

[redacted]
January 18, 2007

Comment to the President's Identity Theft Task Force

This comment proposes changing Medicare identifying numbers from the Social Security Number ("SSN") to another number and suggests resources for the Social Security Administration to use to determine how to change this identifier. The comment also suggests that the Task Force's educational efforts encourage consumers to question requests for personally identifiable information and, where appropriate, decline to provide such information.

As the Interim Recommendations of the Task Force suggest, consumers should safeguard their SSNs to avoid becoming victims of identity theft. The Task Force recommends that consumers not carry their Social Security Cards with them. It also recommends that consumers take further measures to safeguard this number.

However, once a consumer becomes eligible for Medicare coverage, their SSN is widely disseminated because it is, in effect, their Medicare number/identifier. Moreover, these consumers need to carry their Medicare card to prove Medicare coverage at doctor's offices, drug stores, hospitals and other providers. The SSN must be given to medical and drug providers to obtain payment from Medicare. In addition, the SSN is often used as the file number in medical offices and hospitals. These files contain in one place all of the information necessary to facilitate identity theft, i.e., name, address, birth date, and SSN. The computer systems, and therefore the security of the information, used by these entities are often neither sophisticated nor up-to-date.

Until a consumer is eligible for Medicare coverage, he or she can refuse to allow the SSN to be used for such records. However, once the consumer wishes to use his or her Medicare coverage, that choice is taken away from them. Removing the ability to protect the SSN leaves one of our most vulnerable populations completely defenseless to prevent identity theft through misuse of their Medicare identifier.

Until the last few years, many hospitalization insurance plans used the SSN as the identifier. However, these entities as well as state motor vehicle departments and other entities, have managed to change the identifiers to something other than the SSN. The Department of Health and Human Services should consult these entities to determine what systems the entities have used to convert to non-SSN identifiers and examine what problems these entities have encountered in developing unique identifiers. For example, the Motor Vehicle Administration of Maryland uses something called a soundex system.

If the Task Force accomplishes only the change in Medicare identifiers, it will have substantially deterred identity theft.

2. Sensitize Consumers to Question Requests for Personal Information

In its educational efforts, the Task Force should seek to sensitize consumers generally to protect their personal information in all situations. When asked for any personally identifiable information, consumers should always question why they need to provide the information for a particular transaction. The consumer can then determine whether it is appropriate to decline to provide the information. Consumers need to be able to feel comfortable declining to provide information.

Please feel free to contact me if you require additional examples or information.

Very truly yours,

[redacted]