Standards for Social Security Numbers

INSIDE THIS GUIDE:

This guide describes the importance of the Social Security Number (SSN) for the internal working of the CBX member processing system, tips for handling who have not been assigned this number, and instructions on how to modify the SSN on an existing record.

Last Revision date: July 22, 2026

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How CBX Uses Social Security Numbers

All CBX database files that store information about people and their relationships with the credit union contain a field for a Social Security Number (SSN). This field is used throughout CBX:

- For membership information in the MASTER and MSHIST (closed memberships) files.
- For non-member information in the MSNONMBR file.
- As a link between relationships such as joint owners, co-borrowers, and IRA beneficiaries.
- As the key identifying field in the Household Database.
- For backup withholding and tax reporting.
- For credit bureau reporting.
- For other specialty applications such as the Financial Institution Data Match (FIDM) program.

Invalid or duplicate SSNs can cause significant problems with many of these systems, leading to incorrect reporting to the IRS, backup withholding issues, incorrect routing of delinquency notices, and errors in your credit union's credit bureau reporting (or no reporting at all). Therefore, the integrity of Social Security Numbers in CBX files is especially important, whether creating new member and non-member records, or converting files from another platform to CBX.

Occasionally there will be a need for a credit union to create a member or non-member record for an individual who has not been assigned an SSN by the Social Security Administration (such as a foreign college student, a member wanting a foreign citizen to be named as beneficiary or joint owner, etc.). There may also be cases where a member wants to add an IRA beneficiary or joint owner but does not have access to the SSN for that individual. It is imperative that credit unions use a standardized method for assigning an "imitation" SSN to these individuals for use by CBX, so as not to overlap legitimate numbers used by actual members and non-member relationships.

In addition, the credit union must regularly monitor these imitation SSNs to avoid duplication and to update the appropriate CBX records whenever an actual SSN becomes available.

> ***IMPORTANT NOTE:*** *For the purposes of this discussion, a "duplicate" SSN is one that is shared by more than one individual person. CBX does allow for a member to have more than one membership account with the same SSN, but that SSN still represents the same person. Where duplicates become a problem is when the same SSN is set up to represent more than one person.*

Social Security Number Allocation Standards

From the Social Security Administration website:

> *"The Social Security Administration (SSA) changed the way Social Security Numbers (SSNs) are issued on June 25, 2011. This change is referred to as 'randomization.' The SSA developed this new method to help protect the integrity of the SSN. SSN Randomization will also extend the longevity of the nine-digit SSN nationwide.*
>
> *The SSA began assigning the nine-digit SSN in 1936 for the purpose of tracking workers' earnings over the course of their lifetimes to pay benefits. Since its inception, the SSN has always been comprised of the three-digit area number, followed by the two-digit group number, and ending with the four-digit serial number. Since 1972, the SSA has issued Social Security cards centrally and the area number reflected the state, as determined by the ZIP code in the mailing address of the application."*

The SSA website has more information about SSN allocation standards:

> **https://www.ssa.gov/employer/randomization.html**

Other historical information about Social Security Numbers can be found here:

> **https://www.ssa.gov/history/ssn/geocard.html**

Assigning Social Security Numbers

When creating a new membership or setting up a non-member record for any reason (IRA beneficiary, joint owner, co-borrower, etc.), if the individual cannot provide a valid SSN, the credit union should assign the next available imitation SSN using the following number schemes:

