#### WORKFORCE INVESTMENT BOARD OF TULARE COUNTY

# DATE:

August 11, 2021

## **SUBJECT:**

Pseudo Social Security Number in CalJOBS

# WORKFORCE INNOVATION AND OPPORTUNITY ACT TITLE I

#### WIB DIRECTIVE

**TUL 21-05** 

APPROVED BY WORKFORCE INVESTMENT BOARD MINUTES OF 08-11-2021

**TO:** WIB Subrecipients

WIB Staff

SUBJECT: PSEUDO SOCIAL SECURITY NUMBER IN CALJOBS

## **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 state-imposed requirements.

This directive also contains WIB-imposed requirements. WIB imposed requirements are indicated *by bold and italics*.

#### **REFERENCES:**

- WIOA (Public Law 113-128) (PDF)
- <u>Title 20 Code of Federal Regulations</u> (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
- <u>Training and Employment Guidance Letter (TEGL) 14-18</u>, 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)
- <u>TEGL 07-18</u>, Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act (December 19, 2018)
- <u>TEGL 26-16</u>, Guidance on the use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act (June 01, 2017)
- <u>TEGL 05-08</u>, Policy for Collection and Use of Workforce System Participants' Social Security Numbers (November 13, 2008)
- WSD 20-11, Pseudo Social Security Number in CalJOBS, April 19, 2021

#### **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 and create a CalJOBS account with a pseudo SSN 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. Instructions on how to assign a pseudo SSN to an unregistered individual in CalJOBS are found in Attachment 2.

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 WIB 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 2.

## **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 2.

## **WIB Subrecipient Policy and Procedures**

## WIB Subrecipient Instructions to Request a Psuedo SSN

A supervisor from the subrecipient must send an encrypted email request for a pseudo SSN for an individual to the WIB MIS Administrator. The request should include the individual's name and birthdate (MM/DD/YY). The MIS Administrator will assign the pseudo SSN and email it to the supervisor for staff to enter in CalJOBS.

The WIB MIS Administrator will maintain a secure master list of assigned pseudo SSNs.

Subrecipients should notify the WIB MIS Administrator if a participant's SSN is subsequently verified and the pseudo SSN is replaced with the valid SSN in CalJOBS.

# WIB Subrecipient Instructions to Request Reassignment of a Duplicate SSN

The WIB subrecipient staff must first verify an individual's identity before supervisory staff sends an encrypted email to the WIB MIS Administrator requesting the duplicate unverified SSN be assigned a pseudo SSN. The request should include the individual's name and the last four digits of SSN in CalJOBS. Then, the MIS Administrator will assign and enter the Pseudo SSN to the individual.

## WIB Subrecipient Instructions to Amend Incorrect SSNs.

When an incorrect SSN has been verified a supervisor from the subrecipient can update to the correct SSN in CalJOBS.

<b>ACTION</b>	:
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Please bring this directive to the attention of all WIB Subrecipients and WIB Staff.

## **INQUIRIES:**

Please direct inquiries regarding this directive to the WIB at (559) 713-5200.

ADAM PECK Executive Director

AP:sw:lc

## **ATTACHMENTS:**

EDD Pseudo SSN Numbering Conventions for Local Areas (DOCX)
EDD Instructions for Pseudo SNNs in CalJOBS (DOCX)

E:\Analyst-Program\Directives\Pseudo SSN\Pseudo SSN Directive final.docx

# **Pseudo SSN Numbering Convention for Local Areas**

Management Information System (MIS) Administrators will assign pseudo Social Security Numbers (SSNs) for their Local Workforce Development Areas (Local Areas) following the pseudo SSN template for their Local Area. The following table provides examples of the Pseudo SSN template for each Local Area for an individual with a birthdate of January, 30, 1962.

