

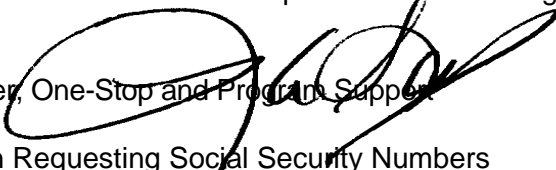


**Jeb Bush**  
Governor  
**Susan Pareigis**  
Director

**MEMORANDUM**

**DATE:** February 7, 2006

**TO:** Regional Workforce Board Executive Directors and Optional Workfare Program Administrative Entities \*

**FROM:** Lois A. Scott, Program Manager, One-Stop and Program Support 

**SUBJECT:** Privacy Act Implications When Requesting Social Security Numbers

Pursuant to a request from the Governor's Office, the Agency for Workforce Innovation's (AWI) Office of General Counsel (OGC) reviewed AWI forms for compliance with the Federal Privacy Act (Public Law 93-579) disclosure requirements. During this process, it came to the OGC's attention that in some circumstances, Regional Workforce Boards (RWB) may be using locally developed (non-AWI) forms which request the social security numbers (SSNs) of customers.

Given the unique relationship between the federal government, the AWI, and the RWB (e.g., RWBs performing government services and receiving federal funds from the AWI), along with federal and state law regarding SSN disclosure requirements, the OGC believes it would be prudent for the RWBs (and Optional Workfare (OW) Program Administrative Entities) to consult their legal representatives regarding the need to include an appropriate Privacy Act Statement on each locally produced form that asks a customer to provide a social security number.

The AWI will soon be issuing revised state-level developed forms that will include a Privacy Act statement for some of the programs operated in the One-Stop Career Centers.

Attachment 1 provides further rationale for the concern about the requesting of SSNs on locally generated forms. It also provides a summary of the applicable law and sample disclosure statements that the RWBs and OW Program Administrative Entities may consider.

Please direct questions to Fay Malone at [Fay.Malone@awi.state.fl.us](mailto:Fay.Malone@awi.state.fl.us).

Attachment 1

\* Carla Jones  
Angie Biddle  
Joan Mosier

LAS/osk

cc: Mike Switzer  
JenniLee Robbins  
Larry Miklus  
Gary J. Holland

**Agency for Workforce Innovation**

The Caldwell Building, Suite 100L • 107 East Madison Street • Tallahassee • Florida 32399-4122  
Phone 850-245-7105 • Fax 850-921-2253 • (TTY/TDD 1-800-955-8771 – Voice 1-800-955-8770)

For more information go to [www.myflorida.com](http://www.myflorida.com)