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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

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**FNS 235 Social Security Enumeration**  
**Change #1-2010**  
**March 1, 2010**

**235.01 SOCIAL SECURITY NUMBER (SSN) REQUIREMENT**

Each household member participating or applying for participation in the Food and Nutrition Services (FNS) Program is required to provide or apply for a social security number (SSN). The SSN is used to prevent duplicate participation; verify Social Security (SSA) and Supplemental Security Income (SSI) benefits; determine accuracy of information given by the Food and Nutrition Services unit (FNSU); perform matches with the Employment Security Commission (ESC), Social Security Administration (SSA), and the Internal Revenue Service (IRS) as required by the Income and Eligibility Verification System (IEVS); and facilitate mass changes in federal benefits. Once the individual provides a SSN, the individual has until the next recertification to provide verification of the SSN.

**235.02 PROCEDURES**

- A. Ask the applicant for each FNSU member's SSN. If a household member has more than one number, all numbers are required. If an individual does not know their SSN, cannot find their number, or has never had a number, follow the instructions in 235.03, Enumeration Procedures.
- B. The worker must explain to the applicant that failure to provide or apply for a SSN will result in disqualification of that person, unless good cause exists. If disqualified, the individual remains disqualified until he provides or applies for a number. (See 235.06, Determining Good Cause.) If an individual is disqualified for failing to show good cause, the county will notify the remaining individuals in the household of the disqualification and how the disqualification may be ended. (See Section 260 for instructions on budgeting the disqualified individual's income. All resources are counted.)
- C. For those individuals who provide a SSN prior to certification, recertification, or at a reported change, the county department verifies the SSN and documents the number has been verified. The county also makes a permanent annotation of the verification by entering a "V" in field 80-B of the DSS-8590.
- D. Do not include an individual in the FNS budget until proof of enumeration is provided for each individual who does not have a SSN except as provided in Section 320, Expedited Service.

**235.03 ENUMERATION PROCEDURES**

- A. An individual is enumerated on the date when one of the following occurs:
  - 1. The [DSS-8174, Referral for Social Security Number Application](#), is signed and dated by SSA. Date stamp the DSS-8174 when received from SSA. File the completed form in the case file.
  - 2. The receipt for application for a SSN is signed and dated by SSA. Date stamp the receipt when received in the agency. File the form in the case file.
  - 3. The household provides the Certificate of Live Birth, DHS-1201, or the mother's copy of the birth certificate on which block 17 is checked "yes." This means that the child has been enumerated at birth. Retain a copy of the DHS-1201 or the mother's copy of the birth certificate in the case record. See 235.04, Procedures for a Child Enumerated at Birth.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

- B. When adding an individual without a SSN to the FNS budget, enter a “P” in Field 80-B on the DSS-8590.
- C. Do not call or write the local Social Security Office to verify that an individual has applied for a SSN. This is not acceptable verification of enumeration.
- D. When completing documents to be sent to SSA, please note the following.
1. If the county department owns the documents proving identity and age, note on the DSS-8174 the documents are owned by the county. The local Social Security Office returns these documents to the county. If the individual owns the documents, note this on the DSS-8174 and the local Social Security Office returns these documents to the individual. If ownership is not documented on the DSS-8174, the local Social Security Office returns the documents to the applicant.
  2. Explain to the individual the types of documentation that must be provided to the local Social Security Office to complete the application for a SSN, such as a birth certificate, driver’s license, draft card, etc. If necessary, assist him in obtaining needed documentation. Refer to [Figure 235-1](#), SSA Required Documentation for Enumeration.
  3. Explain to the individual that if a parent applies for his child’s SSN at the local Social Security Office, the parent must provide proof of identity.
  4. If the county completes and sends the necessary forms to the local Social Security Office, the county should attach any certified documents proving identity and age to the forms sent.
    - a. If the individual owns the certified documents proving age and identity, have him sign the [DSS-8173, Release for Enumeration](#). This releases the county from any liability if the documents are lost. If the individual refuses to sign the DSS-8173, document on the form his refusal and continue with the enumeration procedures.
    - b. If the county owns the documents, do not have the applicant sign the DSS-8173.
- E. When the individual is referred to the local Social Security Office, or wants to mail the [SS-5, Application for a Social Security Number](#):
1. The local Social Security Office does not complete the line, “Date application completed” because at the point the DSS-8174 is signed and dated, the SS-5 has been completed.
  2. If the individual loses the DSS-8174 or forgets to take it to the local Social Security Office, the individual must request a receipt for application for a SSN. In this instance, the individual must provide the receipt to the county to verify the enumeration requirement has been met.
  3. It is the individual’s responsibility to provide the local Social Security Office with the documentation needed to complete the Enumeration Procedure and provide the county with verification that a SS-5 has been completed.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

**235.04 PROCEDURES FOR A CHILD ENUMERATED AT BIRTH**

When the FNSU states that a child was enumerated at birth, document in the case file that the Certificate of Live Birth, DHS1201, or the mother's copy of the birth certificate was provided as proof of enumeration. File a copy of the birth certificate in the case record. Advise the household to report the SSN of the newborn when received but no later than six months following the date of the child's birth or at the next scheduled recertification, whichever is later. Determine if good cause exists when the newborn's SSN is not received by the next recertification or within six months after the child's date of birth, whichever is later.

