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On February 11, the Social Security Administration (SSA) published a Request for Comments on proposed changes to its policy for assigning new Social Security Numbers (SSNs) to children age 13 and under in the Federal Register (78 FR 9765). Comments are due on April 12th.

The SSA is considering issuing a new SSN to a child age 13 and under in three specific situations, including when:

- A third party has improperly used the child's SSN. SSA gave the examples of a third party applying for credit using the child's SSN, using the child's SSN to work, or improperly including the child's SSN on a tax return.
- The child's Social Security card was stolen in transit from SSA to the child's address, or
- The child's SSN has been improperly disclosed through the SSA's Death Master File.

This would be a departure from SSA's current policy, which applies the same standard to children as to adults. It requires evidence that a third party improperly used the individual's SSN, the number holder was not at fault, and the number holder was recently disadvantaged by the misuse. The new policy would no longer require proof that a number holder age 13 and under was disadvantaged due to misuse in any of the three situations outlined above.

The SSA is considering the new policy in recognition of factors that apply only to children:

- Children's SSNs are not likely to be in widespread use among public and private entities, such as creditors and employers, and
- Misuse of a child's SSN may go undiscovered for months or years, because children age 13 and under generally do not work, drive, or establish credit.

The SSA is seeking comments to ensure that any policy change will appropriately address the unique issues associated with the misuse of an SSN for a child age 13 and under.

[The link to file comments can be found here](#)