

**Pinal County Workforce Development Board (PCWDB)
Policy Broadcast (PB)
PCWDB PB 20-1
Collection and Verification of Social Security Numbers
Effective January 19, 2021**

Policy Broadcast (PB) 20-1 provides policy to the PCWDB's service providers of the Workforce Innovation and Opportunity Act (WIOA) Title I-B Adult, Dislocated Worker and Youth Programs regarding the use, collection, and verification of Social Security Numbers (SSN) of individuals accessing these programs.

Reference: Privacy Act of 1974, Training and Employment Letter (TEGL) 05-08, TEGL 10-16, Change 1, TEGL 26-16, and TEGL 23-19.

WIOA Title I-B Adult, Dislocated Worker and Youth program enrollment is not contingent on the availability or verification of the individual's SSN.

Service providers **must not** refuse or delay enrollment in a WIOA Title I-B program or refuse to provide WIOA Title I-B services (basic career, individualized career, training services or any youth services) because the individual's SSN is unavailable, unable to be verified or the individual refuses to provide their SSN.

A. Documentation of Verification of Social Security Number

Verification means the name and SSN on the SSN documentation matches the name and partial SSN in the AJC system. When a SSN card is collected as part of "Right to Work" verification the copy of the SSN must be obtained in a separate, confidential and secure file.

When documentation of the SSN is provided, it is for verification purposes only. Service provider staff must document in case notes in the AJC system that the SSN was verified, but must not maintain verification of the SSN or upload a copy of the SSN documentation into the AJC System.

B. Non-availability of SSN for SSN Verification

Although WIOA Title I-B services are required to *request* the SSN, **the SSN is not required to be provided by the participant or verified**. When an individual's SSN is unknown, verification is not available or the participant refuses to provide their SSN and the individual meets all other WIOA Title I-B program eligibility requirements, service providers **must**:

1. Enroll the participant in the WIOA Title I-B program, and provide the individual's services identified in the Individual Employment Plan or Individual Service Strategy. The AJC system does not require SSN for registration or enrollment;
2. Inform the individual about Supplemental Wage Collection and procedures; and
3. Add a case note to the AJC system to indicate the SSN was not verified; and
4. Conduct supplemental wage data follow-up, and add supplemental wage data information into the AJC system.

C. Assistance Obtaining Documentation required for Employment

WIOA Title I-B funds may be used to assist participant's obtain a new SSN card, birth certificate, or state identification/ driver's license after enrollment in the WIOA Title I-B program as a supportive service to assist with securing employment.

D. Verification of SSN For Unemployment Insurance Wage Records Match

Wage match with Unemployment Insurance wage records is the best method for determining WIOA wage-based performance measures.

For wage matching purposes only, WIOA Title I-B service providers **must request** verification of the participant's SSN prior to providing individualized career and training services or enrollment in the youth program.

When requesting verification of the individual's social security, service providers must:

1. Explain to the participant how the social security number will be used and how a participant's privacy will be ensured.
2. Ensure that social security numbers will be maintained in a secure and confidential manner.
3. Ensure forms developed by the service provider do not require the individual's SSN.

If you have any questions regarding PCWDB's WIOA Title I-B Adult, Dislocated Worker or youth policies or requirements in this PB, email moriah.robles@pinal.gov.