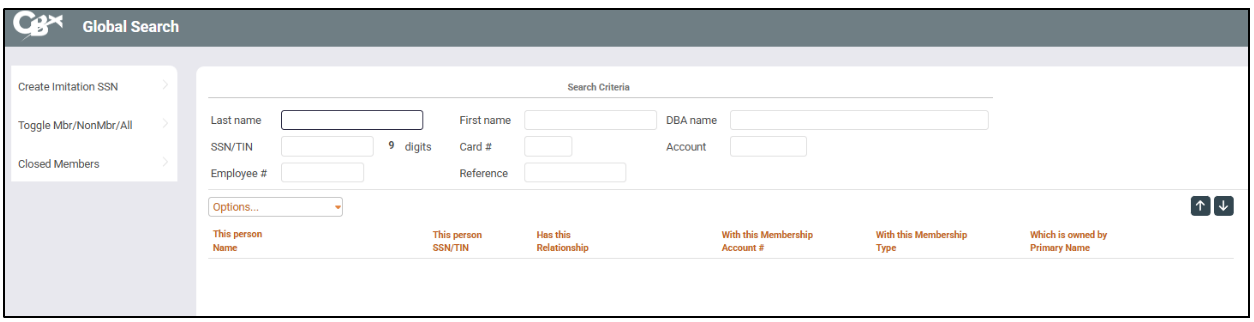
- **993-00-xxxx:** Members without a Social Security Number
- **995-00-xxxx:** Co-Borrowers/Additional Signers (non-members) without a Social Security Number
- **997-00-xxxx:** Joint Owners and IRA Beneficiaries (non-members) without a Social Security Number

If a non-member has already been entered on the system as a joint owner or IRA beneficiary using a 997-00-xxxx SSN, use that number when setting up a co-borrower record (or vice versa). The main reason for differentiating co-borrowers from other types of non-members is because of the unique issues associated with credit bureau reporting and delinquency notices. Using a different numbering scheme for an individual that is strictly set up as a loan co-signer will make it easier to identify and monitor these records.

Looking Up the Next Available Imitation SSN

1. From **Tool #3 *Open/Maintain Memberships/Accounts*** or **Tool #997 *Work with Non-Member Database***, use **Global Search** to display the following screen.

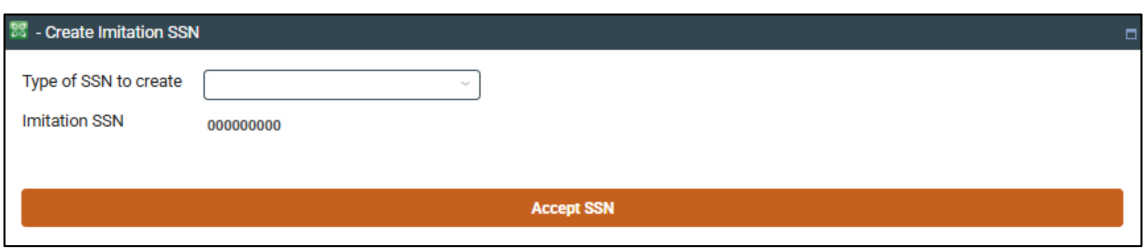
Tool #3 *Open/Maintain Memberships/Accounts* > Global Search



***CU*TIP:** Make sure to use **Global Search** when looking for an unused SSN. Regular Member Inquiry and Phone Operator will not include non-member records.*

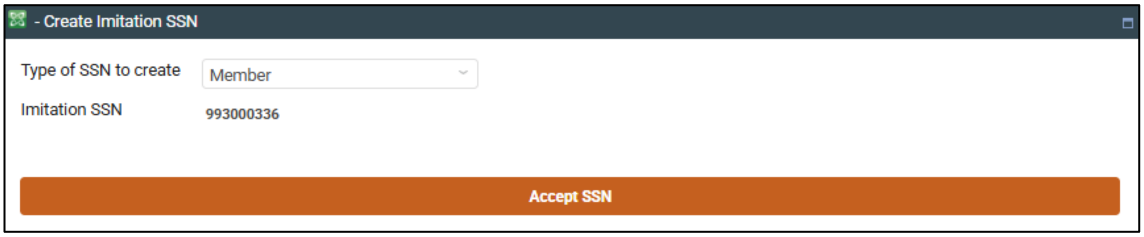
2. Click **Create Imitation SSN** to move to the following screen.

Global Search > Create Imitation SSN



3. From the dropdown menu, select the type of imitation SSN you want to select: *Member, Co-borrower/additional signer* or *Joint owner & IRA beneficiary*.

4. Use Enter and the next available Social Security Number will be generated based on the previous selection. Here we have selected to create an imitation SSN for a member.



