

Date: April 19, 2021 Number: WSD20-11



# PSEUDO SOCIAL SECURITY NUMBER IN CalJOBS<sup>SM</sup>

#### **EXECUTIVE SUMMARY**

This policy provides the guidance and establishes the procedures regarding the use of pseudo Social Security Numbers (SSNs) in CalJOBS for the following programs: Title III Wagner- Peyser, Trade Adjustment Assistance (TAA), National Farmworker Jobs Program (NFJP), and Title I *Workforce Innovation and Opportunity Act* Adult, Dislocated Worker and Youth. This policy applies to Local Workforce Development Area (Local Area) and Employment Development Department (EDD) staff, and is effective immediately.

This policy contains only state-imposed requirements.

This Directive finalizes Workforce Services Draft Directive *Pseudo Social Security Number in CalJOBS* (WSDD-221), issued for comment on December 24, 2020. The Workforce Development Community submitted 10 comments during the draft comment period. A summary of comments, including all changes, is provided as Attachment 4.

This policy supersedes Workforce Services Information Notice *Pseudo Social Security Number Process in CalJOBS* (WSIN12-37), dated March 7, 2013. Retain this Directive until further notice.

### REFERENCES

- WIOA (Public Law 113-128) (PDF)
- Title 20 *Code of Federal Regulations* (CFR) Part 603: "Federal-State Unemployment Compensation (UC) Program; Confidentiality and Disclosure of State UC Information" Sections 603.20, 603.21, 603.22, 603.23
- Title 20 CFR Part 666: "Performance Accountability Under Title I of the Workforce Innovation and Opportunity Act" Sections 677.175
- Training and Employment Guidance Letter (TEGL) 14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL) (March 25, 2019)

The EDD is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

- TEGL 07-18, Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (December 19, 2018)
- TEGL 26-16, Guidance on the use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act (June 01, 2017)
- TEGL 05-08, Policy for Collection and Use of Workforce System Participants' Social Security Numbers (November 13, 2008)

## BACKGROUND

As part of the performance reporting process, the DOL encourages states to collect an individual's SSN so a wage record match can be completed. In addition to this requirement, CalJOBS utilizes the SSN as a unique identifier to assist with the administration of Unemployment Insurance (UI) programs, and reduce duplication of records in the system. The CalJOBS system will not allow an individual to register an account with a duplicate or alphanumeric SSN. Local Area Management Information System (MIS) Administrators and EDD Field Division Supervisors have the privilege to edit SSNs in the CalJOBS system, as well as create individual registrations with a pseudo SSN. Individuals are not able to assign themselves a pseudo SSN during self-registration.

## POLICY AND PROCEDURES

### Definitions

*Valid SSN* – a 9 digit unique number issued to an individual by the Social Security Administration (SSA).

*Pseudo SSN* – a dummy SSN issued at the request of an individual, or if there is an issue with a duplicate SSN in CalJOBS.

Duplicate SSN – an SSN that already exists in CalJOBS.

*Incorrect SSN* – an SSN that was not assigned to the individual as a pseudo SSN and is not a valid SSN assigned to the individual by the SSA.

## Pseudo SSNs

Individuals are not required to provide their SSN in order to receive employment or training services, unless they are UI or TAA recipients. If UI assigned the individual an EDD Client Number, refer the individual to UI to update their SSN for their UI claim.

Individuals should be informed that their SSN is secure in the CalJOBS system. If the individual refuses to provide their SSN, Local Area MIS Administrators and EDD Supervisors can assign create a CalJOBS account with a pseudo SSNs on behalf of the individual with the

understanding that a program participant with a pseudo SSN will not be included in the wage records matching process, and supplemental data will need to be collected for performance and reporting purposes.

Pseudo SSN numbering conventions should be followed and are found in Attachment 1 for Local Areas and Attachment 2 for the EDD Divisions. Instructions on how to assign a pseudo SSN to an unregistered individual in CalJOBS are found in Attachment 3.

In an effort to avoid the rekeying of an already assigned pseudo SSN, each Local Area and EDD Division is encouraged to maintain a master list of the assigned pseudo SSNs. If a pseudo SSN has already been used in CalJOBS, continue to follow the pseudo SSN template and change the last four digits until a new pseudo SSN can be assigned.

### **Duplicate SSNs**

When an SSN already exists in the CalJOBS system at the time the individual registers, staff are required to verify the individual's identity using documentation from the SSA and a valid State or Federal photo identification. Once verified, the unverified individual's SSN must be reassigned to a pseudo SSN. A case note should be added explaining the reason for updating the SSN. Once the duplicate SSN has been reassigned, the individual with the verified SSN can immediately register in the CalJOBS system using their valid SSN.

If an individual contacts EDD or Local Area staff stating their account has been moved to a pseudo or incorrect SSN, inform the individual that staff have verified the SSN belongs to another individual with documents from the SSA. Refer this individual to the SSA for possible identity theft.

Instructions on how to reassign a duplicate SSN in CalJOBS can be found in Attachment 3.

### Amending Incorrect SSNs

If an individual previously registered in CalJOBS using an incorrect SSN and would like to update their SSN, staff are required to verify the individual's identity using documentation from the SSA and a valid State or Federal photo identification. Once verified, the individual's SSN may be updated in CalJOBS. A case note should be added explaining the reason for updating the SSN.

Instructions for updating incorrect SSNs in CalJOBS is found in Attachment 3.

## ACTION

Bring this Directive to the attention of all affected parties.

## INQUIRIES

If you have any questions, contact your Regional Advisor.

/s/ JAIME L. GUTIERREZ, Chief Central Office Workforce Services Division

Attachments:

- 1. Pseudo SSN Numbering Conventions for Local Areas (DOCX)
- 2. Pseudo SSN Numbering Conventions for EDD Divisions (DOCX)
- 3. Instructions for Pseudo SSNs in CalJOBS (DOCX)
- 4. Summary of Comments (DOCX)