

**DEPARTMENT OF SOCIAL SERVICES**

744 P Street, Sacramento, California 95814



January 12, 2001

ALL COUNTY LETTER NO.03-01

TO: ALL COUNTY WELFARE DIRECTORS  
ALL CalWORKs PROGRAM SPECIALISTS

**REASON FOR THIS TRANSMITTAL**

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

SUBJECT: RETAINING RECORDS FOR PURPOSES OF TRACKING TIME ON AID FOR THE CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS (CalWORKs) AND TEMPORARY ASSISTANCE TO NEEDY FAMILIES (TANF) PROGRAMS

REFERENCE: ALL COUNTY LETTERS (ACLs) 97-65, 97-68, 98-37, 99-90, AND 00-48  
ALL COUNTY INFORMATION NOTICE (ACIN) I-52-99

This letter is to instruct counties to retain welfare case records (as described below) that support the tracking of time on aid for CalWORKs recipients. As counties may not have the required time limit information in their data systems and some county systems are not yet programmed to retain and transfer their information to the statewide automated system, we are requesting that this information be retained in another secure form. Even though you may have time limit records in your consortia or county automated systems, you must also retain these records in hard copy or permanent photographic or electronic form as well, until all pertinent data has been transmitted to the statewide automated time limit tracking (Welfare Data Tracking Implementation Project [WDTIP]) system and validated for completeness and accuracy.

Counties have expressed concern regarding the cost of continuing to retain all case records. Counties can request funding for these costs through the Proposed County Administrative Budget (PCAB) process and should refer to the technical notes provided in the PCAB training. Further, it is the intent of the California Department of Social Services (CDSS) that counties maintain case records no longer than necessary to validate data on the statewide WDTIP system.

**TIME LIMIT REQUIREMENTS**

Federal and state law and regulations require 18- or 24- and 60-month time limits on the receipt of aid and provide for exceptions to time limit requirements. (Please refer to ACL 99-90 for a comprehensive description of the various CalWORKs and TANF program

requirements on 60-month time limit tracking and for charts that detail program requirements and their affect on 18- or 24- and 60-month “clocks.”) As discussed in ACL 99-90, time limit regulations impose the necessity for tracking time on aid for CalWORKs recipients’ TANF and CalWORKs 60-month time clocks.

## **VALIDATION PROCESS FOR WDTIP**

The statewide automated WDTIP system is under implementation to track time on aid. This system has been developed for use by county welfare departments to make eligibility and welfare-to-work participation determinations for welfare recipients based on the aggregate time on aid. Counties are expected to provide complete time limit information to the WDTIP system for all applicable individuals, in order to have an automated system to calculate time clocks accurately. We acknowledge that counties will need sufficient time to provide the data to WDTIP. However, the length of time a county must continue to maintain their records will depend upon on how expeditiously they are able to provide and validate the necessary time limit tracking records for all recipients on aid since the federal and state time limits applied in December 1996 and January 1998, respectively. It is anticipated that the system will be fully implemented in mid-2001, when all counties have completed conversion to the system.

Following full implementation, there will be a need to monitor the system for a sufficient period of time to ensure that it contains complete and accurate time limit information so it can be considered a reliable system. In order to ensure that WDTIP contains complete and accurate time limit information, counties may be required to review case records to validate the information. If a county/consortia automated system accurately reflects all the necessary time limit information and this information has been sent to the WDTIP system, a review of case records will not be required. The validation of time clocks will be an ongoing process that counties will need to employ in order to resolve any discrepancies that may arise over the accuracy of the time clocks. Until the WDTIP system has been tested over time and proven reliable, counties may need to rely on their case records.

Without case records, counties will be unable to verify the accuracy of recipients’ time limit tracking information. Inaccurate time clocks may lead to undue hardship to CalWORKs recipients whose eligibility and program participation could be negatively affected and consequently result in an increase in state hearings and litigation. Therefore, it is imperative that counties maintain the necessary case records until the WDTIP system records are validated.

## **RECORDS TO BE RETAINED**

Time limit tracking records for the federal TANF time limit must be retained from the date that the TANF program was implemented. For the federal TANF time limit, records related to receipt of aid in California must be retained from December 1, 1996. For the state CalWORKs time limits, the records must be retained from January 1, 1998.

Specifically, counties are required to:

- Maintain records of the computed monthly grant amounts (including special needs payments) and diversion payment amounts for each adult or minor head of household.
- Retain case narrative portions and appropriate forms in order to support exceptions to the time limits, including exemptions and other program requirements that affect the time limits such as sanctions and domestic violence good cause waivers.
- Retain documentation that verifies the months in which TANF aid was received in other states or territories. (TANF assistance may have been provided as early as August 1996.)

In addition to the above mentioned, any other case records containing information that can be used for time limit tracking must also be retained. Counties should incorporate new timeframes for records retention to include case records that support time limit tracking. Any counties that may have begun to purge time limit tracking records must cease to do so until further direction from the CDSS.

If you have any questions regarding this letter or need additional information, please contact Charissa S. Miguelino at (916) 657-3665.

Sincerely,  
***Original signed by***  
***Bruce Wagstaff***  
***on 1/12/01***  
BRUCE WAGSTAFF  
Deputy Director  
Welfare to Work Division

c: CWDA  
CSAC