5. Click **Accept SSN** to accept the Social Security Number.

These tips are also available in CBX Online Help! Just select the button while working on the Global Search screen or use Search or Index keyword "SSN."

Special Notes for the Loan Department

If a member or non-member record is created using an imitation SSN (such as for a foreign citizen), it is important that certain settings be changed to prevent invalid reporting or errors in daily CBX processing.

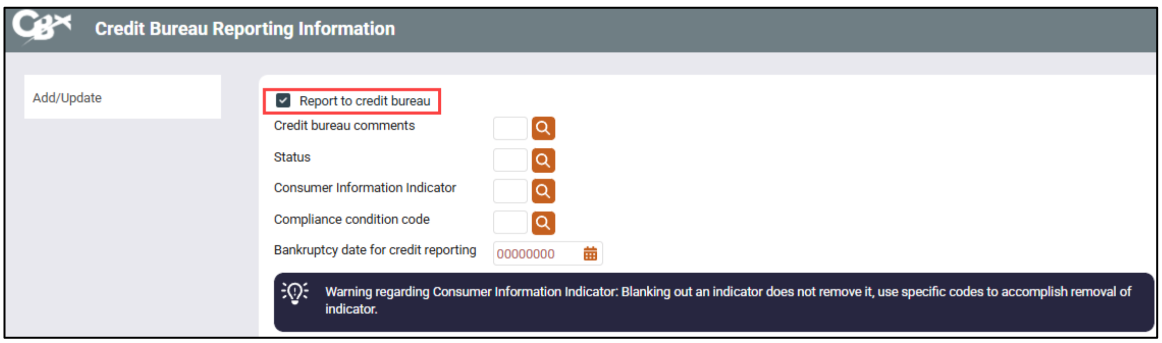
Reporting to the Credit Bureaus

Social Security Numbers are particularly important when reporting account information to the credit bureaus. If an invalid SSN is included in the monthly credit report tape, it may result in the entire tape being rejected. The credit bureaus routinely verify incoming data against existing files, and discrepancies between the information reported on the tape (name, address, etc.) and their files are checked carefully. If too many discrepancies are found, the entire tape is rejected. This affects ALL online credit unions, as all are included on the same credit bureau report tape.

Imitation SSN on a Primary Borrower

If the primary borrower uses an imitation SSN, use these steps to prevent the account from being reported to the bureaus:

1. Use **Tool #20 *Update Account Information*** and enter the loan account number, then click **Credit Reporting Info** button.



2. Remove the checkmark from the *Report to credit bureau* box.

Imitation SSNs on Co-Borrowers

In addition, if a loan account has one or more co-signers, and any co-signer SSN is duplicated in the credit union's member or non-member files, the system will pull the name from the first record it finds in the file that matches the SSN. This may not be the actual person listed as the co-signer, in which case the record would be considered as a discrepancy by the credit bureau.

