

**DATE:** July 23, 2024

**OPERATIONS MEMORANDUM #24-07-05**

**SUBJECT:** Changes to the Enumeration Verification Process

**TO:** Executive Directors

**FROM:** Robert Hixson  
Director  
Bureau of Operations

**PURPOSE**

To inform County Assistance Offices (CAOs) of the additional Enumeration Verification options for lawfully admitted non-citizens and procedures for incorporating them into the eligibility determination process.

**BACKGROUND**

Each non-citizen applying for or receiving benefits must provide or apply for a Social Security Number (SSN) as a condition of eligibility for Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Emergency Shelter Assistance, State Blind Pensions (SBP), State Supplementary Payment-Only (SSP-Only), Medical Assistance (MA), Long-Term Care (LTC) and Home and Community-Based Services, or the Children's Health Insurance Program (CHIP), with some exceptions provided in [SHB 950.1](#) and [SHB 950.2](#). When individuals cannot provide an SSN, the CAO uses the Referral to the Social Security Administration (PA 1564), to refer them to the Social Security Administration (SSA) to apply for and verify an SSN. Once the non-citizen has verified that they have applied for an SSN, assistance may be authorized pending the issuance of an SSN. Failure to return a completed PA 1564 or an SSN, may result in non-citizens being denied or losing access to these vital programs.

Many non-citizens are assisted by other agencies, such as United States Citizenship and Immigration Services (USCIS) or a Local Resettlement Agency, with the SSN application process as they enter the country. This Operations Memorandum (Ops Memo) provides the caseworker with additional methods to verify the non-citizen has already applied for an SSN and to authorize benefits pending the issuance of that SSN.

SSA issues one of three types of Social Security cards. All cards show the name and SSN. United States Citizens and Lawful Permanent Residents are issued an unrestricted SSN. Other non-citizens may have one of the following two types of restricted cards:

- Valid For Work Only with the Department of Homeland Security Authorization
- Not Valid for Employment

Verification of application for an SSN is not limited to the individual returning a completed PA 1564 if another agency has assisted with the application process.

## **DISCUSSION**

The reasons an individual cannot provide an SSN may be that they never applied for an SSN, they did apply for an SSN and are waiting for SSA to assign a number, or they do have an SSN number but do not remember it and do not have documentation of the number.

Non-citizens who have never applied for an SSN will be assisted by the CAO in applying for an SSN. The CAO will complete the PA 1564 with the individual and assist them with completing the SS-5 Application for a Social Security Card. The [SS-5 fillable](#) form can be found on-line, printed, and provided to the non-citizen.

Non-citizens that did apply for an SSN with the help of another agency and are waiting for SSA to assign a number may use alternate methods that demonstrate they have cooperated in applying for an SSN.

Non-citizens that applied with the help of another agency and were assigned a number but do not remember it and are unable to document it, may also use alternate methods that demonstrate they have cooperated in applying for an SSN.

**Example:** When USCIS authorizes employment, that process includes applying for an SSN and results in USCIS issuing the I-766 Employment Authorization Document (EAD) card.

Non-citizens that are not Authorized for Work require an SSN to be eligible for ongoing TANF and SNAP. Non-citizens that are not Authorized for Work are not required to provide or apply for an SSN for MA, LTC, and CHIP as a condition of eligibility; however, the CAO will still assist them in applying for one.

**If** the CAO encounters individuals with a letter from SSA stating the individual is ineligible for an SSN due to not being work authorized or the Systematic Alien Verification for Entitlements (SAVE) verification indicates they are not authorized to work,

**Then** the CAO must assist the individual in applying for the restricted non-work authorization SSN. The CAO will provide the individual with the new PA 1564 (See [OPS 24-07-04](#)) to request the restricted non-work authorization SSN and refer them back to SSA.

### **Refugees**

Refugees are not required to provide or apply for an SSN as a condition of eligibility for Refugee Cash Assistance (RCA) and Refugee Medical Assistance (RMA). Refugees are required, with some exceptions, to provide an SSN to be eligible for ongoing TANF, SNAP, SBP, SSP-Only, MA, LTC, or CHIP.

