



Montana Department of LABOR & INDUSTRY

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2 **Division: Workforce Services Division**
3 **Category: WIOA**
4 **Effective Date: 04/30/2018**
5 **Last Revised:**
6 **Policy No.: 07-18**

Social Security Number Policy

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

15 **Scope:** This policy applies to all service providers operating WIOA Title I programs and WIOA Title I program
16 manager(s). This policy is effective April 30, 2018 .

17 **Policy:**

18 **Obtaining Social Security Numbers**

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

39 **Monitoring and Evaluation:**

- 40 • A formal monitoring will be conducted by the entity designated by SWIB.

41 **References:**

- 42 • [TEGL 5-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers](#)