

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



August 24, 1981

ALL-COUNTY INFORMATION NOTICE I-101-81

TO: ALL COUNTY WELFARE DIRECTORS

ATTENTION: AFDC QUALITY CONTROL STAFF

SUBJECT: REVISED QUALITY CONTROL REVIEW PROCEDURES FOR SSN REQUIREMENTS

REFERENCE:

New Social Security Number (SSN) review procedures have been developed as a result of recent regulation changes, and these supersede previous instructions issued in All-County Letter No 80-78 (12/12/80). Because ACL 80-78 also contained some Quality Control (QC) review procedures not relevant to SSN requirements, only those instructions related to the SSN requirements are affected. Regulation changes effective 4/1/81 now require the applicant/recipient to submit verification of application for/or attempted application for a SSN before aid can be authorized.

I. New applications or redeterminations with effective dates from 1/1/80 through 3/31/81.

During the QC review of the case record, the reviewer should look for the following documentation:

- A. A SSN for each member of the FBU, or;
- B. For those FBU members without a SSN in the case record, there must be one of the following:
 1. A receipt for application for a SSN (form SSA-5028), or
 2. The recipient's written statement indicating an application for a SSN had been made, or
 3. The recipient's written statement of attempted application for a SSN when an application has been refused by the SSA. (SSA may not accept an application in the absence of certain documents, e.g., birth certificate, marriage certificate, etc.).

When the case record contains a SSN for each member of the FBU, the reviewer should verify the SSN at the home visit. If at least one or none of the documents outlined in B. 1-3 above is in the case record, the following review procedures should be followed:

For new cases with an application date of 1/1/80 and ongoing cases with a redetermination date of 1/1/80 or later, all of the above applies, and all pertinent documentation must be in the case record. However, cases which have not had a redetermination since 1/1/80, even if the redetermination is overdue, should be reviewed in accordance with regulations and procedures which were in effect prior to 1/1/80, i.e., an error exists only when there is an indication of the recipient's refusal to cooperate, and aid continues to be paid for the individual lacking a SSN or a receipt for application of a SSN.

Per EAS Section 40-107.71, counties are required to review every 90 days all cases in which a SSN has not been provided for each FBU member. This review by the counties is to ensure that the recipient furnishes the SSN when it is received, to inquire about the status of the SSN application, or to ensure that the recipient is still cooperating in applying for a SSN. There is no requirement for the counties to document this review in the case record, and QC should not cite errors solely on the basis of the counties' failure to document the case every 90 days for SSN requirements.

For the purpose of determining if a QC error exists, the 90-day review requirement will be considered when reviewing for compliance with the SSN requirements. To ensure that the 90-day time frame is applied consistently in all cases, the following starting dates will be adhered to:

1. new applications - the date of the CA-1/CA-8;
2. redetermination - the date the CA-2/CA-20 is signed by the recipient;
3. newborns - the first day of the second month after the month the mother is released from the hospital.

EXAMPLE:

Child is born 1/15/81, and the mother and child are released from the hospital on 1/18/81. The starting date for the 90-day review period is 3/1/81.

Also, as long as recipients can show that they are trying to comply with the SSN requirements, the county may grant 90-day extensions. When the QC review month falls within one of these 90-day extensions, there will not be a QC error even if the recipient has not met the SSN requirements. Each FBU member without a SSN is ineligible only when all of the following conditions exist:

1. the review month is after the lapse of the 90-day time frame, and
2. the lapse occurred in or before the second month prior to the review month, and
3. the county has not contacted the recipient, and
4. the recipient has not yet applied for a SSN.

EXAMPLE #1:

Review Month = 5/81; Application Date (CA-1) = 3/10/81
 Aid Authorized = 3/28/81; Effective Date = 3/10/81

At the time of application, the recipient's only child did not have a SSN. As of the review date (5/1/81), the recipient had not yet applied for a SSN for the child. In this situation, no QC error exists as the review date fell within the 90-day period.

EXAMPLE #2:

Review Month = 7/81; Redetermination Date (CA-20) = 2/8/81

During the annual redetermination, the recipient was instructed to apply for a SSN for her youngest child. As of the review date (7/1/81), the recipient had not yet applied for the SSN, and the county did not contact her at the end of 90 days (5/6/81). In this case, the youngest child is ineligible.

II. New application or redeterminations with an effective date of 4/1/81 or later.

For new cases, one of the documents outlined in I. B. 1-3 above must be in the case record, and the document must be dated on or prior to the authorization date for the beginning aid payment. If the county authorized aid without one of the required documents being submitted by the applicant, the FBU member without the required verification is ineligible.

