

Collecting Social Security Numbers (SSNs) are critical because they enable ETA to perform two tasks that it is required to do: 1) report the impact of Recovery Act funds and their effectiveness and 2) assess the status of individual grants to ensure that individuals are receiving services and finding employment through these grants. Collecting SSNs enables ETA to calculate the Common Performance Measures, which are ETA's standard metrics for assessing the status of grants and comparing the performance of specific programs to other programs to determine their overall effectiveness. If grantees did not collect SSNs and provide them to ETA to calculate the Common Measures for them, then grantees would be forced to calculate the Common Measures themselves using supplemental data, which is extremely burdensome. However, to reduce the burden on grantees, ARRA HGEI grantees will collect and record participants' SSNs for all participants served with grant funds through the Recovery Act Data (RAD) system. ETA will then track Common Performance Measures on behalf of the grantee, which includes tracking employment outcomes up to three quarters after an individual has stopped receiving grant funds. The aggregate information collected and reported to ETA will not contain any individual identifying information. ETA is working diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted through the RAD system. Further, ETA's IT department will be an active participant in the development and approval of RAD system data security measures, further ensuring data security.

ARRA HGEI grantees will store and submit participant-data, including SSNs, in the RAD system, which will be matched to wage records through a Departmental MOU with the Kansas Department of Commerce (Kansas). Once SSN data has been submitted by the grantee through the RAD system, the information is sent to Kansas via secure file transit protocol. Kansas submits SSNs to the Wage and Record Interchange System (WRIS) and Federal Employment Data Exchange System (FEDES), electronically matching wage data to SSNs through the Unemployment Insurance system and individuals employed in the Federal Workforce. WRIS and FEDES return wage record results to Kansas, which compiles into aggregate reports and returns aggregate results to ETA. These aggregate results do not include personally identifiable information. At no point during the process does DOL/ETA or other individuals have access to participant SSNs. Collecting SSNs and using them to calculate the Common Performance Measures is a standard, successful practice approved by OMB that is already used by a number of existing ETA grant programs, such as Community Based Job Training grants.