

Information Memorandum Transmittal Vocational Rehabilitation



Howard Fulk, Policy and Training Manager
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Number: VR-IM 20-02
Issue date: 05/18/2020

Topic: Other

Due date: 05/15/2020

Subject: Update VR-IM 19-11 SSN Expectation: Applicant Social Security Number (SSN) Validation. Rescind VR-IM 19-11 with additional information (rev. 1)

Applies to (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> All DHS employees | <input type="checkbox"/> County Mental Health Directors |
| <input type="checkbox"/> Area Agencies on Aging: {Select type} | <input type="checkbox"/> Health Services |
| <input type="checkbox"/> Aging and People with Disabilities | <input type="checkbox"/> Office of Developmental Disabilities Services (ODDS) |
| <input type="checkbox"/> Self Sufficiency Programs | <input type="checkbox"/> ODDS Children's Intensive In Home Services |
| <input type="checkbox"/> County DD program managers | <input type="checkbox"/> Stabilization and Crisis Unit (SACU) |
| <input type="checkbox"/> Support Service Brokerage Directors | <input checked="" type="checkbox"/> Other (<i>please specify</i>): All Vocational Rehabilitation staff |
| <input type="checkbox"/> ODDS Children's Residential Services | |
| <input type="checkbox"/> Child Welfare Programs | |

Message:

This Information Memorandum (IM) clarifies previous instructions issued in Information Memorandum 19-11 related to the verification of an individual's Social Security Number (SSN) as part of the VR application process.

It remains the Program's expectation that individuals applying for services with Vocational Rehabilitation should provide a valid Social Security Number (SSN) and any associated documents needed to verify this information.

State programs may not deny services to any individual that chooses to not provide their Social Security Number. VR may accept applications, determine eligibility and provide services to individuals that chose to not provide a social security number to VR. This is not considered best practice and every attempt should be made to obtain a participant's SSN if possible.

Note: Information Memorandum 19-11 is rescinded and is to be replaced by this guidance effective as of the date of issuance. Other than the specific guidance provided in this Action Request, no other Vocational Rehabilitation procedures have been amended by this transmittal.

Procedures:

When applying for services with vocational rehabilitation, applicants are expected to share their Social Security Number with the agency. As part of this process, individuals will be asked to provide documentation required to verify the accuracy of this information. This may include, but is not limited to:

- A Social Security Card
- Ticket to Work eligibility or participation
- Benefit documents (for example: a hard copy summary of benefits from Social Security, medical or other health benefits.
 - If using benefit documents, ensure that the copy lists the individual's SSN as not all copies do.
- Other documentation as appropriate to the purpose

It is important to ensure that an accurate Social Security number is assigned to a participant's casefile. If the applicant does not have a valid SSN, they may apply for a Social Security Number during the time of their service participation.

If the Social Security Number is unavailable:

If an applicant is unable to provide a verifiable SSN:

- An ORCA file cannot be initiated without a valid client identification number.
 - This is traditionally the individual's SSN
- Contact ORCAHelp and ask them to generate a Client Identification Number.
 - This number will be used to identify the individual in place of the SSN during the VR process.
 - VRCs should continue to try and obtain an SSN.
 - A client identification number cannot be used to verify employment obtained after the individual exits the VR program. The individual will need to provide their employer an SSN in order to be employed at this point anyway.

Do not generate a false Social Security Number for any program participant

User created identification numbers may be considered fraudulent and can result in significant complications for both the VR program and the individual in the future.

- If an SSN is absolutely not obtainable, the VRC must use the Client Identification Number created by ORCAHelp.

Discussion:

There are some situations when an individual may not provide a Social Security Number.

The individual is unable to provide their Social Security number:

- The number is not available, or held by someone else, on the day the individual meets with the counselor to apply.
- A Social Security Number has not been assigned.
 - In this circumstance, the counselor can ask for the individual to get the number and documentation to verify it for the next or future meeting.
 - VR may assist the individual to apply for a Social Security Number, if appropriate.

The individual refuses to provide their Social Security number:

- The expectation is that in this situation VRCs should provide counseling.
 - Share examples why the Social Security number is needed:
 - Useful for the individual.
 - Presumption of eligibility
 - Ticket to Work benefits
 - Employment Authorization Verification for the employer when ready to be employed

In most instances, the Social Security Number and verification can be obtained and documented in the participant file if presented to the individual as program expectation.

Participant Social Security Numbers are needed by the program:

VR uses the individual's SSN in several important ways:

- To gather data for performance indicators (income at time of employment, income at time of case closure, income 2nd and 4th quarter after case closure)
- Social Security reimbursement (so other people with disabilities can be served).
- Wage verification upon employment, exit from the program, at the 2nd and 4th quarter must be provided. If the participant is unwilling to provide, the Program will seek it from the employer.

- This is a program that is based on eligibility. Participants must provide the necessary information requested by the program to complete the assessment process (see application language). The program expects the Social Security Number to be shared.

References:

[Rehabilitation Services Administration \(RSA\) guidance](#) shows that an application cannot be denied because the individual refuses to share their Social Security Number. (Frequently-Asked Questions about the RSA-911. August 8, 2016, Question 10)

[Technical Assistance Circular, RSA-TAC-17-01](#) (August 17, 2017). Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs.

[Technical Assistance Circular, RSA-TAC-17-04](#) (June 1, 2017). Guidance on the Use of Supplemental Wage Information to Implement the Performance Accountability Requirements under the Workforce Innovation and Opportunity Act

If you have any questions about this information, contact:

Contact(s): Howard Fulk	
Phone:	Fax:
Email: howard.r.fulk@dhsosha.state.or.us	