

January 31, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-17

The purpose of this All County Letter (ACL) is to provide guidance to statewide systems on the amended requirements set forth by [Assembly Bill \(AB\) 499 \(Chapter 155, Statutes of 2020\)](#). AB 499 amends [Section 11019.7 of the Government Code](#), mandating state agencies to truncate social security numbers to the last four digits on any outgoing United States mail on or before January 1, 2023.



KIM JOHNSON
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

January 31, 2023

ALL COUNTY LETTER NO. 23-17

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY WELFARE ADMINISTRATIVE OFFICERS
ALL CONSORTIA REPRESENTATIVES
ALL COUNTY REFUGEE COORDINATORS

SUBJECT: IMPLEMENTATION OF ASSEMBLY BILL (AB) 499:
REQUIREMENTS FOR OUTGOING UNITED STATES MAIL
CONTAINING INDIVIDUALS' SOCIAL SECURITY NUMBERS

REFERENCE: [PRIVACY ACT OF 1974; 45 CFR 205.50; ASSEMBLY BILL 499 \(CHAPTER 155, STATUTES OF 2020\); GOVERNMENT CODE SECTIONS 6250 ET SEQ., 10850, 11015.5, 11019.7, 27301; CALIFORNIA INFORMATION PRACTICES ACT OF 1977; HEALTH AND SAFETY CODE SECTION 1500 ET SEQ.; INFORMATION PRACTICES ACT, CIVIL CODE SECTION 1798 ET SEQ.; STATEWIDE ADMINISTRATIVE MANUAL 5310 ET SEQ.; STATEWIDE INFORMATION MANAGEMENT MANUAL – 5310 A & 5310 B; ALL COUNTY LETTER \(ACL\) NO. 19-56, ACL NO. 19-56E; DEPARTMENT OF HEALTH CARE SERVICES LETTER NO. 22-10](#)

The purpose of this All County Letter (ACL) is to provide guidance to County Welfare Departments (CWDs) and specified automation systems organizations on the amended requirements set forth by [Assembly Bill \(AB\) 499 \(Chapter 155, Statutes of 2020\)](#). AB 499 amends [Section 11019.7 of the Government Code](#), mandating state agencies, and therefore all CWDs operating federal and state programs on behalf of the CDSS, truncate social security numbers (SSNs) to the last four digits on any outgoing United States mail on or before January 1, 2023. The Department of Health Care Services (DHCS) released [All County Welfare Directors Letter No. 22-10](#) to provide guidance as it relates to AB 499 and DHCS programs.

BACKGROUND

Existing law, Government Code Section 11019.7, prohibits a state agency from sending any outgoing United States mail to an individual that contains personal information including, but not limited to, the individual's SSN, telephone number, driver's license number, or credit card account number unless that personal information is contained within sealed correspondence and cannot be viewed from the outside of that sealed correspondence.

As defined by Government Code Section 11019.7, "outgoing United States mail" includes correspondence sent via a common carrier, including, but not limited to, a package express service and courier service. A list of automation systems to which this new requirement applies is on page three of this letter.

[AB 499](#) amends Section 11019.7 by prohibiting a state agency from sending any outgoing United States mail containing an individual's SSN unless the number is truncated to its last four digits, or as permitted under other specified circumstances. The new requirements of Government Code Section 11019.7 are hereinafter discussed in detail.

The following federal, state, and county references provide additional information related to privacy and personally identifiable information (PII) rights:

- [Federal Privacy Act of 1974](#)
- [California Information Practices Act of 1977](#)
- [Government Code Section 11015.5](#)
- [Health and Safety Code section 1500 et seq.](#)
- [Information Practices Act - Civil Code section 1798 et seq.](#)
- [Public Records Act - Government Code section 6250 et seq.](#)
- [Safeguarding Information for the Financial Assistance Programs - 45 CFR section 205.50](#)
- [Welfare and Institutions Code section 10850](#)
- [Statewide Administrative Manual \(SAM\) section Privacy 5310 et seq.](#)
- [Statewide Information Management Manual \(SIMM\) 5310 - A](#)
- [Statewide Information Management Manual \(SIMM\) 5310 - B](#)
- [Government Code 27301](#)

NEW REQUIREMENTS

Beginning January 1, 2023, [Government Code Section 11019.7](#) prohibits state agencies from sending any outgoing United States mail that contains an individual's SSN unless the number is truncated to its last four digits, except in the following circumstances:

- Federal law requires the inclusion of the SSN;
- The documents are mailed to a current or prospective state agency employee;
- An individual erroneously mailed a document containing an SSN to a state agency, and the state agency is returning the original document by certified or registered United States mail;
- The Controller is returning documents to an individual previously submitted by the individual under [Chapter 7 \(commencing with Section 1500\) of Title 10 of Part 3](#) of the Code of Civil Procedure; or
- The document is sent in response to a valid request for access to personal information under [Section 1798.34 of the Civil Code](#).

As a reminder, [ACL No. 19-56](#) and [ACL 19-56E](#) issued critical information related to County Department/Agency security and privacy of Personally Identifiable Information (PII) contained in various systems, including SSNs.

Specified systems are expected to make changes to implement the requirements of [AB 499](#). County specific processes within State systems that currently include mailing of SSNs must be revised to comply with AB 499. These systems include, but are not limited to:

- Statewide Automated Welfare System (SAWS) and BenefitsCal;
- Case Management, Information, and Payrolling System (CMIPS);
- State Hearings Division Appeals Case Management System (ACMS);
- Electronic Benefits Transfer (EBT);
- Child Welfare Services/Case Management System (CWS/CMS);
- Child Welfare Services – California Automated Response and Engagement System (CWS – CARES); and
- County Expense Claim Reporting Information System (CECRIS)

If the system is unable to implement necessary system changes within a reasonable timeframe, the system must implement a workaround to redact or truncate all SSNs in any outgoing mail to applicants or recipients. It is recommended that CWDs continue to encourage program applicants to submit **copies** (not originals) of required documentation only.

Please note: Except for some minor changes identified as needed for SAWS and CMIPS, an initial CDSS analysis determined that there are likely no impacts to any other relevant systems as they have already developed and implemented modifications to truncate or eliminate use of SSNs prior to [AB 499](#). The SAWS will require very minor changes in the automation of some rare situations when an SSN is mailed in an incomplete online application that is printed and mailed to recipients for completion. The CMIPS changes were effective January 27, 2023.

All CWDs should report any mailings that violate [AB 499](#) to CDSS using the breach and incident process outlined in the CDSS Privacy and Security Agreement, issued in [All County Letter \(ACL\) No. 19-56](#) and [ACL No. 19-56E](#) or in any superseding ACLs.

If you have any questions or need additional guidance regarding the information in this letter, contact the Information Security and Privacy Office at (916) 651-5558.

Sincerely,

Original Document Signed By

SALENA CHOW
Chief Operating Officer
California Department of Social Services