Social Security Number Policy

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

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

Policy:

- Service providers must request a participant’s SSN when offering the following services:
  - Training and education services; and
  - Co-enrollment in a program that offers training services or provides financial assistance, i.e. a Trade Adjustment Assistance (TAA) relocation allowance.

- Service providers will advise participants that their SSNs are maintained in a secure and confidential manner. Applicants will also be advised that MDLI 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.

- An individual may refuse to provide a SSN and still be eligible to participate in WIOA programs. If an applicant does not have an SSN, service providers will allow the Management Information System (MIS) to assign a pseudo SSN.

Monitoring and Evaluation:

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

References:

- TEGL 5-08 Policy for Collection and Use of Workforce System Participants' Social Security Numbers
- TEGL 26-16 Supplemental Wage Information to Implement the Performance Requirements under WIOA