

Justification for Collecting Social Security Numbers (SSN) and Additional Information

Form title: CMS-4040 Request for Enrollment for Medicare Part B (Medical Insurance)

OMB#: 0938-0245

Why the SSN Needs to be Collected

Under §205(c)(1) of the Social Security Act, the Commissioner of the Social Security Administration (SSA) is required to establish and maintain records of wages paid to each individual and amounts of self-employment income. These earnings records determine an individual's (and/or their dependent's or survivor's) eligibility for and the amount of Social Security benefits, as well as eligibility for Medicare.

To accomplish this, the SSA assigns SSNs to all individuals, including:

- Applicants for or recipients of any federally funded program (e.g., Social Security, Supplementary Security Income, Medicare)
- Aliens lawfully present in the United States
- Children

The SSN serves as the primary record identifier for applicants and recipients of Social Security and/or Medicare benefits. Specifically, it is required to:

- Accurately identify individuals with similar names and ensure proper processing
- Identify spousal and Social Security Act Title II benefits relationships for eligibility determination
- Verify eligibility for premium-free Hospital Insurance (Part A) and Supplementary Medical Insurance (Part B)
- Access earnings systems to determine entitlement to premium-free Part A

What Happens if the SSN is not Collected

If the SSN is not used as a data element, the Federal Government will be unable to:

- Properly identify individuals
- Verify eligibility based on earnings records
- Process enrollments accurately

This would result in the denial of Part A and Part B enrollments.

Alternative Data Elements Considered

The SSA uses the SSN to determine Title II benefits from which Medicare entitlement is derived. Currently:

- There are no suitable replacement identifiers
- CMS does not obtain or process applications for Social Security or Medicare benefits directly, and therefore cannot assign an alternative identifier at the time of application

Costs Associated with Alternatives

N/A — No viable alternatives have been identified; therefore, no cost analysis is applicable.

Additional Privacy & PII Considerations

Question	Response
Is PII being collected?	Yes
Is the SSN being collected?	Yes
Is information collected electronically?	Yes
Is there a Privacy Impact Assessment (PIA)?	Yes
PIA completion date (if not yet complete)	N/A

Note: All CMS systems that collect and/or store Personally Identifiable Information (PII) must be covered by a Privacy Impact Assessment (PIA). For questions regarding PIAs, contact the Director, Division of Security & Privacy Compliance, Office of Information Technology.