



## Child Care and Development Fund Social Security Numbers: Reporting Guidelines

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### **I. Introduction**

This Technical Bulletin addresses questions about the reporting of Social Security Numbers (SSNs) on the ACF-801 report and the use of data received by the Child Care Bureau. The summary below provides guidelines from federal statutes and regulations.

### **II. Basic Guidelines on Social Security Number Reporting**

#### *How will the Child Care Bureau use the data sent by the States?*

Data from the reports sent by the States will be used for research to provide a summary and analysis of the status of child care in the United States, which the Secretary of the Department of Health and Human Services is required to report biennially to Congress<sup>1</sup> under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).<sup>2</sup> The findings will be used in the aggregate solely for research purposes, in accordance with the Privacy Act of 1974.

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<sup>1</sup>42 USC 9858j.

<sup>2</sup>Public Law 104-193.

## ***Why are Social Security Numbers important in the data reported by the States to the Child Care Bureau?***

The Child Care Bureau requires that States report head of household SSNs as part of their case-level reports as specified in the Child Care and Development Fund (CCDF) Final Rule.<sup>3</sup> The reporting of SSNs is necessary for the Child Care Bureau to study the effects of the federal child care legislation on families over time. This will enable the researching of critical policy questions such as whether participation in CCDF programs helps families requiring child care to maintain stability in employment and in child care placements. Information gained from these studies will be valuable for those developing child care programs and policies at the state and local, as well as national level.

The Social Security Number is the only unique identifier which remains constant, regardless of residence, especially in States where county-based case identifiers are used. Without a case-specific data element such as the SSN, it will not be possible to conduct longitudinal studies tracking data across reporting periods. Instead, the data collected will provide information on a population for each discrete reporting period, but will not allow for an analysis of changes to case units over time.

There may be some families whose head of household does not yet have a SSN. For those in training/education programs, States may establish (and report) a temporary number for the head of household until that individual receives an SSN. In cases where a child in protective services is identified as the head of household for reporting purposes, States may also establish (and report) a temporary number for these cases pending receipt of an official SSN.

Some concern has been expressed that requiring SSNs will prohibit the participation of families who have recently immigrated to the United States. The policy of the CCB, as stated in its Program Instruction (ACYF-PI-CC-98-08, available on the CCB's Web site at <http://www.acf.dhhs.gov/programs/ccb/policy/fpb-pi2.htm>) is that only the citizenship and immigration status of the **child** must be verified to determine eligibility for participation in CCDF programs.<sup>4</sup>

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<sup>3</sup>45 CFR 98.71(a)(13).

<sup>4</sup>“For implementing the verification requirements mandated by [T]itle IV of PRWORA, only the citizenship and immigration status of the child, who is the primary beneficiary of the child care benefit, is relevant for eligibility purposes.” (ACYF-PI-C-98-08)

***Can States submit substitute case numbers to the Child Care Bureau where individuals have not reported their SSNs?***

Since it is important that States send in their case-level reports, States may submit interim numbers in cases where there is none at present, but must also footnote the information as such. In addition, States should take measures to obtain these missing numbers, to provide the most complete data possible for the analysis of the effects of the CCDF.

***Are children's SSNs necessary?***

While children's SSN (element 16) is optional, the Bureau requires that SSNs of children in protective service cases be reported in place of the head of the family (element #3). This requirement ensures that the system will not generate missing data error messages and allows the system to match for longitudinal research studies.

***How will confidentiality of SSNs be maintained?***

All State submissions of SSN information will be through the Social Security Administration's CONNECT:Direct secure transmission lines. All research will be done based on the matching of case numbers over time and **never** linked to individual family identities.

**III. Conclusion**

This Bulletin has provided basic answers to frequently asked questions about the reporting of SSNs. Your State may have more specific questions regarding SSN submission. For further assistance, contact the Child Care Automation Resource Center.