



Office of Temporary and Disability Assistance

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Administrative Directive Memorandum

Section 1

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| Transmittal: | 25-ADM-05 |
| To: | Social Services District Commissioners |
| Issuing Division/Office: | OTDA – Audit & Quality Improvement – Program Integrity |
| Date: | July 1, 2025 |
| Subject: | Use of Equifax – The Work Number (TWN) for Child Support |
| Suggested Distribution: | Child Support Program Coordinators, Support Collection Unit Supervisors, Directors of Temporary Assistance (TA), Supplemental Nutrition Assistance Program (SNAP), Employment Coordinators, Home Energy Assistance Program (HEAP), Medicaid (MA), and Services, District TWN Web Managers, Child Care Supervisors, Child Care Assistance Staff, All Current and Future TWN Users. |
| Contact Person(s): | Rebecca Frederick, OTDA Audit & Quality Improvement (A&QI) – Program Integrity (PI) Unit, 518-408-0006, Rebecca.Frederick@otda.ny.gov Jennifer Pelletier, OTDA A&QI – PI Unit, 518-408-5853, Jennifer.Pelletier@otda.ny.gov |
| Attachments: | Attachment 1 – The Work Number (TWN) Training and User Guide Attachment 2 - OTDA Global Non-Disclosure Agreement (NDA) Attachment 3 – Annual Child Support Certification for Completion of The Work Number (TWN) Training and User Guide Course and Receipt of Required Signed Non-Disclosure Agreements |

Filing References

| Previous ADMs/INFs | Releases Cancelled | Dept. Regs. | Soc. Serv. Law & Other Legal Ref. | Manual Ref. | Misc. Ref. |
|---------------------------------------|--------------------|-------------|-----------------------------------|-------------|------------|
| 06-INF-13, 09-INF-12, 24-ADM-07 | | | SSL 132 | | |

Section 2

I. Purpose

This Administrative Directive Memorandum (ADM) is to advise the social services districts (districts) that child support services provided after parentage has been established, including establishing, modifying or enforcing orders of support under the Child Support Program, have been added as a permissible purpose when accessing The Work Number (TWN) for employment and income verification through the Equifax contract held by the Office of Temporary and Disability Assistance (OTDA). This is in addition to the already approved permissible purposes of determining eligibility for the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance (TA), the Home Energy Assistance Program (HEAP), Medicaid (MA), and Child Care Assistance.

II. Background

OTDA maintains a contract with Equifax Workforce Solutions, which allows districts to utilize Equifax's TWN web-based portal to verify income for program eligibility purposes. Access is requested through your District TWN Web Manager for those with a business need, and once granted, the web service may be accessed at <https://theworknumber.com>. Historically the contract has covered the permissible purposes of assisting in eligibility determinations for governmental benefits of SNAP, TA, HEAP, MA, and Child Care Assistance.

III. Program Implications

The use of TWN for the purpose of child support services is now approved as a permissible purpose under the contract with Equifax Workforce Solutions. **Once parentage has been established** and subject to Section IV below, districts may begin using this web service to obtain verified employment and income information for the purposes of establishing, modifying, or enforcing orders of support.

The contract price is \$5.99 when a positive TWN match ("hit") is returned. **Districts are responsible for 34% of the cost when TWN is used for the purposes of child support services.** Notably, a lookup may result in more than one hit for the submitted individual. Example: If a lookup is done for John Smith (i.e., John's SSN or name and identifying information is input into TWN) and TWN returns five hits, then the cost when TWN is used for the purpose of child support services would be \$29.95 (\$5.99 x 5). The cost to the district would be \$10.18 (\$29.95 x .34).

IV. Required Action

A. Grant Access to TWN

1. District Users of TWN

The Social Services District TWN Web Manager may only grant a district employee access to TWN upon verification by a district supervisor, who maintains supervisory responsibility over the district employee user, of a business need to

verify employment and income information related to eligibility determinations for the above-stated program types or for permitted child support purposes.

Users granted access must complete training on the proper use of TWN prior to their first use. District TWN Web Managers must provide this ADM and *The Work Number (TWN) Training and User Guide (Attachment 1)* to all TWN users at their location. Additionally, all TWN users must have their training coordinator register them annually to complete *The Work Number (TWN) Training and User Guide* course located within Training Space. This training is required to convey the importance of protecting Personally Identifiable Information (PII).

