

ADDITIONAL INFORMATION

a. Safeguarding personally identifiable (PII) information in the possession of the government and preventing its breach is essential. All CMS systems that collect and/or store PII must be covered by a Privacy Impact Assessment (PIA). **Please respond to all of the following questions:**

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

Is the SSN being collected? Yes, the SSN is being collected.

- **Is the information being collected electronically?**
 - a. **If yes, what is the name of the electronic system?**

b. **Is there a privacy impact assessment (PIA) for this collection?** Yes, there is a PIA for this collection.

- **If there is not a PIA associated with either/both electronic system(s), please provide the date when the PIA(s) will be complete.** N/A

If you have questions about privacy impact assessments, contact Maribel Franey, Director Division of Privacy Compliance, Office of Information Services.

b. Social Security numbers (SSN) may NOT be collected unless it is absolutely necessary (e.g., a statutory requirement). If you believe your collection must collect SSNs, you must provide the rationale for using the SSN as a data element. Please make sure to list and explain any public law, U.S. Code, Executive Order, or statute that mandates or authorizes the use of the SSN. **Please respond to all of the following questions:**

Why do you need to use the SSN? The SSN is required to ensure that individuals with similar names are accurately identified and properly processed. In addition, the SSN is used to access their earnings systems to determine if the applicant is eligible for or entitled to premium-free Part A.

- **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.
- **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