DATE: **July 16, 2024**

OPERATIONS MEMORANDUM #24-07-04

SUBJECT: Changes to Referral to the Social Security Administration (SSA) Form (PA 1564)

TO: Executive Directors

FROM: Robert Hixson
Director
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PURPOSE

To inform County Assistance Offices (CAOs) of the update to the PA 1564 when referring citizens and non-citizens to SSA for a Social Security Number (SSN) as a condition of eligibility for Temporary Assistance to 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 (HCBS), or the Children's Health Insurance Program (CHIP), with some exceptions for the mentioned programs provided in SHB 950.2.

BACKGROUND

When individuals cannot provide an SSN or verify they applied for an SSN, the CAO will use the PA 1564 to refer them to the SSA to apply for an SSN. The Office of Income Maintenance (OIM) was informed in 2022 that the PA 1564 did not meet SSA requirements to request a restricted "Not Valid for Employment" SSN for non-citizens because the form did not list the federal and state laws requiring the SSN for the assistance programs.

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

- Valid For Work Only with the Department of Homeland Security Authorization

- Not Valid for Employment

SSA will determine the work authorization status of the non-citizen. Non-citizens lawfully admitted to the U.S. without work authorization from Homeland Security must have a valid non-work reason for needing an SSN. Federal or state laws requiring an SSN to receive assistance as a condition of eligibility is a valid non-work reason. SSA will issue a restricted SSN not valid for employment to non-citizens lawfully admitted to the U.S. without work authorization if the individual demonstrates the SSN is needed to be eligible for assistance.

Requests for restricted non-work SSNs must also include citations to the federal and state requirements and an original ink signature from the agency representative making the request in accordance with SSA Program Operations Manual System RM-10211.600.

OIM developed an interim process to meet the SSA requirement while OIM updated the PA 1564. The form has been updated to meet SSA's requirements and updates to documents of evidence have been made to reflect SSA's current acceptable items. The interim process is no longer applicable and Operations Memorandum (Ops Memo) 23-04-01 is obsolete.

DISCUSSION

A new selection "To Apply for A Restricted Social Security Number" has been added and lists the state and federal regulatory requirements to cooperate in obtaining an SSN as a condition of eligibility for TANF, SNAP, SBP, SSP-Only, MA, LTC and CHIP. Please review program exceptions found in SHB 950.2. The updated PA 1564 incorporates the request for an SSN used for most public benefits. The cover letter is no longer required when using the new PA 1564.

NOTE: Non-citizens applying for Emergency Medical Assistance are not required to provide information about or verify citizenship status or an SSN. Individuals who are not applying for benefits for themselves are not required to provide information about or verify their citizenship or an SSN.

NOTE: Refugees are not required to apply for an SSN as a condition of eligibility for Refugee Cash Assistance (RCA) or Refugee Medical Assistance (RMA).

PROCEDURES

The PA 1564 (Attachment 1) will be completed by the Income Maintenance Caseworker (IMCW) and be provided to an applicant/recipient. See SHB 950.4 Referral to SSA. The new form now includes the selection "To Apply for a Restricted Social Security Number" to be used for a non-citizen applicant who is not a Lawful Permanent Resident, has not applied for an SSN, and requires an SSN to become eligible for or remain eligible for public assistance programs.

The CAO will complete the PA 1564 in duplicate when referring an individual to SSA. The CAO will give the individual the original with the ink signature and scan a copy into the case record until the individual returns the original copy completed and

signed by SSA. The copy completed by SSA must be kept in the case record until the SSN is posted to the Electronic Client Information System (eCIS).

The CAO will review the evidence documentation information on the reverse side of the form with the individual and discuss the types of evidence of age, identity, and U.S. citizenship, or non-citizen status the individual must present to SSA. The CAO will assist the individual, if necessary, in obtaining the documents.

The CAO will enter information on the **PA 1564** as follows:

- Return Date – The date the individual is requested to return the form to the CAO.

- Welfare Identification Number (NPN) – Enter the NPN as follows:

  1. The first two digits of the State BENDEX Code (39) are pre-entered. Leave the shaded space blank.

  2. Enter the two-digit county code.

  3. Enter the two digit or alpha district code. If the CAO has no districts, enter two zeros.

  4. Enter the seven-digit record number. Proceed with zeros if the record number contains fewer than seven digits.

  5. Enter the two-digit line number assigned to the individual.

  NOTE: Write zeros with a slash (Ø) to distinguish them from the letter O.

  Example: 39 Ø2Ø11234567Ø1

- Individual Name – The full name of the individual who must apply for an SSN or verify an SSN.

- Individual's SSN, if applicable – The SSN associated with the individual, if the individual has a number. If the individual has more than one number, enter all numbers. Leave blank if the individual does not have an SSN.

- To Apply for a Social Security Number – Check this block if the client does not have an SSN and is a U.S. citizen or Lawful Permanent Resident.