2. Subcontractor Users of TWN

If subcontractors will require access to TWN, OTDA must be notified prior to granting them access to the system, as subcontractor use must be approved by both OTDA and Equifax. District TWN Web Managers looking to add a subcontractor must request approval from OTDA (contact information is listed on this ADM), identifying the proposed subcontractors and the reason they require use. Access for the subcontractor to start using TWN may not be provided until approval is granted by OTDA. Additionally, subcontractors are not only required to complete *The Work Number (TWN) Training and User Guide* course annually but must also sign the *OTDA Global Non-Disclosure Agreement (NDA) (Attachment 2)* prior to using the web service.

B. Document Completion of Required Trainings and Signed NDAs

Once *The Work Number (TWN) Training and User Guide* course located within Training Space has been finished, individuals must print the certificate of completion displayed at the end of the training module. That certificate and, for subcontractors, the completed and signed annual NDAs, must be provided to the District TWN Web Managers.

District TWN Web Managers must keep a record of the completed trainings and signed NDAs. If requested for audit purposes, such documentation must be provided to OTDA.

C. Certify Completion of Required Trainings and Signed NDAs to the State Child Support Program

District Child Support Coordinators or their designees must certify to the Deputy Commissioner of the Division of Child Support Services by **March 15** of each year that the required TWN trainings have been completed and requisite NDAs have been signed for all district and contract staff with access to use TWN for child support services. This certification is provided through use of the *Annual Child Support Certification for Completion of The Work Number (TWN) Training and User Guide Course and Receipt of Required Signed Non-Disclosure Agreements (Attachment 3)*.

D. Review List of Active Users

District TWN Web Managers must review the list of active users on an annual basis to ensure that the users are actively employed at the district and to verify with the applicable district supervisors, or responsible parties, that access to TWN is still required for the purpose of their position/duties. When users leave district service or no longer have a business need to use TWN, their access should immediately be removed from TWN. Additionally, if any previously approved subcontractors are removed or no longer using the service, the District TWN Web Manager should notify OTDA so that the subcontractor can be removed from the list of approved users.

E. Use of TWN for Lookups

When TWN is used for child support services, the district must select “Child Support” under the Program Type field. **It is extremely important that this instruction be followed** as there are different security requirements surrounding child support services lookups, and both Equifax and OTDA will need to identify these lookups for auditing purposes.

All TWN lookups fall under the Fair Credit Reporting Act (FCRA). The full FCRA language can be found here: [Fair Credit Reporting Act \(ftc.gov\)](https://www.ftc.gov). Therefore, TWN must not be accessed for personal reasons or to provide Data to an unauthorized third party. All documents and materials containing TWN information must be kept secure and confidential as they contain PII. Staff must not disseminate, use, or permit the dissemination of TWN information in a manner that is not consistent with the purposes outlined in this ADM.

Consent of the consumer (applicant) **is required** to complete a lookup for SNAP, TA, HEAP, MA, and Child Care Assistance, and the applicant must be over 18. The signed applications LDSS-2921, LDSS-3174, and LDSS-4826 and OCFS-6025: Application for Child Care Assistance are sufficient for this authorization due to the language included in them. TWN lookups may not be completed on any applicant/recipient that has not provided that authorization.

Consumer consent **is not required** to complete a lookup for child support services. However, TWN lookups completed for child support services must be done only if: (1) the consumer report is needed for the purpose of establishing an individual’s capacity to make child support payments, determining the appropriate level of such payments, **or** enforcing a child support order, award, agreement, or judgment; **and** (2) parentage has already been established.

V. Systems Implications

TWN is a web-based platform through Equifax Workforce Solutions and may be accessed at <https://theworknumber.com>. Microsoft Edge or Chrome browsers should be used when

accessing TWN, and users are encouraged not to save or bookmark the link. These actions will help reduce the likelihood of technical issues and ensure that the latest version of the database is being accessed.

VI. Additional Information

Equifax performs permissible purpose audits on TWN lookups throughout the life of the contract, which requires that the lookups they are auditing have signed authorization. If the Vendor finds the absence of a required authorization, or that the lookup failed to meet the permissible purpose for an authorized program, it could result in the loss of TWN usage due to breach of contract. Additionally, a user who is responsible for an unauthorized access to Data may be subject to civil and criminal liability under the FCRA and punishable by fines and imprisonment.

VII. Effective Date

July 1st, 2025

Issued By:

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Title: Deputy Commissioner

Division/Office: Audit and Quality Improvement