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JOINT WIOA BULLETIN NO. 003-20, Change 1

TO: WIOA Partners and WDD Staff

FROM: Maricar Pilotin-Freitas, Administrator
Workforce Development Division 

SUBJECT: Social Security Numbers in HireNet Hawaii

PURPOSE

The purpose of this bulletin is to amend Joint WIOA Bulletin No. 003-20, with additional guidance regarding the collection, usage, storage, and protection of individual's Social Security Numbers (SSNs) in HireNet Hawaii (HNH) following issuance of TEGL No. 10-23 from U.S. Department of Labor, Employment and Training Administration (Reducing Administrative Barriers to Improve Customer Experience in Grant Programs Administered by the Employment and Training Administration).

BACKGROUND

Federally funded programs including WIOA Title I (Adult, Dislocated Worker, Youth) and Title III (Wagner-Peyser), Trade Adjustment Assistance (TAA), and SCSEP (this is not an exhaustive list), may need to collect participants' SSNs while maintaining the participants' privacy. The SSN is necessary to accurately measure the performance of various federally funded programs and satisfy federal reporting requirements. Many times job seekers' records in HNH contain a pseudo number since participants are not required to provide a SSN. A policy was issued in 2020 to outline the policy and procedures to prevent duplication of job seeker records in HNH and to better match the HNH records to the wage records to comply with the

federal reporting requirements. Updated guidance is given to formalize the notification of individuals about the use of their SSN in writing, encourage their disclosure, but allow them to obtain services if they decline to provide their SSN. It also provides guidance on using Supplemental Wage Data Collection to obtain performance measures when SSN is not available.

POLICY

The SSN field has been turned on as a data field requirement to job seekers to register in HNH. The SSN is used to match quarterly wage records to measure performance against goals set for federal, State and local performance measures. The American Job Center (AJC) staff and WIOA partners shall utilize the steps provided below in complying with this bulletin.

1. For Unemployment Insurance (UI) Claimants and participants under the TAA as described in TEGGL No. 5-08, AJC staff shall collect SSNs for these two (2) target populations.
2. For job seekers who do not meet the criteria of Item 1 above and refuse to provide their SSN as part of their registration in HNH, job seekers must be provided a written explanation that although their eligibility for programs cannot be refused if they decline to disclose their SSN, as federal grantees WIOA Partners, AJC and WDD staff are required to request the SSN as part of their efforts to meet the federal reporting requirements to evaluate Hawaii's performance in delivering services and activities. The written explanation should include a Privacy Notice (see Attachment 4). This notice may be adapted by WIOA partners.
3. After WIOA partners, AJC and WDD staff have completed Item 2 above and job seekers continue to refuse to provide their SSN, AJC staff will assist the job seeker with their HNH registration by entering a pseudo number (see Attachments 1-3).
4. Staff should follow supplemental wage data collection guidance from WIOA Bulletin No. 32-19 (Use of Supplemental Wage Information) and Job Service Bulletin No. 01-23 (Collection of Supplemental Wage Information for Participants of Jobs for Veterans State Grants (JVSG) and Wagner-Peyser Programs) and any subsequent updates to those bulletins for procedures to collect wage data.

For job seekers who currently have an existing HNH record without a SSN, AJC staff shall enter the SSN using the existing record and/or registration.

PROCEDURES

1. Assigning a Pseudo SSN Per the Job Seeker's Request

If a job seeker refuses to provide their SSN and the job seeker is not a UI Claimant or a participant under the TAA, AJC staff shall follow the instructions provided in Attachment 1 which outlines the process for assigning a pseudo SSN to an unregistered job seeker in HNH.

2. Updating an Existing Record in HireNet Hawaii With Pseudo Number to SSN

When updating an existing job seeker record in HNH that contains a pseudo number, AJC staff shall obtain the job seeker's SSN as reference and verification for updating the HNH account. WDD staff are responsible for updating the pseudo number to valid job seeker SSN as provided in Attachment 2 and Attachment 3 which outlines the process for updating an existing HNH record that contains a pseudo number.

