

PROGRAM MEMORANDUM 26-3

DATE: October 9, 2026
TO: Adult Education Program Staff
FROM: Nick Moore, Chief Adult Education and Learning Officer
SUBJECT: Collection and use of Social Security Numbers (SSNs) by ACCS Adult Education Programs

I. Purpose

The collection of Social Security Numbers is authorized for employment and wage record matching and federal performance reporting under the Adult Education and Family Literacy Act (AEFLA), Title II of the Workforce Innovation and Opportunity Act (WIOA), and applicable federal and state data-sharing agreements. This policy establishes the purpose for collecting SSNs, their authorized use, and the safeguards in place to protect student privacy.

II. Policy

Providing an SSN is voluntary, and Alabama Adult Education program services will not be denied as a consequence of failing to provide an SSN. Local programs must inform students of the purpose for collecting SSNs, how they will be used, and the safeguards in place to protect their information. If a student elects not to provide an SSN, the program is responsible for making reasonable follow-up attempts to obtain self-reported, supplemental employment information necessary to satisfy federal reporting and matching wage requirements.

III. Authorized Use of SSNs

- Verify employment and wage outcomes through approved wage record matching to meet federal reporting requirements for WIOA core performance measures
- Improve the accuracy of employment reporting
- Reduce the need for post-exit follow-up surveys with students
- Support evaluation of program effectiveness
- Demonstrate outcomes that support continued state and federal funding

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IV. Privacy and Confidentiality

SSNs must be protected in accordance with applicable federal and state privacy laws. Access to SSNs is limited to authorized personnel and may be used only for approved activities such as those listed above. Local programs must maintain appropriate safeguards to prevent unauthorized access, disclosure, or misuse of SSNs and must also comply with all federal, state, and Adult Education Division (AED) data security requirements.

V. Implementation Requirements

Students remain eligible for all Adult Education services, however, because employment outcomes cannot be verified without wage record matching, local programs must make reasonable post-exit follow-up efforts to obtain self-reported employment information required for federal reporting. Follow-up by in person, mailed, electronic surveys, or other documented methods approved by the Alabama Adult Education Division.

Examples of information collected during post-exit follow-up may include,

- A. Employment status
- B. Employment start date
- C. Wages
- D. Postsecondary enrollment
- E. Military service
- F. Other outcome measures required for federal reporting

VI. Responsibilities

The AED and local providers are responsible for ensuring that SSNs are collected only when voluntarily provided, used solely for authorized purposes, and protected in accordance with applicable federal and state privacy laws. All voluntarily provided SSNs must be securely entered and maintained within the states designated data system.

VII. Student Notification

The following is a sample of how staff may explain the purpose of collecting a student's Social Security Number (SSN) and respectfully ask the student to provide it. Programs may use or adapt this language when communicating with students.

- Providing your Social Security Number (SSN) is voluntary and is not required to receive Adult Education services. Your SSN will be protected in accordance with applicable federal and state privacy laws and used only for authorized wage record matching required for federal program outcomes reporting purposes. Providing your SSN may also support your participation in employment and workforce-related initiatives that do require SSNs for program participation. In addition, providing your SSN permits the Alabama Adult Education Division to verify employment outcomes without requiring you to participate in additional follow-up surveys after you exit the program. If you choose not to provide your SSN, program staff may contact you after program exit to obtain self-reported employment information needed to satisfy federal reporting requirements.

VIII. Legal Authority

- Adult Education and Family Literacy Act (AEFLA), WIOA Title II
- Family Educational Rights and Privacy Act (FERPA)
- Applicable federal and Alabama state privacy and confidentiality laws, regulations, and data-sharing agreements