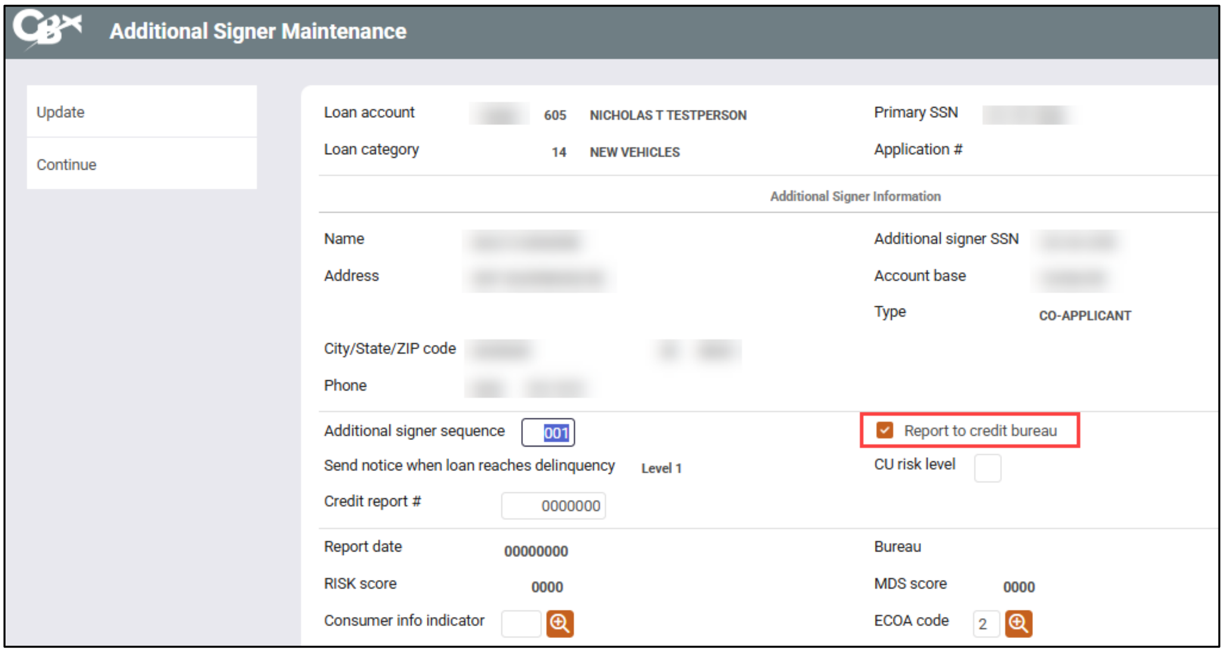
Because of these potential problems, you must monitor all loan accounts for any co-signers that have not been verified as having unique, valid SSNs. These additional signer records should be modified so that they DO NOT report to the credit bureau, until the co-signer SSNs can be verified, and the files cleaned up to eliminate the duplicates.

The following are steps to control whether a co-borrower is reported on your credit union's monthly credit bureau tape.

1. Use **Tool #51 *Miscellaneous Loan Maintenance*** and enter the loan account number. Then choose *Additional Signers* and use Enter to display the Additional Signer Summary screen.

> ***HINT:*** *For a pending loan application, access the loan application via the "Work with Existing Loan Request" Action Code (WE), then choose "Complete Loan App" on the Loan Recap screen. On the first page of the loan application, click the* ***Additional Signers*** *button to display the Additional Signer Summary screen.*

2. From the Additional Signer Summary screen, select the co-signer name in the list and use Enter or Select to display the following screen:



3. Remove the checkmark from the *Report to credit bureau* field (outlined in red).

> ***NOTE:*** *Up to two co-signers can be included on the credit reporting tape; if necessary, use the above steps to activate the flag for a different co-signer.*

Delinquency Notices for Co-Signers

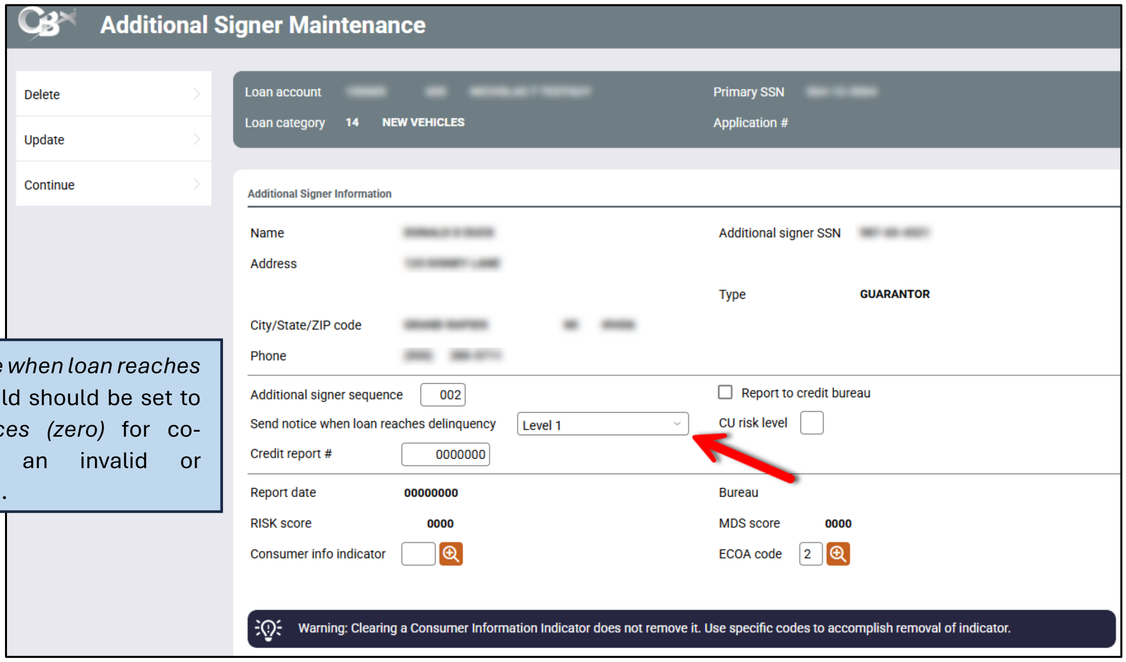
Like credit reporting, duplicate SSNs can cause problems when printing delinquency notices. When printing a delinquency notice for a co-signer, the system will locate the name and address from the first record it finds with that SSN. If there is more than one person in the file with the same SSN, the notice may be addressed to the wrong person. This not only causes confusion but potentially violates member privacy by reporting loan account information to an unauthorized person.

