

## **Screening Volunteers Without ID Using the Social Security Number (SSN) of 000-00-0000**

It's best of course to have forms of ID as indicated on the federal form I-9, Employment Eligibility Verification, see <http://www.uscis.gov/files/form/I-9.pdf>.

The issue here is that you want an alternative in order to do some due diligence on folks that do not have sufficient ID to get fingerprinted but who want the opportunity to contribute to the community by doing volunteer work.

So, we need to keep in mind that the bottom-line is **due diligence**. Due diligence is a moving target that is determined by a jury, and the absence of due diligence is negligence. To show due diligence, we are looking at efforts made by an ordinarily prudent or reasonable party to avoid harm to another party.

The worst case scenario is that a volunteer gives a fake name, and we "clear" the person under the fake name but in fact they are criminal and do something unfortunate in regard to a child, etc.

So, in trying to balance public safety, with the Church's desire to allow someone to volunteer that may not have sufficient ID for a fingerprint check, and keeping in mind that under these circumstances there is no absolute protection the church can obtain, we are looking at good faith, best practices that under the circumstances are something that a jury would find reasonable.

Our suggestion is to try to find at least two sources of "trusted" material that confirms at least that a person has held themselves out to third parties as the person they say they are. By "trusted", we mean some third party source independent of the volunteer's own statements that shows that the volunteer has been treated as the person they say they are. In addition another forms of ID such as a birth certificate, even if from a foreign county, is also relevant.

Example may be:

1. Utility bills addressed to the person at their address.
2. Other bills, such as newspaper and magazine subscriptions.
3. Phone records showing the person's name and address.
4. Lease in the person's name.
5. Birth certificate.
6. Credit cards or banking materials.
7. Materials provided by other public agencies that show the volunteer's name, such as a bill from a health clinic (keeping the medial material private of course)

The idea is to establish that there is a history of the volunteer holding themselves out as the person they say they are to third parties. The further back in time the better.



## Employment Screening Resources



We would also suggest that in addition to these martial, that the Church may consider **requiring** a birth certificate so we can have date of birth and the name on the birth certificate, that can be confirmed by these other materials.

### NOTE:

For purposes of data entry into our systems during the screening process when an individual has no ID or valid SSN we will require that the number entered is "000-00-0000". This is so that everyone is aware that the individual is not attempting to provide another person's number or make a "fake" one up.

When we are provided with this number and we run the Volunteer Safety 1<sup>st</sup> service, the SSTrace portion will report the following:

#### Invalid SSN Reported 000-00-0000

The SSN appears to be an invalid number based on criteria the SSA provides to the public on how to interpret the number sequence. The SSN is divided as follows: the area number (first three digits), group number (fourth and fifth digits), and serial number (last four digits). No SSN's with an area number in the 800 or 900 series, or "000" area number, have been assigned. No SSN's with a "00" group number or "0000" serial number have been assigned. For additional information on this topic please visit the Social Security Administration website at [www.socialsecurity.gov](http://www.socialsecurity.gov).

As an employer if you are concerned about a SSN not being valid for a particular applicant you can access the Social Security Number Verification Service (SSNVS) at <http://www.socialsecurity.gov/employer/ssnv.htm>. You can also call 800-772-1213, your Employer Identification Number (EIN) is required.

**IMPORTANT NOTICE:** The Safe Hire Screening Program is NOT the same as an FBI search or state fingerprint program. State (public) and private proprietary databases are compiled from a number of sources and may not be accurate or complete. The appearance of a person's name is not an indication that the person is a criminal any more than the absence of name indicates that the person is not a criminal. Any positive match MUST be verified by reviewing the actual court records. Any lack of a match does not mean the person is "cleared." Alias names are not included in any of the services mentioned and need to be searched independently.

v1-09

Page # 2 of 2