**235.05 VERIFICATION OF SOCIAL SECURITY NUMBERS (SSN'S)**

- A. Verify each SSN provided by the FNSU. Enter each verified SSN through the SLNC screen. Do not delay initial certification of an otherwise eligible household if verification of the SSN is not received. If verification of a reported SSN is not completed at the time of initial certification, it **must** be completed at the time of or prior to the household's next recertification.
- B. Verify the SSN by **one** of the following methods.
1. View the social security card or any official document containing the SSN. ("Official Document" is any document which contains a SSN provided by an organization or source which has verified the number for its purposes, such as a Social Security Award Letter.);
  2. Bendex, SDX, or SOLQ;
  3. SSN which appears on an Enumeration Data Sheet;
  4. SSN which has been verified by Work First Family Assistance (WFFA) or Medicaid Units;
  5. SSN which has been automatically added to the FSIS case record; **or**
  6. SSN coded "V" or "B" on the validation screen of the Master Client Index (MCI).

**NOTE:** A driver's license, pay stub, school ID, or metal card where the recipient provided the SSN is not an "Official Document." There is no proof that the SSN on such documents was verified.

**235.06 DETERMINING GOOD CAUSE**

- A. To determine if good cause exists for failure to comply with the enumeration requirement, consider information from the household, SSA, and any other source. Determine good cause for each FNSU member that failed to comply.
- B. Documentary evidence or collateral information that the household has applied for the number or made every effort to supply the necessary information to complete the application is considered good cause. Good cause does not include delays due to illness, lack of transportation, or temporary absence.
- C. If the household member applying for a SSN has been unable to obtain the documents required by SSA, such as a birth certificate, offer to assist the individual in obtaining these documents.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

- D. If the household member can show good cause why an application for a SSN has not been completed, allow that member to participate for one month in addition to the month of application. Determine good cause monthly for each member who failed to comply; otherwise, the member may not continue to participate.

**235.07 PROCEDURES FOR REFERRING AN INDIVIDUAL TO THE SOCIAL SECURITY OFFICE**

- A. Complete the [DSS-8174, Referral for Social Security Number Application](#), for each individual for whom a SSN is needed.
- B. Instruct the individual to carry the DSS-8174 and necessary documentation to the local Social Security Office. Refer to [Figure 235-1](#), SSA Required Documentation for Enumeration.
- C. Refer to 235.03, Enumeration Procedures.

**235.08 PROCEDURES WHEN AN INDIVIDUAL CANNOT GO TO THE LOCAL SOCIAL SECURITY OFFICE**

An individual who is not able to go the local Social Security Office to apply for a SSN may have a representative apply for him. If there is no representative for the individual, complete the [DSS-8174, Referral for Social Security Number Application](#) and a [SS-5, Application for a Social Security Number](#). Submit both forms to the local Social Security Office accompanied by the appropriate documentation. Refer to [Figure 235-1](#), SSA Required Documentation for Enumeration.

- A. Complete the SS-5 to the line that says, "Do Not Write Below This Line (For SSA Use Only)." Follow the instructions given on the SS-5 for completion of the form. Ensure that the individual signs the SS-5.
- B. Complete the DSS-8174 for each individual for whom a SSN is needed. Attach the DSS-8174 to the SS-5.
- C. Mail the DSS-8174, the SS-5, and the certified documents to the local Social Security Office. Retain a copy of the DSS-8174 in the case file.
- D. If the SS-5 is improperly completed, the local Social Security Office returns the DSS-8174, the SS-5, and the certified documents to the DSS office for correction. Within five workdays, return the corrected SS-5, DSS-8174, and the certified documents to the local Social Security Office.
- E. Refer to 235.03, Enumeration Procedures.

**235.09 PROCEDURES FOR AN INDIVIDUAL WHO WANTS TO MAIL THE SS-5 AND DOCUMENTS TO SSA**

If an individual wants to mail the application for a SSN to the local Social Security Office, complete the [DSS-8174, Referral for Social Security Number Application](#) and attach it to a blank [SS-5, Application for a Social Security Number](#). The individual completes the SS-5 and mails both forms along with documents proving identity and age, if applicable, to the local Social Security Office.

