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 | ADMINISTRATIVE DIRECTIVE |
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TRANSMITTAL: 90 ADM-23

TO: Commissioners of
 Social Services

DIVISION: Income
 Maintenance

DATE: July 31, 1990

SUBJECT: Food Stamps: Changes in Social Security Number Policy

SUGGESTED DISTRIBUTION: Food Stamp Staff
 Public Assistance Staff
 Staff Development Coordinators

CONTACT PERSON: County Food Stamp Representative at 1-800-342-3715,
 extension 4-9225.

ATTACHMENTS: None

FILING REFERENCES

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
87 ADM-25		387.8(c)	7 CFR 273.2	FSSB	
		387.9(a)(5)	(d)	Sections:	
		387.9(a)(7)	7 CFR 273.2	IV-G	
		(i)(b)	(f)(1)(v)	V-B-7.2	
		387.16(c)(2)	7 CFR 273.6	V-B-8.2	
		387.16(c)(3)		V-B-8.3	
		(ii)		X-H-1	

I. PURPOSE

This is to inform local districts of two changes in the Social Security Number (SSN) policy for the Food Stamp (FS) program:

- A. Disqualification penalties for households who refuse to cooperate in resolving a SSN validation discrepancy, and
- B. Procedures for applicants who refuse to apply for a SSN because of a valid religious belief.

II. BACKGROUND

Previous food stamp policy in 87 ADM-25 and Food Stamp Source Book (FSSB) Section V-B-8.3 states that an individual who refuses to cooperate in resolving an SSN validation discrepancy must be disqualified from the Food Stamp Program.

Previous food stamp policy stated in FSSB V-B-7.2 requires all household members to provide or apply for an SSN in order to be eligible to participate in the Food Stamp Program. No provisions have existed for exempting individuals from this requirement based on religious beliefs.

USDA has recently issued a policy clarification which changes both the penalties applicable to food stamp households that refuse to cooperate in resolving an SSN validation discrepancy and which exempts applicants from having to provide or apply for an SSN based on religious beliefs.

III. PROGRAM IMPLICATIONS

A. Food Stamps

- 1. A very small number of households will be subject to disqualification for refusing to cooperate in resolving an SSN validation discrepancy. This is because most discrepancies are resolvable by completion of an SS-5 (application for social security number).
- 2. A very small number of applicants are likely to refuse to cooperate in providing or applying for an SSN because of a valid religious belief.

B. Public Assistance

Public assistance regulations do not allow a waiver from the requirement to provide or apply for an SSN based on religious beliefs. Such PA households, if otherwise FS eligible, would be processed for food stamps as a mixed household including the non-PA SSN religious objector as a food stamp household member.

IV. REQUIRED ACTION

- A. Food stamp households that refuse to cooperate in resolving a Social Security Number (SSN) validation discrepancy are to have their food stamp cases terminated. If one member of the household refuses to cooperate in the validation process, the agency must determine if there is another household member who is able and is willing to cooperate in resolving the discrepancy before terminating the household. Such households subject to termination are to be issued a timely notice of adverse action informing them that their food stamp benefits are being terminated for refusing to cooperate in furnishing correct information to enable the agency to verify a household member's Social Security Number.

A household that has been terminated for failing to cooperate in resolving an SSN validation discrepancy may reapply for food stamps but will not be eligible until they cooperate in resolving the SSN discrepancy.

- B. Food stamp household members who refuse to provide or apply for an SSN because of a valid religious belief are not to be disqualified from Food Stamp Program participation. They are to be included as FS household members if otherwise eligible. Documentation must clearly be recorded in the case file if household members indicate they refuse to provide or apply for an SSN because of a valid religious belief. This documentation may include obtaining written or verbal confirmation from the religious organization the individual is a member that providing of an SSN by its members is in conflict with its religious doctrine.

V. SYSTEMS IMPLICATIONS

Social Security Number Code "4 - SSN Not Applied For" is to be entered on the WMS case record for household members that refuse to provide or apply for an SSN because of religious beliefs.

VI. EFFECTIVE DATE

This directive is effective August 1, 1990.

Oscar R. Best, Jr.
Deputy Commissioner
Division of Income Maintenance