EFFECTIVE DATE

This bulletin is effective immediately.

INQUIRIES

Inquiries regarding this bulletin may be directed to Mr. Jayson Muraki at (808) 586-8878 or Jayson.K.Muraki@hawaii.gov or Ms. Lisa Simmons at (808) 586-8812 or Lisa.E.Simmons@hawaii.gov.

ATTACHMENTS

Attachment 1: Assigning a Pseudo SSN at the Job Seeker's Request

Attachment 2: Updating an Existing Record in HireNet Hawaii From Pseudo Number to SSN

Attachment 3: Local Workforce Areas Pseudo Numbers

Attachment 4: Privacy Notice

Assigning a Pseudo SSN at the Job Seeker's Request

1. Check for an existing HireNet Hawaii (HNN) account.
2. Go to Manage Individuals.
3. Assist an Individual.
4. Search for the job seeker using any of the search parameters listed on the screen (e.g., Search by First Name Last Name, SSN, Last Name/Date of Birth, etc.).
5. If there is no existing HNN record, begin registering the job seeker with the comprehensive registration.
6. Assign a pseudo SSN according to Local Workforce Area pseudo parameters.
7. Complete the job seeker's registration.
8. Update the job seeker's case notes stating the reason for assigning a pseudo SSN.

Updating an Existing Record in HireNet Hawaii From Pseudo Number to SSN

1. Go to Manage Individuals.
2. Assist an Individual.
3. Search for the job seeker using any of the search parameters listed on the screen (e.g., First Name Last Name, Last Name/Date of Birth, etc.).
4. Verify that you are working with the correct job seeker.
5. Click the job seeker's 'Username'.
6. Click 'My Individual Profile'.
7. Click 'Personal Profile'.
8. Under 'Staff Information', click on 'View/Edit SSN'.
9. WDD assigned staff, WDD supervisor or WDD manager to update the job seeker's SSN.
10. Update the job seeker's case notes stating the reason for updating the job seeker's SSN.

Local Workforce Areas Pseudo Numbers

- 9XX (based on LWA DOL assigned identifier)
- DD (job seeker birth date)
- MMY (job seeker's birth month and last two digits of job seeker's birth year)

LWA Name	Code	Example Pseudo SSN
Hawaii	910	910-12-0370
Kauai	920	920-12-0370
Maui	915	915-12-0370
Oahu	905	905-12-0370

LWA assigned 900 series identifier is based on the following codes.

Hawaii	15010
Kauai	15020
Maui	15015
Oahu	15005

Privacy Notice

The State of Hawaii is aware that a key element of success to utilizing data across agencies for either improved customer service or improved measurement and tracking of outcomes is ensuring the integrity of all data and ensuring confidential data is treated as such. This is accomplished with various technical safeguards and ensuring personnel handling this data are properly trained in all relevant regulations and the fundamentals of handling personal and confidential data.

Technical safeguards may include:

- Approved processes that limit access to the data to only those personnel who require access to carry out their daily job functions.
- Network security, monitoring, firewalls, etc. to prevent unauthorized access to data from entities outside of State government.
- Encryption technology.
- Secure data transport mechanisms.

All State personnel undergoes annual training on the proper handling of confidential data. This training is updated to reflect the most current statutes and interpretations. Those specifically involved in reporting are trained on the various de-identification and aggregation rules that apply.

All core partners that will provide and/or share data to execute federal program requirements will do so under a signed MOU to ensure the security of sensitive information. All core partners will agree to follow all applicable federal, State, and local laws pertaining to confidential information. Each partner will ensure that the collection and use of any information that contains personally identifiable information will be limited to purposes that support the programs and activities described by the relevant MOUs.

Pursuant to Chapter 92F-14, Hawaii Revised Statutes, the State protects records in which the individual has a significant privacy interest, including medical, psychiatric, or psychological history, diagnosis, condition, treatment or evaluation and information relating to eligibility for social services or welfare benefits or to the determination of benefits levels.