In ongoing cases with a redetermination date of 4/1/81 or later, the above requirements must be met in order for aid to be continued. If the county continues aid without obtaining the verification outlined in I. B. 1-3 above, the FBU member without the required verification is ineligible.

The 90-day review requirement is not applicable in the above situations. However, it is to be used in those cases where there is documentation that the recipient has applied for or attempted to apply for a SSN. For these cases, the review procedures outlined in Section III of this memo are to be followed.

EXAMPLE #1: New Applications

Review Month = 7/81; Application Date (CA-1) = 4/15/81

At the time of application, the applicant's only child did not have a SSN. Aid was authorized on 5/12/81, with an effective date of 5/1/81. As of the review date (7/1/81), the case record did not contain any documentation to verify the recipient had applied for, or attempted to apply for, a SSN for the child. At the home visit, the recipient produced a receipt for application for a SSN (SSA-5028), dated 4/30/81. In this situation, ineligibility would exist for both members of the FBU. The recipient did not submit, nor did the county request, verification of application for a SSN prior to the authorization of aid.

EXAMPLE #2: Redeterminations

Review Month = 8/81; Redetermination (CA-20) = 5/8/81

During the annual redetermination, the recipient was instructed to apply for a SSN for her youngest child. Aid was continued without verification that the recipient had applied for, or attempted to apply for, a SSN for the child. As of the review date, the recipient still had not applied for the SSN. In this situation, the youngest child is ineligible because the county did not have the required verification and continued to pay aid without it.

III. Case record contains an application for a SSN or the recipient's signed statement of application for or attempted application for a SSN.

Regardless of the beginning authorization date or redetermination date, the following procedures are to be used when the case record contains a receipt for application of a SSN, or the recipient's signed statement that application for a SSN has been made. The recipient is to be questioned at the home visit relative to the receipt of the actual number. Here again, the 90-day review period is to be used in determining if a QC error exists. Ineligibility will exist for the individual with the unreported SSN only if all of the following conditions exist:

1. the SSN has been received but not reported, and
2. the date of receipt was in or before the second month prior to the review month, and
3. it has been 90 days since the date of application, redetermination, or the last contact by the county, and the county has not recontacted the recipient to obtain the SSN.

The recipient's sworn written statement will be accepted as to the date of the receipt of the SSN. The statement should be completed and signed by the recipient.

EXAMPLE #1:

Review Month = 4/81; Application Date (CA-1) = 1/12/81

During the home visit, the recipient stated she received the SSN in 2/81 (second month prior to the review month) but had not yet reported it to the county. No QC error exists as it has not been 90 days since the date of application.

EXAMPLE #2:

Review Month = 4/81; Application Date (CA-1) = 12/12/80

In this case, the client states she received the SSN in 2/81, and has not yet reported it to the county. Also, the county did not contact the recipient at the end of 90 days to see if the SSN had been received. There is ineligibility for the QC review month for the person for whom the SSN was intended.

NOTE: The fact the 90-day review period expired in the month prior to the review month does not affect the error. The change in circumstances occurred when the SSN was received (2/81) and not reported. Had the county contacted the recipient at the end of the 90-day period, they would have obtained the SSN, and no error would have existed as of the review date.

IV. Newborns

The review of SSN requirements for newborns differs from the previously outlined review requirements. EAS Section 40-105.26 now specifies that mothers of newborn children have until the end of the month following the month they are released from the hospital to apply for a SSN for the newborn child. The 90-day review period is not applicable to the application for a newborn. It is applicable, however, starting the first day of the second month following the month the mother is released from the hospital to ensure that the SSN is reported when received.

EXAMPLE #1:

Review Month = 10/80; Newborn Birthdate - 8/8/80; Mother's Release Date = 8/11/80
In this situation, the case record does not contain a receipt for application for a SSN or any other documentation that the recipient attempted to apply for a SSN for the newborn. During the home visit, the recipient stated that she had not yet applied for a SSN for the newborn. The newborn is ineligible for the review month, even though the deadline to apply for the SSN fell on the last day of the administrative (PAL) period.

EXAMPLE #2:

Review Month = 1/81; Newborn Birthdate = 10/15/80; Mother's Release Date = 10/18/80
The case record contains a receipt for application for a SSN dated 12/5/80. During the home visit, the recipient states that she received the SSN about 1/12/81, but she has not yet reported it to the county. There is only a procedural error in this case. As of the review date (1/1/81), the case record did contain a receipt for application of a SSN, even though the recipient did not apply for it within the required time frame. Also, the unreported SSN has no effect, as the SSN was received after the review date.

If you have any questions regarding these review procedures, please contact the District QC Office responsible for your county.

Sincerely,



R. E. REICH
Deputy Director
Planning and Review Division

cc: CWDA