Consider using this method when the local Social Security Office is not easily accessible or transportation is a problem for the individual.

---

**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

- A. Complete the DSS-8174 for each individual for whom a SSN is needed.
- B. Attach the completed DSS-8174 to a blank SS-5. Explain what must be completed on the SS-5. Instruct the individual to sign the SS-5. Assist him in completing the SS-5, if necessary.
- C. Instruct the individual to mail the DSS-8174, the SS-5, and the documentation to the local Social Security Office.
- D. Refer to 235.03, Enumeration Procedures.

**235.10 COUNTY COMPLETES THE DSS-8174 AND THE SS-5 FOR ALL PROGRAMS**

Based on concurrence between the district Social Security manager and the director of the county DSS, a county may complete the [DSS-8174, Referral for Social Security Number Application](#) and the [SS-5, Application for a Social Security Number](#) for all applicants.

Follow procedures in 235.08 for completion of the necessary forms.

**235.11 VALIDATION OF SOCIAL SECURITY NUMBER**

When the SSN is added to the FNS record, it is also updated in the Master Client Index (MCI).

Twice a month (the first of the month and the middle of the month), the State sends a tape of SSN's found in the MCI for active individuals that do not have a validated code to SSA for validation. SSA compares the vital data to its NUMIDENT file, which is the file SSA uses to issue SSN's.

- A. The validation process with SSA does not require an exact match. A SSN may validate when you have verified vital data that is slightly different. For example, if the year of birth is correct, SSA considers this a match even if the month and day of birth are different.
- B. When the data submitted from FSIS meets the NUMIDENT validation criteria, the system enters a "V" on the MCI validation screen beside the SSN for that program. Occasionally, SSA assigns more than one SSN to an individual. When this occurs, more than one validated SSN is returned by SSA and posted to MCI. These are marked with a "D" on the MCI validation screen.

Since the NUMIDENT files are not always correct, an additional step takes place in the validation process. Any SSN that fails to validate when compared to SSA's NUMIDENT file is compared to BENDEX. If the name, DOB, and SSN match **exactly** the data found on BENDEX, the SSN is validated. A validation code "B" appears on the validation screen in MCI indicating that the SSN was validated by BENDEX.

- C. If no match is found on the NUMIDENT file, SSA will then check the ALPHADENT file.

If there is an exact match on the date of birth on the ALPHADENT file and the name is within tolerance limits as defined by SSA, SSA provides the State with the correct SSN. If an individual has more than one SSN previously issued, the SSA provides those as well.

If the SSA finds a match on the ALPHADENT file, the MCI system is not updated, but a case specific sheet is produced to indicate the SSN found by the SSA. The caseworker is only notified about good matches.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

- D. If the client is also in MCI as a participant in other programs, the name, DOB, and SSN are compared to those entries. If they match exactly, the SSN of the other program(s) is validated automatically. This process is completed on each individual in MCI who appears in an active case. Closed cases and pseudo SSN's are not validated.
- E. When a new individual is added to a case, it is automatically updated in MCI. MCI searches its files to determine if this person matches any individual in MCI already validated in another program. If so, the SSN is automatically validated, and a validation code and date are entered. If not, MCI selects this individual's SSN to send for validation.
- F. Revalidation of the SSN of an individual who has a validated number occurs when there is a change in:
1. The name,
  2. DOB,
  3. SSN,
  4. Race,
  5. County number,
  6. Aid program/category,
  7. Medicaid class,
  8. Case status (e.g., active to inactive),
  9. Individual ID,
  10. Sex,
  11. County case number,
  12. Case ID,
  13. Office number,
  14. District number, **or**
  15. SSI status and living arrangement.

When a name change is reported, request the individual to submit a new SS-5 to SSA. The individual's SSN cannot revalidate until SSA's records are changed.

**235.12 VALIDATION DISCREPANCY REPORT**

The Validation Discrepancy Report ([See Figure 235-3](#)) is generated when validation cannot be accomplished based on the match with NUMIDENT or BENDEX or, when program data differs in MCI, a SSN Validation Discrepancy Report is generated. The report is sorted by worker number and includes all identifying case information along with a discrepancy message. The report runs the fourth working day of each month.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

- A. The report is generated for the program specified in the "PROG" field. The report gives the district/worker number (DIST#), county case number (CTY CASE), and case ID number (SYS CASE). The following discrepancy messages may appear on the report:
1. DOB Does Not Match;
  2. Name Does Not Match;
  3. SSN Not in SSA File;
  4. Items Do Not Match;
  5. DOB Does Not Match BENDEX;
  6. SSA Name has changed;
  7. SSA DOB has changed; **or**
  8. Needs Valid SSN.
- B. If the report message consists of one line, only FNS individual data was used to attempt the validation when it was sent to SSA. Review the discrepancy message as indicated by an asterisk (\*).

