

**DSS ADMINISTRATIVE LETTER NO. ECONOMIC SERVICES 4-2008
(Food and Nutrition Services)**

Guidance on Undocumented Immigrants with Multiple Names and Social Security Numbers

TO: County Directors of Social Services

ATTENTION: Food and Nutrition Services Managers and Supervisors

DATE: July 16, 2008

SUBJECT: Undocumented Immigrants with Multiple Names and
Social Security Numbers

EFFECTIVE: Upon Receipt

I. GENERAL INFORMATION

The purpose of this letter is to provide policy clarification to county departments of social services on the procedures for addressing the use of multiple names and/or social security numbers based on citizenship and immigration status.

II. POLICY PROCEDURES

It continues to be the responsibility of the agency to determine the eligibility of all members who are to be included in the Food and Nutrition Services application.

Duplicate Names and/or Social Security Numbers

During the course of the interview/ application process, it may be disclosed that alternative names and/or social security numbers are being used. The agency does have a responsibility to pursue all verification. Food and Nutrition Services policy requires that the agency include income and resources of all individuals in the Food and Nutrition Services unit regardless of their citizenship or immigration status.

Verification of income must be pursued under all name(s) and/or social security number(s) provided during the course of the application process. The methods used to calculate benefits must be based upon data that will yield the most accurate financial information for determination of benefits.

Reporting of Illegal Presence in the United States

A response from Systematic Alien Verification Entitlement (SAVE) showing no record of an individual or an immigration status making the individual eligible for benefits is not alone considered evidence that an individual has an illegal presence in the United States. An agency only "knows" if an individual is in the country unlawfully, if the immigrant gives the agency a documentary evidence, such as a Final Order of Deportation.

County Department of Social Services (DSS) offices must make a report to the Economic Services Section only if it determines that there are non-citizens who are illegally present in the United States, as evidenced by a Final Order of Deportation. Such reports can only be made by the director or designee of the county DSS. The Economic Services Section staff will forward the relevant reports to the United States Citizenship and Immigration Services (USCIS). If a report is necessary, it must include the person's name, address, the reason for the referral and any other identifying information.

All rules of confidentiality must be applied in regard to citizenship/alien status. It is a breach of confidentiality to discuss the citizenship/alien status of an individual with employers, landlords, etc.

Program Integrity Referrals

Referrals to local program integrity units must be completed only if an individual has willfully and knowingly misstated, provided incorrect or misleading information to obtain or attempt to obtain benefits for which the individual is not eligible.

Policy which supports this administrative letter can be found in the [Food and Nutrition Services Certification Manual](#) and in the [United States Code of Federal Regulations](#).

III. IMPLEMENTATION INSTRUCTIONS

These procedures are effective immediately.

If you have any questions, please contact your Food and Nutrition Services & Energy Programs Representative.

Sincerely,

A handwritten signature in black ink that reads "Dean Simpson". The signature is written in a cursive style with a large, sweeping "D" and "S".

Dean Simpson, Chief
Economic Services Section

Sherry S. Bradsher
JoAnn Lamm
Food and Nutrition Services & Energy Representatives
Program Compliance Representatives
Local Business Liasons