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DATE

May 24, 2023

OF INTEREST TO

County Directors

Social Services Supervisors and
Staff

Financial Assistance Supervisors
and Staff

Tribal Nation Directors

Employment Services Providers

Community Partners Agencies
and Advocates

Resettlement Network Service
Providers

ACTION/DUE DATE

Please read information and
prepare for implementation

EXPIRATION DATE

May 24, 2025

Non-citizens Applying for a Social Security Number for Cash and Food Programs

TOPIC

This bulletin provides information on non-citizens who do not have a Social Security Number (SSN), how a county or Tribal Nation may know if a person has applied for an SSN, and what a county or Tribal Nation must do to help a person apply for an SSN.

PURPOSE

To provide guidance to eligibility workers about how non-citizens may apply for and receive a Social Security Number (SSN).

CONTACT

For Minnesota Family Investment Program (MFIP), Diversionary Work Program (DWP), Supplemental Nutrition Assistance Program (SNAP), Refugee Cash Assistance (RCA), General Assistance (GA), Housing Support (GRH), and Minnesota Supplemental Aid (MSA), submit policy questions to PolicyQuest.

Contact the TSS Help Desk for all MAXIS related questions.

SIGNED

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TERMINOLOGY NOTICE

The terminology used to describe people we serve has changed over time. The Minnesota Department of Human Services (DHS) supports the use of "People First" language.

I. Background

This bulletin provides information regarding non-citizens who do not have a Social Security Number (SSN).

Cash¹ and food programs require that all participants either have an SSN or have applied for an SSN. This rule applies to adults and children² who are applying for benefits. Once a person has applied for an SSN, there is no timeline in which the county or Tribal Nation should expect a person to have received their SSN from the Social Security Administration (SSA). The SSA can take a long time to process the application.

There are many different documents that a non-citizen might have to show that they applied for an SSN. This bulletin outlines the different documents that a county or Tribal Nation must accept as verification that a person has applied for an SSN.

When a non-citizen refuses to comply with the SSN application process or deliberately chooses to not provide an assigned SSN, that person is ineligible for benefits.

This bulletin will explain:

1. How a county or Tribal Nation eligibility worker can determine if a person has already applied for an SSN, and
2. What a county or Tribal Nation worker is required to do to help a person apply for an SSN when they have not already applied.

II. Glossary

1. Employment Authorization Document (EAD): A document authorizing non-citizens to work in the United States for a certain time period. Adults and children often use these documents that look like a driver's license as their only official form of identification in the United States.
2. Form I-765 Application for Employment Authorization Document: A United States Citizenship and Immigration Service (USCIS) form that certain non-citizens use to apply for an Employment Authorization Document.
3. Receipt Notice: The document USCIS sends to non-citizens to acknowledge that USCIS received the non-citizen's application for an immigration benefit. This notice is typically delivered within 2-3 weeks.
4. United States Citizenship and Immigration Service (USCIS): The federal agency that oversees lawful immigration to the United States. Non-citizens apply to this agency to receive an immigration benefit.
5. Non-work SSN: A Social Security card that shows the name and Social Security Number for a person and has the restriction "NOT VALID FOR EMPLOYMENT". The SSA issues a non-work SSN to non-citizens who:

¹ Refugee Cash Assistance (RCA) does not require an SSN. This bulletin does not apply to RCA. See [Combined Manual 30.03.01 \(Processing RCA Applications\)](#).

² MFIP and DWP members in the assistance unit who are qualified non-citizens and victims of family violence are not required to have or apply for an SSN. See [Combined Manual 12.03 \(Providing/Applying for an SSN\)](#).

- a. Are lawfully admitted to the United States without work authorization from DHS, but have a valid non-work reason for needing a Social Security Number; or
 - b. Need a number because of a federal law requiring a Social Security Number to get a public benefit or service.
6. [SS-5](#): Social Security Card Application used by the Social Security Administration.

III. How to determine if a person has already applied for an SSN

Cash³ and food programs require that all participants either have an SSN or have applied for an SSN. Sometimes it is difficult to determine if a person has applied for an SSN.

Follow the steps below for each household member to determine if they have applied for an SSN:

Step 1: Ask the following questions in order. The first time the person answers “Yes”, go to the noted section.

- A. Was the [SS-5 Application for a Social Security Card](#) to the Social Security Administration completed?
 - I. If yes, See Section IV below.
- B. Did they apply for a Social Security Number through their Employment Authorization Document (EAD) application?
 - I. If yes, See Section V below.
- C. Did the government help them apply for an SSN through their resettlement process in the United States?
 - I. If yes, see Section VI below.
- D. Have they started working on applying for an SSN, but they have not officially applied with the SSA yet?
 - I. If yes, see Section VII below.

Step 2: If the person answers “No” to all questions in Step 1:

Ask if they have applied for an Employment Authorization Document (EAD):

- a. If yes, and they do not know whether they applied for their SSN on that application, refer them back to their attorney, accredited representative, or the person who helped them apply for the EAD and review that application.
 - i. Have the person look for question #14 on the EAD application and see if they marked “Yes” to applying for an SSN through that form. If they did mark “Yes” on question #14, then they have applied for an SSN. See Section V below.

³ Refugee Cash Assistance (RCA) does not require an SSN. This bulletin does not apply to RCA. See [Combined Manual 30.03.01 \(Processing RCA Applications\)](#).

- ii. If they did not mark “Yes” to question #14 on the EAD application, have them begin the process of applying for a non-work SSN. See Section VII below.
- b. If no, they have not applied for an EAD and have them begin the process of applying for a non-work SSN. See Section VII below.

Step 3: If the person still does not know after reviewing all scenarios in Steps 1 and 2:

Submit a Policy Question along with all immigration documents and SAVE report. MN DHS will review the case and get back to the worker with next steps.

IV. Non-citizens who applied for an SSN through the SS-5 Application for a Social Security Card.

Some non-citizens will have already filled out the SS-5 and submitted it to the SSA.

- Accept the following as verification of application for SSN:
 - A receipt or notice from the SSA that is evidence that the person has begun the SSN application process or has applied for an SSN **OR**,
 - A third-party attestation that a person has applied for an SSN.
- Non-citizens who applied for an SSN have met the standard to be eligible for public benefits.
- Once non-citizens receive their SSN, it is their responsibility to provide it to the county or Tribal Nation.
- See MAXIS instructions in Section IX below.

V. Non-citizens who applied for an SSN as a part of their Employment Authorization (EAD) Application

Many non-citizens apply for their Social Security Number (SSN) as a part of their immigration application for an Employment Authorization Document (EAD). Within the EAD application, there is a question that asks if the person wishes to apply for an SSN. Most non-citizens mark yes and, once they mail in this application, they have applied for an SSN.

- Accept the following as verification of application for SSN:
 - Receipt notice from USCIS stating that the person had applied for an EAD along with a copy of the I-765 application that shows the person marked “yes” on question #14 **OR**,
 - Third-party attestation that a person has applied for an SSN through their EAD application.
- Non-citizens who applied for an SSN on their EAD application have met the standard to be eligible for public benefits.
- Once non-citizens receive their SSN, it is their responsibility to provide it to the county or Tribal Nation.
- See MAXIS instructions in Section IX below.

VI. Non-citizens who had the government's help with applying for an SSN as a part of their resettlement process in the United States

- Accept the following as verification that a person has applied for an SSN:
 - A Travel Authorization Letter from the Department of State or the Department of Homeland Security that says they have applied for a Social Security Number.
 - To verify this, look for the following language on the Global Boarding Letter/Refugee Travel Document, issued by the Bureau of Population Refugees, and Migration (PRM):
 - “This letter also serves to confirm that the above-named individual(s) applied for a Social Security number(s) via form I-765, as of their date of entry to the United States. Most applicants should receive their Social Security cards within two weeks of approval of their EAD application from USCIS.”
- Non-citizens who applied for an SSN as a part of the resettlement process have met the standard to be eligible for public benefits.
- Once non-citizens receive their SSN, it is their responsibility to provide it to the county or Tribal Nation.
- See MAXIS instructions in Section IX below.

VII. Non-citizens who are in the process of applying or need to start the process to apply for an SSN

Sometimes it takes time for non-citizens to apply for an SSN.

People can follow one of the two following pathways to apply for an SSN:

1. Begin the online application through the Online Social Security Number Application Process (OSSNAP).
 - a. People who apply through OSSNAP have 30 days to show evidence that they started their application through OSSNAP and an additional 45 days from the OSSNAP receipt notice date to go in person to the SSA and apply for their SSN.
2. Apply in person at the SSA.
 - a. People who apply in person at the SSA have 30 days to show evidence that they applied for an SSN.

Direct people to start an application with the new online option detailed below.

People can begin the process to apply for an SSN by starting their application process through the SSA's [online system called OSSNAP](#).

- The fastest and most effective way to start an application for an SSN is through the OSSNAP online process. This ensures a faster appointment at the SSA and more accurate information in the SSA system.

- Accept the following as verification that a person has applied for an SSN:
 - The OSSNAP system notice that shows a person has begun the application process, **OR**
 - A third-party attestation that a person has applied for an SSN through the OSSNAP system or in-person at the SSA.
- Once a person applies for an SSN with OSSNAP, the system will prompt people to go to their local SSA office with required documentation (including any immigration documents) within 45 days.
 - **TIKL for 45 days out from the date they applied online and follow up with the client to make sure they have gone in person to apply for their SSN.**
 - If the person does not go in person and apply for their SSN within this 45-day window that person is ineligible for benefits.
- Once non-citizens receive their SSN, it is their responsibility to update the county.
- See MAXIS instructions in Section IX below.

VIII. Non-citizens who do not have work authorization will need a letter from the county or Tribal Nation to apply for a “Non-work SSN”:

Non-citizens who do not have work authorization and who want to apply for public benefits can apply for a non-work SSN because it is a requirement to apply for public benefits.

NOTE: This does not apply to Refugees, Afghan or Ukrainian Humanitarian Parolees because they are work authorized along with certain immigration status/classifications.

- Afghan Humanitarian Parolees and Ukrainian Humanitarian Parolees with the following I-94 codes are automatically work authorized as of December 22, 2022.
 - These people do NOT need the county or Tribal Nation non-work SSN letter.
 - Afghans – OAR
 - Ukrainians – UHP or DT
 - People who are Afghan or Ukrainian that do not have one of the above codes on their I-94 still need the non-work SSN letter from the county or Tribal Nation.

Counties and Tribal Nations must help non-citizens who do not have employment authorization by writing a letter to the Social Security Administration (SSA) in support of the person’s application for public benefits. A copy of this template letter is on SIR under Worker Resources, titled Sample County Letter for Non-Work SSN.

For metro counties (Hennepin, Ramsey, Anoka, Dakota, Carver, Scott, Washington, Chisago, and Isanti):

- Only certain managers and supervisors at county or Tribal Nations can sign a non-work SSN letter. The form “County Official Signature for Non-work SSN” is on SIR under Worker Resources. This letter must be signed by the designated representative(s) that SSA has established with the local agency. MN DHS does not have access to the list of representatives.

- If your agency does not know who their signatory is they can fill out a new request as noted above to the Social Security Administration.
- Complete the form and fax the document to the SSA and send the hard copy with the wet signature to the Social Security Administration. Save a copy in the case file.

For Greater Minnesota counties:

- Visit ssa.gov to find your local field office in Minnesota.
- Call your local field office and ask for an SSA manager.
- Ask the SSA manager what their process is for helping a person receive a non-work SSN and follow their instructions.

IX. MAXIS instructions

For people who have not yet applied for a SSN, follow the normal application process, and enter all case information into MAXIS.

- Pend the application and do not approve benefits until the applicant(s) provides verification that they have applied for an SSN. For Expedited SNAP, follow normal process.
- MEMB panel should be coded as “N – SSN Not Prvd”
- Send out a [DHS-2919 \(Verification Request Form\)](#) to request proof of verification that they applied. TIKL for 10-days for the household to respond to the request.
- After the 10-day period has ended:
 - If the person contacts you and the SSN is provided, update the MEMB panel to “P – SSN Provided, Ver Pending”. Approve benefits if all criteria are met.
 - If the person reports they are still working on getting their SSN and have not received their SSN yet, this is considered in compliance with the application process. See the section below on when they have applied for SSN.
 - If the person does not contact the county or Tribal Nation or respond, you may send out a SPEC MEMO or contact the client to remind the unit of the missing verification. Do not deny the application until day 30.
 - As a reminder an application can be pended over 30 days if there is good cause.
- CASE/NOTE all actions taken, including whether good cause was granted.

When the person states that they have applied for an SSN, the verification field on the MEMB panel will need to be coded as “A – SSN Appl for” for each assistance unit member. Do not deny or terminate benefits pending verification. MAXIS will trigger a PEPR message with this coding.

Follow the instructions below to follow up with the person from when they apply to when they receive their SSN:

- When a PEPR message is received after 60 days, attempt to contact the person to follow-up on their SSN application. If the attempt fails, send out the [DHS-2919 \(Verification Request Form\)](#) requesting either

the person contact the agency or provide the SSN. The SSN card is not required unless SSA cannot verify the SSN via the interface.

- Delete the PEPR message and TIKL for 10-days for the household to respond to the request.
- After the 10-day period has ended:
 - If the person contacts you and the SSN is provided, update the MEMB panel to “P – SSN Provided, Ver Pending”.
 - If the person reports they are still working on getting their SSN and have not received their SSN yet, this is considered in compliance with the application process. Grant good cause and do not terminate benefits. Do not update the MEMB panel.
NOTE: A PEPR message will continue to be issued every 30-days every time the MEMB panel is coded with “A – SSN Appl for”. Follow-up is required when the PEPR message is received.
 - If the person does not contact the county or Tribal Nation or respond, the individual without an SSN is ineligible for benefits. Update the verification field on the MEMB panel to “N – SSN Not Prvd” for all assistance unit member whose SSN was requested. Terminate or reduce benefits the next available month allowing proper 10-day notice of adverse action.
- CASE/NOTE all actions taken, including whether good cause was granted.

X. Good cause

Good cause exists when the person is in the process of applying for an SSN or has already applied but is awaiting their SSN card. There is no time limit on how long good cause can be granted due to the complex process. When good cause is granted, follow-up is required per the instructions above in the MAXIS section. Enter clear case notes to document all actions taken.

MN DHS is updating Combined Manual [0012.03 \(Providing/Applying for SSN\)](#) to be consistent with the guidance in this bulletin.

Americans with Disabilities Act (ADA) Advisory

This information is available in accessible formats for people with disabilities by calling (651) 431-4049 (voice) or toll free at (800) 657-3739 or by using your preferred relay service. For other information on disability rights and protections, contact the agency’s ADA coordinator.