The CAO can consider refugees arriving after December 12, 2023, as having work authorization and meeting the requirement to apply for an SSN if no SSN number is provided during the public assistance application process. USCIS now provides streamlined Employment Authorization for refugees arriving after December 12, 2023. USCIS initiates an electronic application for an SSN for all Employment Authorizations. **This does not apply to individuals admitted under the Refugee/Asylee Relative Petition (Form I-730).**

Public or private Refugee Resettlement Agencies (RA) help refugees apply for an SSN. Not all refugees are working with an RA, and the CAO must help refugees to apply for an SSN when necessary.

Refugees must be ineligible for TANF, MA, LTC or CHIP prior to authorizing RCA and RMA but will not be denied RCA or RMA for failure to provide or apply for an SSN. If an RCA or RMA recipient becomes eligible for TANF, MA, LTC or CHIP while receiving RCA or RMA, the CAO must close the RCA or RMA and authorize the TANF or MA.

### **Other Lawfully Admitted Non-citizens**

Lawfully admitted non-citizens must provide an SSN to receive ongoing TANF, SNAP, SBP, SSP-Only, MA, LTC, and CHIP with a few exceptions. The non-citizen that is unable to provide an SSN must verify application for an SSN before TANF, SBP, SSP-Only, SNAP, MA, LTC, and CHIP benefits can be authorized, with some exceptions. The non-citizen who is unable to provide an SSN after 120 days of eligibility must have their eligibility reviewed. The review should determine if the individual continues to meet an exception for MA, LTC, or CHIP. These individuals will appear on the monthly Zero SSN Report.

### **Enumeration Verification Policy at Application**

The CAO will consider the verification requirement of application for an SSN met with any of the following documents:

- PA 1564 completed and signed by SSA.

- SSA-5028 - Receipt for Application for an SSN.
- SSA-5029 - Receipt for Application for a Non-Work SSN.
- USCIS I-485 - Application to Register Permanent Residence with items 16 and 17 completed. The application is the precursor to issuing the I-551.
- USCIS I-551 - Lawful Permanent Resident card.
- USCIS I-765 - Application for Employment Authorization with items 14 and 15 completed. The application is the precursor to issuing the I-766.
- USCIS I-766 - EAD card.
- SAVE return showing non-citizen has EAD.
- Collateral contact with a refugee's public or private sponsor in person, through the mail, or by telephone who can be expected to give reliable information and attests they assisted with the application for an SSN. The CAO must make a collateral contact when the CAO decides that they must make a quick decision to avoid unnecessary hardship for the individual. See [CAH 178.4](#), [SNAP 578.5](#) and [MAEH 378.4](#). Narrate the collateral contact information in the case record.

**NOTE:** The USCIS reported that Afghan Special Immigrants and Afghan Humanitarian Parolees are processed for an SSN during entry and may not have documentation of an SSN. If these applicants state they have applied for an SSN, self-attestation is acceptable for TANF, SBP, SSP-Only, SNAP, MA, LTC, and CHIP for initial authorization, and ongoing eligibility will be reviewed if they appear on the monthly Zero SSN report.

### **Enumeration Verification Policy at Zero SSN Report review**

Individuals who have not provided an SSN will appear on the Zero SSN report after 120 days.

The CAO must review the case record to determine if an SSN has been provided. Review the case for any exceptions to providing an SSN per SHB 950.2 or Good Cause per SHB 950.23. Take action to discontinue TANF, SBP, SSP-Only, SNAP, MA, CHIP, and LTC for individuals if no SSN has been provided and they do not meet an exception or good cause. Review for RCA and RMA if the individual is a refugee and has been in the country less than 12 months.

