Social Security Number Policy

Background: In accordance with Section 7 of the Privacy Act of 1974 (Disclosure of Social Security Number), unless the disclosure is required by Federal statute, applicant may not be denied any right, benefit or privilege provided by law because of the individual’s refusal to disclose his/her Social Security Number (SSN). Disclosure of an individual’s SSN pursuant the Internal Revenue Code where it is used as the identifying number for the purposes of a return, statement or any other document under the Code (i.e. for payment of wages for OJT, Work Experience, etc.) may be properly required. Applicants who do not possess a Social Security card must apply for one to ensure that a copy of that card may be placed in the applicant file.

Scope: This policy applies to all service providers operating WIOA Title I programs and WIOA Title I program manager(s). This policy is effective (insert date upon SWIB approval).

Policy:

Obtaining Social Security Numbers

- Although an applicant cannot be denied WIOA services for failure to disclose their SSN, they must submit their SSN in order to receive wages paid while participating in WIOA (i.e. OJT).
- Service providers must request a client’s SSN when offering intensive WIOA services or providing financial assistance, however the service provider may not deny access to any client who refuses to provide a SSN. Not obtaining an SSN from a client means that any outcomes for this client would be excluded from performance measures unless supplemental information is available to verify the performance outcomes for non-wage based measures.
- Service providers must request the applicant’s SSN at intake and advise them that their SSNs are maintained in a secure and confidential manner. Applicants must also be advised the State only uses the SSN for the following:
  - Payment of wages and allowances, even though at intake it may not be possible to determine the form of payment, if any, the applicant will receive; and
  - Tracking Unemployment Insurance wage records for the calculation of program performance measure outcomes.
- A valid SSN must be obtained and recorded prior to termination and record transmittal for Federal reporting requirements.
- Clients that are hesitant to have a copy of the Social Security card made by case managers may use the Verification of Documentation Form (WIOA.53). The form must be signed by the case manager and maintained in the clients’ file.
- If an applicant does not have an SSN, service providers shall allow MWorks to assign a pseudo SSN.
Monitoring and Evaluation:

- A formal monitoring will be conducted on an annual basis by the entity designated by SWIB.

References:

- TEGL 5-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers