

Congress of the United States

Washington, DC 20515

October 6, 2026

The Honorable Frank Bisignano
Commissioner of the Social Security Administration
6401 Security Blvd.
Baltimore, MD 21235

Dear Commissioner Bisignano:

We write to you with serious concern over actions by the Social Security Administration (SSA) preventing over 1,300 foster youth in Clark County, Nevada, from receiving their Social Security numbers. Despite several attempts by our staff and local leaders to work with SSA, as well as your commitment to rectify the issue during Congressional oversight hearings, your agency has neglected to swiftly reach a solution¹.

In December 2025, SSA alerted Clark County Family Services (CCFS) that Social Security number applications for children in foster care would no longer be accepted due to SSA policy requiring applications to be accompanied with certain documents that are physically certified by the custodian of record. However, in 2010, the Eighth Judicial District Court of Nevada mandated electronic filing for civil and family cases to reduce paperwork—essentially eliminating physical certification.² Prior to this, the Nevada Supreme Court adopted statewide electronic filing rules that paved the way for local jurisdictions to operate solely on electronic documentation.³ Considering the state is the custodian of record for children in foster care and operates digitally, it is nearly impossible for CCFS to be in compliance with SSA policy.

Prior to December 2025, SSA accepted Social Security number applications for foster children in Clark County without issue. At no point in recent years did SSA notify CCFS that electronic certification of documents was against policy and needed to be addressed to avoid disruption. Additionally, SSA appears to be disregarding its own policy manual, which allows for adjudicators to accept an evidentiary standard other than preferred evidence in certain situations,⁴

¹ IRS 2026 Filing Season and IRS Operations, Hearing before the Senate Finance Committee, 119th Cong. (2026). <https://www.finance.senate.gov/hearings/the-presidents-fiscal-year-2027-irs-budget-and-the-irs-2026-filing-season>

² User. “Green Lining from Pandemic and Technology Upgrades in Court.” Eighth Judicial District Court, April 23, 2021. <https://www.clarkcountycourts.us/green-lining-from-pandemic-and-technology-upgrades-in-court/>

³ Nevada electronic filing and conversion rules. Accessed September 15, 2026. <https://www.leg.state.nv.us/courtrules/NEFCR.html>

⁴ Social Security Program Operations Manual System (POMS), effective 1/03/2024 – present, accessed September 16, 2026. GN 00301.030 Acceptability of Documentary Evidence, B.1, Claimant Submits Evidence: “The rules on probative evidence do not always require preferred evidence. If all of the following apply, the adjudicator can accept an evidentiary standard other than preferred evidence depending on: general availability of the evidence; special difficulty in obtaining the preferred evidence; importance of the fact to be proven; possibility of independent verification of the essential elements of the factual situation; and nature of the evidence offered. In some instances, allegations by the claimant are sufficient.”

allows for electronically signed court documents in lieu of those with a raised seal,⁵ and calls for third-level evidence to be handled on a case-by-case basis.⁶

There is additional concern that SSA is not recognizing the structure of Nevada's immunization information system, WebIZ, when considering valid forms of secondary documentation for children under the age of 6 to receive a Social Security number. Nevada WebIZ serves as the digital, statewide immunization information system (IIS) as required by state law. This information can be accessed by authorized users, including CCFS. Clark County was advised earlier this year that a certified physical copy of immunization records should be obtained from the child's medical provider. This is extraordinarily labor intensive and difficult to obtain in a timely manner. Additionally, CCFS has provided digital immunization records from WebIZ as secondary documentation in the past. Immunization records provided by the WebIZ System are official certificates of immunization and that language is reflected in the document itself. There is no custodian of record for the immunization records and a stamp or seal cannot be affixed to the record, as these records are declared instead to be official under Nevada law.

Since the initial notice from SSA in December 2025, CCFS has provided documentation from the State of Nevada to SSA consistent with the state's mandated electronic records and has offered to obtain any necessary information from the state to authenticate these records that may be used in other states. To date, there has been no response from the agency to this request. While we understand that CCFS must comply with SSA policy, it is extremely reckless to enforce unknown standards without providing CCFS time to coordinate with SSA, account for the statewide barriers making it difficult to immediately produce certified physical documentation, and prevent vulnerable children from being impacted. It is also disingenuous to disregard Nevada's usage of electronic processes when you champion SSA's "Digital First Initiative" that has moved many services to electronic processes.⁷

Because of SSA's actions and the resulting delays in issuing Social Security numbers, foster children in Clark County are being blocked from adequate health care, including mental health services, because Social Security numbers are required to enroll in Medicaid and

⁵ POMS, effective 1/03/2024 – present, accessed September 16, 2026. GN 00301.030 Acceptability of Documentary Evidence, B.3, Claimant Submits Evidence: Court orders and decrees: "Court orders or decrees kept in the custody of the claimant must contain **one or more of the following**: raised stamp or affixed seal of the court; statement on the order or decree that it was filed with the court and signed by the clerk of the court (we will accept a facsimile signature from the clerk of the court; however, a typed name is not sufficient if that is the only means used to certify the order or decree); or judge's signature on the order or decree (we will accept a facsimile signature from the judge; however, a typed name is not sufficient if that is the only means used to certify the order or decree). ***Computer-generated signatures and "electronically signed" documents from the custodian of record are acceptable***" (emphasis added).

⁶ POMS, effective 07/31/2026 – present, accessed September 17, 2026. RM 10210.420 Priority List of Acceptable Evidence of Identity Documents, A, Documents for children from birth through age 5:

"3. Third-level evidence is handled on a case-by-case basis. When the applicant for the child: presents a primary or secondary document not listed in the Proof of Identity drop down in the Enumeration System or in [RM 10210.420A.1](#), or [RM 10210.420A.2](#), in this section, or states that a primary or secondary identity document is not available (available means the document exists and the applicant can access or obtain it within 10 business days)."

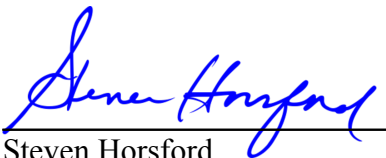
⁷ Walsh, Bill. "Social Security Chief: Agency Working to 'Serve the Client Faster.'" Social Security Chief: Agency Working to 'Serve the Client Faster,' February 26, 2026. <https://www.aarp.org/social-security/commissioner-frank-bisignano-interview/>

Children's Health Insurance Program (CHIP) coverage. Foster children are also being blocked from stable, loving homes because family reunification and new home placements are pending until Social Security cards can be obtained. Foster children are even blocked from independent, successful futures because Social Security cards are required to obtain a driver's license and secure employment. If SSA refuses to take action, these impacts will worsen and harm hundreds more innocent foster youth than they already have.

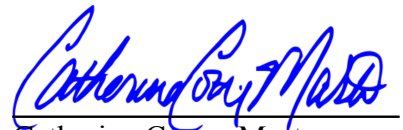
We demand that SSA take immediate action by processing the pending applications of foster children that have not been able to obtain Social Security numbers because of the agency's sudden enforcement of certified physical documentation over electronic documentation. We additionally request that SSA rectify document certification discrepancies with CCFS by the end of 2026 to ensure foster children in Nevada do not face this issue again. To maintain alignment and transparency, please submit a written response within 10 business days, as well as regular backlog updates. Foster youth already face numerous challenges in life; it is unacceptable for the government that is responsible for them to be an additional source of struggle.

Thank you for your attention to this matter. We look forward to your timely response.

Sincerely,



Steven Horsford
Member of Congress
Nevada's Fourth
Congressional District



Catherine Cortez Masto
United States Senator