.

The premiums for TRICARE Prime are paid on a monthly recurring basis either through allotment, credit card, or electronic funds transfer through the applicant's financial institution. The information collected on the DD Form 2876, including the SSN, may be requested by the financial institution to establish and validate the electronic payment method. As such without the provision

of the SSN, TRICARE Prime premiums cannot be paid upon enrollment. Of note, though not established through the form, recurring electronic payments may be set up for premiums thereafter.

Acceptable use 2.c.(11) Legacy System Interface 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 time period, 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 2876 is input 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.

Until such time as all beneficiaries are informed and aware of their DBN, the SSN will continue to be needed on DD Form 2876 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 Military Health System cannot mitigate the lack of the DoD Benefits Number on Uniformed Services ID Cards – only the military personnel community can.

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.

The DHA Component/Office point of contact for this program is Ms. Shane Pham, who may be contacted at (703) 275-6249 or shane.m.pham.civ@health.mil.

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Enclosures: As stated

Approved