- To Apply for a Restricted Social Security Number – Check this block if the client does not have an SSN and is a lawfully present non-citizen. Then mark the assistance program the individual is eligible to receive with proper enumeration. For SBP and LTC, mark the MA program block. Additionally, you will need to provide the Systematic Alien Verification for Entitlements

number or the Passport number.

- <u>To Verify a Previously Assigned Social Security Number</u> – Check this block if one of the following situations applies:

    1. Individual says he was issued an SSN but cannot remember the number.

    2. Individual has more than one number.

       NOTE: Enter all numbers provided by the individual in the block designated "SSN".

    3. Individual reports a name change from the name on the SSN card. Check this block if the correct name is on eCIS and the name on the SSN card is different.

    4. The SSN cannot be posted to eCIS or validated by SSA because of a mismatch. Check the appropriate mismatch block and provide SSA with the correct information.

       NOTE: These mismatches appear as Workload Dashboard Alert SSN 020 – SSN Unverified by SSA Demographic Review Required.

- <u>County Assistance Office</u> – Name and address of the CAO.

- <u>County Assistance Office Signature and Date</u> – The signature, in ink, of a CAO representative (caseworker, supervisor or manager) and the date the referral form is completed by the CAO.

- <u>Telephone Number</u> – The CAO caseworker's phone number.

- <u>To Be Completed by the Social Security Administration</u> – This section will be completed by SSA. If the application cannot be processed, SSA will provide the individual with an explanation.

    NOTE: Tell the individual to make certain that SSA completes and signs this section to verify their SSN or that they applied for an SSN.

A CAO representative (caseworker, supervisor, or manager) must enter a date, a phone number, and an original ink signature. The signature cannot be electronic or a photocopy. SSA must receive the PA 1564 with the original ink signature of an agency representative.

The CAO must use the attached PA 1564 (04/24) version which is available in Docushare Online Forms until the eCIS system update is implemented adding the updated PA 1564 to the Standalone Form Generation screen.

A case narrative must be entered stating the original PA 1564 was provided to the applicant/recipient. A second narrative must be entered about the outcome of the referral to SSA for an SSN.

SSA will determine the non-citizen's work authorization status when issuing the SSN. SSA requires an in-person interview at the SSA for non-citizens without work authorization prior to SSA completing the PA 1564. This in-person interview requirement may cause a delay in the non-citizen returning the completed PA 1564 by the CAO due date to verify their application for an SSN.

- If the individual reports back that SSA will not provide verification of application until the interview is complete, then the delay in verification is caused by SSA and the CAO will authorize assistance pending verification and set an alert to review every 30 days until verification is provided. Remember that the eligibility determination and authorization of assistance will not be later than 30 calendar days from the application date. The IMCW will use SSN verification code 04 – No Number/Referred to SSA when authorizing benefits. (See CAH 178.6, MAEH 378.3, and SNAP 578.3).

Some individuals may have applied for an SSN, either before coming to the CAO or after a CAO referral and received an SSA letter denying them an SSN because they are not allowed to work in the U.S. and do not have a valid reason to get a non-work SSN. The CAO will consider the verification of application for an SSN as complete for benefit authorization and refer the individual back to SSA with the PA 1564 for a restricted non-work SSN. In these situations, the CAO will do the following:

TANF, SBP, SSP-Only, benefits may be authorized.

- Complete a new PA 1564 and provide to individual to take to SSA for issuance of a non-work SSN. Use SSN verification code 04 – No Number/Referred to SSA when authorizing benefits.

SNAP, benefits may be authorized.

- Complete a new PA 1564 and provide to individual to take to SSA for issuance of a non-work SSN. Use SSN verification code 04 – No Number/Referred to SSA when authorizing benefits.

MA, CHIP, AND LTC/HCBS, benefits may be authorized.

- Complete a new PA 1564 and provide to individual to take to SSA for issuance of a non-work SSN. Use SSN verification code 04 – No Number/Referred to SSA when authorizing benefits. MA, CHIP and LTC only recipients that are non-citizens and not eligible for an SSN are not required to have an SSN to be eligible.

If the individual fails to verify application for an SSN without good cause the CAO will review benefit eligibility in the following manner:

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.

- o If that individual is a **refugee**, review for RCA and authorize RCA if eligibility criteria is met. See SHB 730.

- o If the **refugee** later verifies an SSN and meets TANF eligibility, close RCA and open TANF effective the first day following RCA closure.

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.

MA, LTC/HCBS

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.

- o If the individual is a refugee, review for RMA and authorize RMA if eligibility criteria is met. See SHB 730.

CHIP

Verification of application for an SSN needs to be established before CHIP is authorized. The exceptions in SHB 950.1 and 950.2 designated for MA also apply to CHIP.

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.

ATTACHMENT

Attachment 1: PA 1564 - Referral to the Social Security Administration