Therefore, if a loan co-signer shares a Social Security Number with any other member or non-member record, it is important that **the additional signer record be modified so that delinquency notes are NOT generated for that signer:**

1. Launch **Tool #51 *Miscellaneous Loan Maintenance*** and enter the loan account number. Then choose *Additional Signers* and select the co-signer to display the Additional Signer Summary screen.

HINT: *For a pending loan application, access the loan application via the "Work With Existing Loan Request" action code (WE), choosing* ***Complete Loan App*** *on the Loan Recap screen. On the first page of the loan application, click the* ***Additional Signers*** *button to display the Additional Signer Summary screen.*

2. From the Additional Signer Summary screen, select the co-signer name in the list and use Enter or Select to display the following screen:



The *Send notice when loan reaches delinquency* field should be set to *Send no notices (zero)* for co-signers with an invalid or duplicated SSN.

3. Change the *Delq Level* flag to *Send no notices* (zero) for any co-signers with invalid or duplicated SSN, then use Enter to save. Remember that this can be changed to a different level later if the co-signer is updated to use a valid, non-duplicated SSN.

Tax Reporting for Foreign Citizens

The CBX tax reporting system has been set up not to report tax information for foreign citizens – records where the *Foreign Citizen* flag is checked. For any members or non-members who have been assigned an imitation SSN due to their citizenship, be sure this flag is checked accordingly.

However, do NOT check this flag for U.S. citizens under any circumstances, even if you do not have a valid SSN. When this information is reported to the IRS as part of annual tax reporting, you will be expected to adhere to appropriate backup withholding regulations for that member's dividends.

Monitoring Invalid Social Security Numbers

The most important way to keep your CBX database in good shape is to establish clear, consistent rules and procedures to be used by staff as they create member and non-member records. However, even with the most stringent adherence to these rules, there may occasionally be a situation where a duplicate or invalid SSN is entered into your files.

Therefore, it is important that a routine task for someone at your credit union be to review your key member and non-member files for duplications and make corrections as appropriate. The frequency of this depends on the size and activity level of your credit union, but the sooner these duplications are found, the easier the corrections will be and the potential consequences will be fewer.

Running the SSN Verification Reports

Use **Tool #682 *Print SSN Verification Reports*** to produce the following two reports: one showing multiple SSNs within the MASTER file that have different names, and the other showing duplicates between the MASTER and MSNONMBR files.