Pseudo SSN Template: 9XX (Local Area's assigned 900-series identifier) – DD (individual's birthdate) – MMYY (Individual's birth month and the last two digits of the birth year)

Local Area	900 Series Identifier	Example Pseudo SSN
Alameda County	940	940-30-0162
Anaheim City	941	941-30-0162
Contra Costa	942	942-30-0162
Foothill	943	943-30-0162
Fresno County	944	944-30-0162
Golden Sierra Consortium	945	945-30-0162
Humboldt County	946	946-30-0162
Imperial County	947	947-30-0162
Employers Training Resource (KIM)	948	948-30-0162
Kings County	949	949-30-0162
Los Angeles City	950	950-30-0162
Los Angeles County	951	951-30-0162
Madera County	952	952-30-0162
Merced County	955	955-30-0162
Monterey County	956	956-30-0162
Mother Lode Consortium	957	957-30-0162
NoRTEC Consortium	959	959-30-0162
Workforce Alliance of North Bay	958	958-30-0162
North Central Counties (NCC)	960	960-30-0162
NOVA	961	961-30-0162
Oakland City	962	962-30-0162
Orange County	963	963-30-0162
Pacific Gateway/Long Beach	964	964-30-0162
Richmond City	965	965-30-0162
Riverside County	966	966-30-0162
Sacramento Employment & Training	967	967-30-0162
San Benito County	968	968-30-0162
San Bernardino County	970	970-30-0162
San Diego Consortium	971	971-30-0162
San Francisco	972	972-30-0162
San Joaquin County	973	973-30-0162

Local Area	900 Series Identifier	Example Pseudo SSN
San Jose/Silicon Valley	974	974-30-0162
San Luis Obispo County	975	975-30-0162
Santa Ana City	977	977-30-0162
Santa Barbara County	978	978-30-0162
Santa Cruz County	979	979-30-0162
SELACO	980	980-30-0162
Solano County	981	981-30-0162
Sonoma County	982	982-30-0162
South Bay Consortium	983	983-30-0162
Stanislaus County	984	984-30-0162
Tulare County	985	985-30-0162
Ventura County	986	986-30-0162
Verdugo Consortium	987	987-30-0162
Yolo County	988	989-30-0162

# Instructions for Pseudo SSNs in CalJOBS<sup>SM</sup>

## How to Assign a Pseudo Social Security Number (SSN) to an Individual

- 1. Go to CalJOBS Left navigation menu.
- 2. Select 'Manage Individuals.'
- 3. Select 'Create an Individual.'
- 4. Begin registering the individual by completing the registration wizard.
- 5. Assign a pseudo SSN according to Local Workforce Development Area (Local Area) or Employment Development Department (EDD) pseudo SSN numbering conventions.
- 6. Click 'Next' at the bottom of the screen.
- 7. The individual's record will state "Individual has not provided a valid SSN."
  - a. NOTE: If this statement does not immediately populate on the screen, finish the individual's registration and search for the individual using the instructions for updating a SSN. Verify that the pseudo SSN populated for the individual.
- 8. Complete the individual's registration.
- 9. Update the individual's case notes stating the reason for assigning a pseudo SSN.

## How to Reassign a Duplicate SSN

- 1. Go to CalJOBS Left Navigation menu.
- 2. Select 'Manage Individuals.'
- 3. Select 'Assist an Individual.'
- 4. Search for the individual using the individual's SSN.
- 5. Verify that you are working with the correct SSN (unverified individual's record).
- 6. Click the 'Username.'
- 7. Click 'My Individual Profiles.'
- 8. Click 'Personal Profile.'
- 9. Under 'Staff Information' click on 'View/ Edit SSN.'
- 10. Update the unverified individual's SSN to a pseudo SSN according to the Local Area or EDD pseudo SSN numbering conventions.
- 11. Update the unverified individual's case notes stating the reason for reassigning the SSN.
- 12. Inform the verified individual that they can now register in CalJOBS using their valid SSN.

## **How to Update an Incorrect SSN**

- 1. Go to CalJOBS Left navigation menu.
- 2. Select 'Manage Individuals.'
- 3. Select 'Assist an Individual.'
- 4. Search for the individual using any of the search parameters listed on the screen.
- 5. Verify that you are working with the correct individual.
- 6. Click the individual's 'Username.'
- 7. Click 'My Individual Profiles.'
- 8. Click 'Personal Profile.'
- 9. Under 'Staff Information' click on 'View / Edit SSN.'
- 10. Update the individual's SSN.
- 11. Update the individual's case notes stating the reason for updating the SSN.