### **Enumeration Verification Policy at Semi-Annual Reporting or Renewal**

The CAO must review the case record to determine if an SSN has been provided. Review the case for any exceptions to providing an SSN per SHB 950.2 or Good Cause per SHB 950.23. Take action to discontinue TANF, SBP, SSP-Only, SNAP, MA, LTC, and CHIP for individuals if no SSN has been provided and they do not meet an exception or good cause. Review for RCA and RMA if the individual is a refugee and has been in the country less than 12 months.

## **PROCEDURES**

If a person remembers their SSN number but does not have documentation, the CAO will enter the number provided and use an SSN verification code 02 - Unverified/Pending Verification and the system will validate it with SSA.

If the person does not remember their number or has not applied for an SSN, the CAO will first verify the individual has applied for an SSN. When authorizing assistance, the CAO will enter zeros in the SSN field and use an SSN verification code 04 - No number/Referred to SSA. The system will collect the number from SSA if available and if one is not available the individual will appear on the monthly Zero SSN report for review.

CAOs are required to narrate the SSN application verification used to meet the requirement to authorize benefits.

**NOTE:** SSA is committed to providing an SSN within two weeks for lawfully admitted non-citizens with work authorization. See SSA Program Operations Manual System [RM-10205.700](#). The process for SSA to issue a non-work authorized SSN requires the individual to submit necessary documents, complete an in-person interview and verify that an SSN is needed as a condition of eligibility for public assistance.

### **Access to RCA and RMA:**

Refugees must be ineligible for TANF or MA prior to authorizing RCA and RMA but will not be denied RCA or RMA for failure to provide or apply for an SSN.

When the “unable to verify” selection attempts to enumerate, CAOs should make a referral to SSA but not delay or deny authorization of RCA or RMA pending verification of enumeration. A delay is when authorization occurs beyond the department’s normal processing period of 30 days for Cash or SNAP or up to 45 days for MA.

**Example:** A single adult refugee applies for cash, SNAP and MA and qualifies for expedited SNAP. The CAO will authorize expedited SNAP and RCA. The individual is not eligible for ongoing SNAP and MA at the end of the 30-day application period if the individual has not verified application for an SSN and does not meet an exception or good cause. The CAO must not deny RMA for failure to enumerate.

**Access to other benefits:****MA**

Verification of application for an SSN needs to be established before MA is authorized unless the individual meets an exception to providing or applying for an SSN prior to being authorized. See SHB 950.2. An SSN **must be provided** for ongoing MA benefits to continue beyond 120 days if an exception is not met.

**SNAP**

Verification of application for an SSN is not required when authorizing expedited SNAP. Verification of application for an SSN needs to be established before ongoing SNAP benefits are authorized for any individual who does not have an SSN unless good cause is established. See SHB 950.23. An SSN **must be provided** for ongoing SNAP benefits to continue beyond 120 days unless good cause remains. Good cause must then be determined monthly for the individual to continue to participate.

**TANF/SBP/SSP-Only**

Verification of application for an SSN needs to be established before TANF, SBP or SSP-Only benefits are authorized for any individual who does not have an SSN. An SSN **must be provided** for ongoing TANF benefits to continue beyond 120 days.

**CHIP**

Verification of application for an SSN needs to be established before CHIP is authorized unless the individual meets one of the following exceptions to providing or applying for an SSN:

- The CHIP applicant is not eligible to receive an SSN.
- The CHIP applicant does not have an SSN and may only be issued an SSN for a valid non-work reason.
- The CHIP applicant is a member of a recognized religious sect, adheres to the tenets or teachings of the sect, and refuses to obtain an SSN because of well-established religious objections.

An SSN **must be provided** for ongoing CHIP benefits to continue beyond 120 days if an exception is not met.

**LTC**

Verification of application for an SSN needs to be established before LTC is authorized unless the individual meets an exception to providing or applying for an SSN prior to being authorized. See SHB 950.2. An SSN **must be provided** for ongoing LTC benefits to continue beyond 120 days if an exception is not met.

**NEXT STEPS**

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Ops Memo to your Area Manager.
3. This Ops Memo is in effect until changes are incorporated in SHB 950.