Report 1 – Duplicate SSNs within the MASTER file

7/21/26	9:40:36				BEDROCK COMMUNITY CREDIT UNION			LSSNNM1	PAGE
				LIST DUPLICATE SSN W/DIFF NAMES IN MASTER FILE					USER [illegible]
SSN	ACCOUNT1	NAME1			ACCOUNT2	NAME2			CO-SIGN?
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	L	YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	J	YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	T	YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		YES
000000001	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]			YES
000000002	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]		
000000007	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	H	
000000009	[illegible]	[illegible]	[illegible]	W	[illegible]	[illegible]	[illegible]		
000000009	[illegible]	[illegible]	[illegible]	W	[illegible]	[illegible]	[illegible]		
000000045	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]			
000000090	[illegible]	[illegible]	[illegible]	P	[illegible]	[illegible]			
000000101	[illegible]	[illegible]	[illegible]	M	[illegible]	[illegible]	[illegible]	L	

- Remember that in the MASTER file, the only "duplicate" situations that need to be corrected are where two records with the same SSN do not represent the same *person*. The report will include any records where the names do not match exactly. If the records truly do represent the same individual, to stop the record from appearing on the report, be sure to update both accounts so that the name is spelled the same.
- A "YES" in the "CO-SIGN?" column indicates that the SSN is listed as an additional signer on a loan account. Use Global Search to view all relationships for this SSN to determine the correct course of action.

Report 2 – Duplicate SSNs between MASTER and MSNONMBR

7/21/26 9:40:37 BEDROCK COMMUNITY CREDIT UNION LSSNNM2 PAGE

LIST SSN FOUND IN MASTER AND IN NON-MEMBER FILES USER [illegible]

SSN	MASTER	NAME ON MASTER			NON-MEMBER	NAME ON NON-MEMBER			CO-SIGN?
022334244	[illegible]	[illegible]	[illegible]	L	[illegible]	[illegible]	[illegible]	L	YES
022334244	[illegible]	[illegible]	[illegible]	A	[illegible]	[illegible]	[illegible]	L	YES
099999999	[illegible]	[illegible]	[illegible]	A	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	Q	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	A	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	M	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	Q	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	R	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	A	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	J	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	L	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	K	[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	A	
099999999	[illegible]	[illegible]	[illegible]	A	[illegible]	[illegible]	[illegible]	A	

- For this report, determine which of the records (Master or Non-Member) is the correct one, and either delete or modify the incorrect record. Contact the Client Services Team for assistance in deleting the non-member record in these situations. (You can find their contact on Page 2 of this document)

Use the instructions contained throughout this document to handle each occurrence of a duplication to keep your files clean and prevent errors.

Modifying a Social Security Number

If an imitation SSN has been assigned to a member or non-member, and you later discover the correct SSN for that person, or if a correction needs to be made, use the following steps to ensure that all related records are also updated properly throughout CBX.

> ***IMPORTANT NOTE:*** *DO NOT CHANGE A SOCIAL SECURITY NUMBER UNTIL STEPS 1-6 ARE COMPLETE.*

Remove Existing Links to the Incorrect Social Security Number

1. **Delete all pending loan requests that are listed under the incorrect SSN.** Use the *Work with Existing Loan Request* (WE) action code in **Tool #53 *Process Member Applications***, then use **Delete Loan Request** to clear the request and any associated application files. (For non-members, use **Pre-Mbrship Lending** on the entry screen to access pending loan requests.)

   > ***WARNING:*** *If the non-member record has already been deleted or the member SSN updated <u>before</u> the original additional signer record was deleted, it will not be possible to delete the additional signer record from the loan. As a workaround, if this happens, you must create a "dummy" non-member record with the old SSN, delete the additional signer record, and then delete the "dummy" non-member record.*

2. **Use Global Search to identify other relationships** the individual currently has with your credit union (additional signer, joint owner, IRA beneficiary, etc.).

3. **Delete all additional signer records** from all loan accounts and pending applications to which the incorrect or duplicated SSN is attached as an additional signer.

   - For an *existing* loan account, use **Tool #51 *Miscellaneous Loan Maintenance*** to access the Additional Signer Summary screen. Select the signer's name in the list to display the detail screen and then use **Delete** to remove the record.

   - For a *pending* loan application, access the loan application via the *Work with Existing Loan Request* (WE) action code, then select **Complete Loan Application** on the Loan Recap screen. On the first page of the loan application, click the **Change Co-Applicant/Additional Signers** button and use **Additional Signers** to display the Additional Signer Summary screen. Select the signer's name in the list to display the detail screen and then use **Delete** to remove the record.

