



Virginia Board for Asbestos, Lead, and Home Inspectors

Guidance Document: Identification Requirements for Applications for Asbestos and Lead Licensure and Home Inspector Certification

Adopted February 5, 2015

I. Applicable Law

§ 54.1-116. Applicants to include social security numbers, or other identifying number; exemption.

A. Every applicant for a license, certificate, registration or other authorization to engage in a business, trade, profession or occupation issued by the Commonwealth pursuant to this title, and every applicant for renewal thereof, shall provide on the application either his social security number or control number issued by the Department of Motor Vehicles pursuant to § 46.2-342. An initial application or renewal application which does not include either identifying number shall not be considered or acted upon by the issuing entity, and no refund of any fees paid with the application shall be granted.

II. Background

As part of the application process, Board staff conducts a data search in public and proprietary records software to verify that the applicant's name matches the Social Security Number provided on the application. This process is necessary in order to reduce the use of fraudulent Social Security Numbers in order to obtain licensure. The public and proprietary records software identifies anyone that utilizes a specific Social Security Number in any type of transaction (i.e., real estate transaction). While this system is not infallible, since multiple names have been found to be associated with the same Social Security Number, it has been the most reliable system in which Board staff

has access.

If Board staff could not verify the validity of the Social Security Number via the public and proprietary records software data search, it would request the applicant to provide verification from the Social Security Administration (SSA) of the applicant's Social Security Number. On August 1, 2014, the SSA stopped providing this service, leaving Board staff with no other source of verification in the event of a Social Security Number discrepancy. DPOR staff has explored other possibilities directly with the SSA; however, to date staff has not been successful in securing an alternative verification system with the SSA.

In December, DPOR was able to obtain access to the Department of Motor Vehicles' (DMV) Portal as an External User. However, this form of verification only works for those who have a Virginia Driver's License. Most of the fraudulent Social Security Numbers encountered come from out-of-state applicants. The public and proprietary records software is still utilized for out-of-state applicants.

III. Policy

The Board authorizes staff to request from the applicant a photocopy (front and back) of the Social Security card and a photocopy of a government-issued photo identification issued to the applicant in instances where the name cannot be matched with the Social Security Number or the Virginia Department of Motor Vehicle Control Number as supplied on the application utilizing either public and proprietary records software or the DMV Portal. Upon receipt of the requested identification, the name on the Social Security card and the government-issued photo identification must match the name on the application in order to be accepted.

Should there be any question regarding the validity of either the Social Security card or the government-issued photo identification submitted by the applicant, or if the applicant's name on these documents does not match the name on the application, the applicant may request an informal fact finding conference for the Board to further consider the application.