



CDSS

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EDMUND G. BROWN JR.
GOVERNOR

June 22, 2018

ALL COUNTY LETTER (ACL) NO. 18-72

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CHILD CARE COORDINATORS
ALL WELFARE TO WORK COORDINATORS
ALL CONSORTIA REPRESENTATIVES

SUBJECT: CALIFORNIA WORK OPPORTUNITY AND RESPONSIBILITY TO KIDS
(CaWORKs) CHILD CARE PROGRAMS – REMOVAL OF THE SOCIAL
SECURITY NUMBER REQUIREMENT FOR CHILD CARE PROVIDERS

REFERENCE: [MANUAL OF POLICIES AND PROCEDURES \(MPP\) SECTIONS 47-260.3;
47-260.5; CALIFORNIA DEPARTMENT OF EDUCATION MANAGEMENT
BULLETIN 17-20; 42 UNITED STATES CODE \(USC\) SECTION
9858i\(a\)\(1\)\(E\); 45 CODE OF FEDERAL REGULATIONS \(CFR\) SECTION
98.71\(a\)\(14\); CALIFORNIA CIVIL CODE SECTION 1798.14](#)

This letter is to inform county welfare departments that the collection of a license-exempt child care provider's Social Security number (SSN) is no longer required. The MPP section 47-260.5 governing license-exempt provider information has been updated and renumbered to reflect this change by deleting the SSN requirement.

The SSN of the head of the assistance unit is also no longer required on forms utilized by the Administration for Children & Families Office of Child Care (ACF OCC).

BACKGROUND

The previous regulation requiring counties to collect SSNs from license-exempt child care providers complied with federal law requiring states to report their SSNs, and it also avoided a duplicated count of providers in a report or audit. Pursuant to changes in federal reporting requirements, states receiving program funding from the Child Care and Development Block Grant are prohibited from submitting reports to the Secretary containing personally identifiable information including SSNs, which have been replaced with Unique Identifying numbers for the head of the assistance unit and the child care provider. [42 USC section 9585i\(a\)\(1\)\(E\)](#); [45 CFR section 98.71\(a\)\(14\)](#).

The AFC OCC requires that all states submit their federal reporting requirements via the ACF-801 Child Care Monthly Case Record Form. Since this information is no longer federally

required, the ACF OCC has mandated that effective October 2015 SSNs may no longer be reported on the ACF-801 case-level report.

CALIFORNIA STATE LAW

California civil code expressly prohibits state agencies' collection or use of personal information such as SSNs. Pursuant to [California Civil Code section 1798.14](#), state agencies are expressly prohibited from the collection or use of personal information such as SSNs unless specifically necessary to accomplish a required function mandated by federal law.

In an effort to comply with federal and state law, the [California Department of Education released Management Bulletin 17-20](#) modifying child care application requirements. The Bulletin instructed that, since SSNs cannot be federally reported, there is no longer a need for agency contractors to collect them. As such, the SSN field was deleted from the Confidential Application for Child Development Services and Certification of Eligibility (EESD-9600) child care services form.

AUTOMATION AND REPORTING REQUIREMENTS

This policy change should be automated into the consortia systems by the effective date of the new law or a process must be put in place to meet the requirements of the policy change until necessary automation changes are completed. Reporting requirements are unchanged for Temporary Assistance for Needy Families-funded child care as part of the Stage One single allocation.

CHILD CARE AS A NECESSARY SUPPORTIVE SERVICE AND PARENTAL CHOICE

As a reminder, current and former CalWORKs families are offered child care as a necessary supportive service in order to support families working towards self-sufficiency.

Parents have a variety of choices in selecting a child care provider. Licensed child care and child care exempt from licensure are valid parental choices of care for all clients of the Stage One Child Care program, and payment shall be made for these child care providers. ([MPP section 47-260.3](#))

If you have any questions regarding this letter, please contact the Child Care Programs Bureau at (916) 657-2144.

Sincerely,

Original Document Signed By:

TODD BLAND
Deputy Director
Welfare to Work Division