4. **Remove all IRA beneficiary records for this SSN.** If the individual with the incorrect SSN has been named as an IRA beneficiary on any other memberships, use **Tool #897 *Update IRA Beneficiary Information*** to clear any beneficiary records with this SSN.

5. **Remove joint owner links from the other membership accounts to this SSN.** If the individual with the incorrect SSN has been named as a joint owner on any other memberships, use **Tool #15 *Update Membership Information*** to delete any joint owner records that use this SSN.

6. **Delete the individual from the household database.** Use **Tool #394 *Household Database Maintenance/Stats*** to access the household, and use **Delete** to remove the member from the household. (This will delete any household information already recorded under the

incorrect SSN; you may wish to first print screens showing key data if you wish to retain it for future use.)

Update the Social Security Number

7. **Correct the SSN in the member or non-member file.**

    - For a *member*, use **Tool #15 *Update Membership Information*** to access the membership record and change the SSN.

    - For a *non-member,* use **Tool #997 *Work with Non-Member Database*** to access the non-member record and delete it. (It is not possible to modify the SSN on a non-member record.) Then create a new non-member record with the correct SSN.

Restore Links to the Correct Social Security Number

8. **Set up new co-signer records.** Return to Additional Signer maintenance on the loan record or loan application. Add a new co-signer record using the correct SSN.

9. **Restore IRA beneficiary records for this SSN.** If this individual should be listed as an IRA beneficiary on another member account, use **Tool #897 *Update IRA Beneficiary Information*** to reestablish any beneficiary records for this SSN.

10. **Restore joint owner links to the other membership accounts.** If this individual should be listed as a joint owner on another member account, use **Tool #15 *Update Membership Information*** to restore any joint owner links to this SSN.

11. **Re-enroll into a household.** Enroll the individual into the household again using the new SSN. Use **Tool #394 *Household Database Maintenance/Stats*** to access the household, and use **Enroll/Add Members** to add the individual back into the household. Manually enter any data printed from the old record, as needed.

> ***WARNING:*** *If you do not delete and re-enroll the member using the new SSN, the record will be shown as **NOT FOUND** in the household database and there may be problems with future activity using that household record.*

Because of the complexity involved and the potential number of reasons why a duplicate SSN would exist, this process cannot be safely automated. Therefore, these steps must be completed by a person knowledgeable not only about CBX database files and how they interact with one another, but also with the member(s) and non-member(s) involved and how the records should be set up.

Establishing and following strict controls for how data is entered into CBX in the first place should significantly reduce the need for this type of maintenance in the future.

Special Situations

From time to time, there may be special situations as it relates to Social Security Numbers in CBX. The following are a few scenarios to keep in mind.

Organizational Accounts

Although organizations do not have Social Security Numbers, this account type does use the same field for a Tax ID Number (TIN), which also has nine digits. A sample TIN: 38-1234567. (On most CBX screens where member/non-member information is displayed, this field is shown as "SSN/TIN" and displays the nine digits without any punctuation.)

As with individuals, CBX requires that a valid TIN be entered when creating an organizational membership or non-member record for any purpose.

Matching SSN and TIN

Although this is rare, it is possible for a member to share the same nine-digit SSN as an organization's TIN. There is no coordination between the Social Security Administration and the issuing of tax ID numbers to organizations, so the same numbers can be allocated through both.

If your credit union happens to have both a member and a separate organization that coincidentally share the same nine-digit number, to avoid problems it is important that these accounts be marked so that they **do NOT report to the credit bureau**. In addition, if any of these records are set up as additional signers, additional signer records should be set up so that **delinquency notices are NOT generated** for these co-borrowers.

Trust Accounts

CBX Online Help contains recommendations for handling situations when a member wants to set up a membership where the primary member and the first join owner are, in essence, the same person. This happens most often for trust accounts.

To view these recommendations, access CBX Online Help (click ⓘ from any screen), enter "trust account recommendations" in the Search and select "Recommendations for Setting Up a Trust Account" from the results listing.