

Rick Scott
GOVERNOR



Jesse Panuccio
EXECUTIVE DIRECTOR

MEMORANDUM

DATE: January 6, 2014

TO: Regional Workforce Board (RWB) Executive Directors

FROM: Lois A. Scott, Chief, Bureau of One-Stop and Program Support

SUBJECT: Handling Social Security Number Errors in Employ Florida Marketplace (EFM)

Social Security Numbers (SSN) are unique identifiers associated with a single person. Occasionally, we find that a particular SSN may have been compromised, intentionally or due to staff or customer data entry error. We also find duplicative registrations in EFM for the same person under different SSNs. When either of these types of errors is discovered, it is incumbent upon all of us to initiate appropriate steps to determine that the SSN is attached to the right individual and correct any erroneous data that may have been entered into any of the state's management information systems.

Attached are procedures to be followed when it is discovered that there is an error with the social security number or duplicative registrations attached to an individual in EFM.

Please forward this information to appropriate staff in your region for immediate use. Should you have questions or concerns, please contact Christa Nelson at Christa.Nelson@deo.myflorida.com.

LAS/cnn

cc: Tom Clendenning
Mike Lynch

Procedures for Correcting Social Security Number Errors

Should a customer try to register in Employ Florida Marketplace (EFM) and report that their social security number (SSN) is already in use by another individual or should staff identify a duplicative registration for a customer with a different social security number, staff should proceed as follows:

1. If necessary, staff should verify that there is an issue with the SSN in EFM.
2. Staff should request that the customer produce an original social security card or other original documentation issued by a state or governmental entity that documents the SSN and match it with appropriate picture identification. Staff must case note that he/she verified the source documentation.

While every effort must be made to review original documentation, staff may use third-party resources to verify the true owner of the SSN in the absence of such documentation. Third party resources may include SUNTAX, CONNECT and/or the Department of Children and Families' records.

3. Staff should also review reemployment assistance records to determine whether wage records exist or whether a claim has been filed and, if so, with what SSN. If staff find wage records exist or that an RA claim has been filed by a person with an incorrect SSN, staff must notify the Bureau of Reemployment Assistance by email at: onestop.mailbox@deo.myflorida.com.
4. If the customer requesting the use of the SSN provides appropriate documentation to demonstrate that the SSN is assigned to them, the customer may continue to register under that SSN. Otherwise, a pseudo SSN must be assigned to the customer.
5. Staff should review the EFM file for the customer to whom the SSN is assigned in error to determine whether recent activity or services have been documented in the file during the most recent four quarters.
 - a. If no activity has been documented for the customer in the most recent four quarters, a pseudo SSN should be assigned for the incorrect EFM registration and a case note entry done to document the SSN error and pseudo SSN creation.
 - b. If activities or services have been documented for the customer in the most recent five (5) quarters, staff must determine whether the customer using the incorrect SSN resides in a different region and contact the other region to explain the SSN error.
 - c. Staff in the appropriate region should attempt to contact the person to whom the SSN is assigned in error and case note the efforts in EFM.
 - i. Upon making contact with this customer, staff must request that they provide appropriate documentation of their correct SSN. If the customer is not able to provide the correct documentation, a pseudo SSN must be issued and the EFM file must be case-noted with the actions taken.

- ii. If the customer cannot be contacted, the incorrect SSN must be changed to a pseudo number and a case note entered documenting the action.
6. In the case of a duplicative registration, the account containing the correct SSN for an individual must be recognized as the correct account.
 - a. The account being merged must be assigned a pseudo SSN prior to the merge.
 - b. The information from the account with the incorrect SSN or duplicate case should be merged to the correct account. A request should be made to Regional Security Officer (RSO) to merge the accounts.
 - c. When the accounts are ready to be merged, the RSO should archive or delete the account with the incorrect SSN. See below for [procedures](#) to follow when merging accounts. Prior to merging the accounts, ensure that the gender and date of birth are the same in both accounts. If an issue is identified, contact Christa Nelson at: christa.nelson@deo.myflorida.com.
 - d. A case-note should be entered in the master account.

In all cases, the name of the staff member requesting the SSN change and/or assignment of a pseudo SSN should be documented in a case note for the affected case files. A second level review should be done by the Regional Security Officer (RSO) for all changes made to accounts due to SSN errors or duplicative registrations.

Procedures to Follow When Merging Accounts

1. Contact the RSO with the usernames, state IDs and last four digits of the SSN for the two accounts that need to be merged.
2. Explain why the accounts need to be merged.
3. The RSO should enter a record into the Online Project Communication (OPC) system requesting that the accounts be merged.
4. The language for the request must state: "Please merge username XXXX, state ID 11111 and username YYYYYY, state ID 222222 into master account username XXXX state ID 11111, where this is the account to remain."
5. Once the RSO verifies the account has been merged, the RSO should advise the requesting staff.
6. Staff should record new program services and activities in the new merged account.

Procedures to Follow When Assigning a Pseudo SSN

It is necessary to ensure that all efforts have been exhausted to identify an individual's social security number prior to assigning a pseudo SSN.

1. Enter "9" as the first digit.

2. Enter the last two digits of the jobseeker's birth year as the next two digits.
3. Enter zeros as the two middle digits. If this pseudo number has already been used, modify the middle digits and continue consecutively until you find an unassigned number (01, 02, 03...)
4. Enter the two-digit month and day of birth (mmdd).

EXAMPLE:

DATE OF BIRTH / ***PSEUDO SSN***

February 6, 1977 / ***977 00 0206***

NOTE: Only staff members have the permissions to assign and enter pseudo SSNs. The format for developing pseudo SSNs must not be provided to anyone other than One-Stop Career Center and Regional Workforce Board staff. All actions taken relative to compromised SSNs should be documented in EFM case notes for each affected customer.