Take the following actions to resolve the discrepancy.

1. Research the individual to ensure that FSIS contains the correct SSN, name, and DOB.
  2. Check for keying errors.
  3. If you are successful in resolving the discrepancies in the vital data, update the data field in question in SLNC. This causes the data to be sent to SSA again for validation.
  4. Allow at least 60 days for the validation process to work through the system. Do not send a manual validation request during that time.
- C. If the report consists of two lines, this indicates that another program's data was sent to SSA and was validated. The first line shows the other program's validated data. The program number, district worker number, and case number appear on the first line. The second line lists the FNS individual matched to the other program in MCI and a discrepancy message.

Review the discrepancy message that indicates what information is different from the validated information. The different data is indicated by an asterisk (\*). Follow the instructions in 235.12 B. to resolve the discrepancy.

1. Research the individual to ensure that FSIS contains the correct SSN, name, and DOB.
2. Check for keying errors in your program and the program that validated.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

3. If the discrepancy is in FNS and you are successful in resolving the discrepancies in the vital data, update the appropriate data field in SLNC. Refer to 235.14 if the data for the other program needs to be corrected. This causes the data to be sent to SSA again for validation.
4. Allow at least 60 days for the validation process to work through the system. Do not send a manual validation request during that time.

**235.13 MANUAL VALIDATION PROCESS**

The purpose of the validation process is to ensure that the correct person is associated with the correct SSN in order to accomplish the IEVS matches. If you determine through normal verification procedures that the vital data in FSIS is correct and the number cannot be validated through automated procedures, request a manual validation.

- A. Request manual validation from the Income and Eligibility Verification System (IEVS) Coordinator at the Division of Medical Assistance (DMA). Send the following information:
  1. A copy of the Discrepancy Report;
  2. Your name and telephone number;
  3. A copy of the SSA card showing the name and number as it appears in FSIS;
  4. A copy of the birth certificate showing the DOB as it appears in FSIS; **and**
  5. A copy of the most recent DSS-8590.
- B. If the IEVS Coordinator confirms with SSA that the SSN is correct, State staff enters validation code "M" on the MCI validation screen. The "M" code indicates that a manual validation has been completed for that SSN.
- C. If there is a discrepancy, the IEVS Coordinator confirms with SSA that there is a discrepancy with the SSN, notifies the county that there is a discrepancy, and the county requests that the participant contact SSA to make corrections.
- D. The manual validation process takes some time to complete, and the individual may appear on the SSN Discrepancy Reminder Report. It is not necessary to send the information to the Economic Independence Automation Unit again while the validation process is taking place.

**235.14 RESOLVING DISCREPANCIES WHEN INCORRECT DATA VALIDATES**

Since SSA does not require an exact match for validation, cases with the wrong vital data may validate, and the program with the correct individual data shows a discrepancy. The program with the incorrect data must correct its base system, regardless of whose data validated.

**EXAMPLE:** A client born April 15, 1927, receives both FNS and Medicaid benefits. EIS shows the birth date as March 15, 1927, and FSIS shows the birth date as April 15, 1927. The Medicaid data was sent to SSA for validation and returned validated. SSA considered the data a match since the year of birth was correct.

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**FOOD AND NUTRITION SERVICES CERTIFICATION**  
**ELIGIBILITY REQUIREMENTS**  
**Social Security Enumeration**

---

The discrepancy report generated to FNS indicates a discrepancy in the DOB. Upon verification that the client's correct DOB is April 15, 1927, Medicaid must correct the data using the Name Change (NC) screen.

Once the change is made in the birth date in EIS, the SSN is automatically resubmitted for validation. At that time, the SSN validates again and MCI automatically validates the other matched program since dates are now identical.

**235.15 SSN VALIDATION REMINDER REPORT**

The SSN Validation Reminder Report ([See Figure 235-4](#)) lists individuals from earlier discrepancy reports on which no action has been taken. The report is printed in the same format as the discrepancy report. It is generated when no action has been taken within 60 days of the original discrepancy report or when an individual has been in FSIS more than 125 days without a SSN. The report runs the fourth workday of each month.

- A. If you have taken action (such as requesting manual validation) but it has not yet been completed, such individuals are listed on the reminder report. Take no additional action at this time.
- B. The "Needs SSN" message appears on the reminder report to indicate that the individual has been in FSIS with a temporary number for more than 125 days. Individuals with a temporary number have zeros in the SSN field in MCI. Obtain a SSN and update FSIS.