



**NORTH CAROLINA DEPARTMENT OF COMMERCE
DIVISION OF WORKFORCE SOLUTIONS**

DWS Operational Guidance Number: OG 25-2021

Date: September 14, 2021

Subject: Pseudo Social Security Numbers (SSNs)

From:

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Assistant Secretary for Workforce**

Purpose: To provide guidance that establishes the procedures regarding the use of Pseudo SSNs for performance reporting of participants enrolled in Workforce Innovation and Opportunity Act (WIOA) and Trade Adjustment Assistance (TAA) programs.

Background: The U.S. Department of Labor Employment & Training Administration issued Training and Employment Guidance Letter (TEGL) 14-18, which provides guidance to states regarding the collection of participants' SSNs when enrolling in employment and training services. Local NCWorks Career Center staff are required to "request" an individual's SSN at program enrollment but cannot deny services if he or she chooses not to disclose it.

Local Area Workforce Development Boards (WDBs) must use the mechanism provided by the Division of Workforce Solutions (DWS) to create Pseudo SSNs. DWS has created a web page that will provide a Pseudo SSN generator to utilize in the provision of a random Pseudo SSN, when needed. The Pseudo SSN will be generated based on the WDB number and can be accessed at <https://public.ncworks.gov/PSSN/>. The Pseudo SSN Generator will verify that the SSN is not already in use before it is provided to the user.

TAA for Workers or Co-enrolled Dislocated Workers

Although TAA is one of the non-core programs that cannot deny service if a valid SSN is not provided, in order to receive Trade Readjustment Allowances (TRA), an individual must be TAA eligible and provide his or her actual SSN. (TEGL 14-18, page 18 and Attachment 10, page 5).

Unemployment Insurance Claims (UICs)

UICs will require an individual to use an actual SSN in order to file his or her weekly UIC.

Required SSN Notification

When requesting a WIOA eligible individual's SSN, the individual must be informed, in writing, of the following, as applicable, to the particular program:

1. Authority: The statute, regulation, Executive Order, or other authority under which the SSN is solicited. In general, the authority for collecting individuals' SSNs is found in the WIOA and the regulations implementing WIOA.
2. Purpose: The information may be used by additional government agencies that have access to the SSN if required by law.
3. Opportunity and/or right to decline to provide SSNs: SSN disclosure must be voluntarily provided by the individual.
4. Consequences of refusing or failing to disclose one's SSN: Grantees cannot deny the individual access to services if the SSN is not provided. In such instances, the individual will be identified by an alternate unique identifier or Pseudo SSN. Grantees must follow appropriate practices in collecting, storing, handling, and transmitting Personally Identifiable Information (PII). DWS only sends unique identifier numbers to U.S. Department of Labor (USDOL), never an actual SSN. This unique identifier is separate from a Pseudo SSN.

For further guidance, reference TEGL No. 39-11, Guidance on the Handling and Protection of PII (https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872).

Action: Local Area WDBs and all contractor staff are to follow the guidelines and procedures outlined in this operational guidance in the provision of Pseudo SSNs to individuals who choose to not disclose his or her actual SSN. Staff may not deny employment and training services.

Effective Date: Immediately

Expiration: Indefinite

Contact: Regional Analysts

Attachment: Best Practices to Utilize When Requesting SSNs in the NCWorks Career Center

Best Practices to Utilize When Requesting SSNs in the NCWorks Career Center

1. DWS recommends that a 10-key keypad be made available at check-in locations so that no one has to orally state the SSN and can key it directly into the system, if not on a staff computer.
2. DWS recommends that any kiosk/screen that is setup to allow individuals to check in is far enough away, so individuals have privacy to key SSNs on the screen.
3. Staff should never ask for SSNs to be provided out loud in a public setting where it could be overheard by others.
4. If an individual does not want to provide his or her SSN, a Pseudo SSN should be created. The Local Area WDB will use <https://public.ncworks.gov/PSSN/> to create a Pseudo number.
5. Individuals who are enrolled with a Pseudo SSN will still be included in WIOA performance. Thus, he or she should be informed that it will be necessary for him or her to provide employment verification for Quarters Two and Quarters Four.

Note: Pseudo SSNs are numbers in a range that would never be assigned by the Social Security Administration (SSA) <https://www.ssa.gov/kc/SSAFactSheet--IssuingSSNs.pdf>.