

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 following questions:**

1. **Is personally identifiable information being collected?** Yes.
2. **Is the SSN being collected?** Yes.
3. **Is the information being collected electronically?** No.
 - a. If yes, what is the name of the electronic system? N/A
 - b. Is there a privacy impact assessment (PIA) for this collection? Yes.
4. **Is the information stored electronically?** Yes.
 - a. If yes, what is the name of the electronic system? SSA systems
 - b. Is there a privacy impact assessment (PIA) for this collection? Yes.
5. **If there is not a PIA associated with either/both electronic system(s), please provide the date when the PIA(s) will be complete.**

For questions about privacy impact assessments, contact Shawnte Singletary, Director of Division of Security and Compliance (DSPC).

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 following questions:**

1. **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 coverage based on ESRD.

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

If the SSN is not used, the Medicare Beneficiary Identifier (MBI), referred to as the Medicare number on the CMS-43, can be used to identify individuals. If neither identifier is available, the Federal Government may be unable to properly verify identity, which could result in the denial of enrollment.

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

The Medicare Beneficiary Identifier (MBI), referred to as the Medicare number, is an acceptable alternative to the SSN when it is available, as it can be used to identify individuals already enrolled in Medicare. However, if the MBI is not available, the SSN remains the only acceptable data element. This is because the Social Security Administration relies on the SSN to determine Title II benefits, from which Medicare entitlement is derived. At present, no other data elements provide a suitable replacement for establishing and verifying this eligibility

4. **What are the costs associated with alternatives?**
N/A