



# 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: 04/01/2022  
6 Policy No.: 07-18

## Social Security Number Policy

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9 **Background:** Montana Department of Labor & Industry (MDLI) faces the challenge of balancing the  
10 need to collect a participant's Social Security Number (SSN) for performance and reporting requirements with  
11 the obligation to limit the burden of data collection and maintain participant privacy. This policy provides  
12 clarification when service providers should request a participant's SSN for Workforce Innovation and  
13 Opportunity Act (WIOA) programs or other workforce development purposes.

14 **Scope:** This policy applies to all service providers operating WIOA Title I Adult, Dislocated Worker or National  
15 Dislocated Worker Grants (DWG) and/or Youth programs. This policy is effective April 1, 2022 .

### Policy:

- 17 • Service providers must request a participant's SSN when offering the following services:
  - 18 ○ Training and education services; and
  - 19 ○ Co-enrollment in a program that offers training services or provides financial assistance, i.e. a  
20 Trade Adjustment Assistance (TAA) relocation allowance.
- 21 • Service providers will advise participants that their SSNs are maintained in a secure and confidential  
22 manner. Applicants will also be advised that MDLI only uses the SSN for the following:
  - 23 ○ Payment of wages and allowances, even though at intake it may not be possible to determine  
24 the form of payment, if any, the applicant will receive; and
  - 25 ○ Tracking Unemployment Insurance wage records for the calculation of program performance  
26 measure outcomes.
- 27 • An individual may refuse to provide a SSN and still be eligible to participate in WIOA programs. If an  
28 applicant does not have an SSN, service providers will allow the Management Information System (MIS)  
29 to assign a pseudo SSN.

### Monitoring and Evaluation:

- 31 • A formal monitoring will be conducted by the entity designated by SWIB.
- 32 • WSD's Monitoring Team and Reporting Analyst will provide technical assistance.

### References:

- 34 • [TEGL 5-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers](#)
- 35 • [Social Security P.L. 93-579 Privacy Act of 1974](#)
- 36 • [TEGL 26-16 Supplemental Wage Information to Implement the Performance Requirements under WIOA](#)