

June 07, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-53

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with training opportunities, best practices, and clarifying guidance regarding the use of The Work Number® (TWN) in determining initial and ongoing eligibility for the CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) programs. This letter also provides clarifying guidance regarding use of TWN for program integrity purposes, when verifying information during Special Investigation Unit (SIU) fraud investigations.



KIM JOHNSON
DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

June 07, 2023

ALL COUNTY LETTER NO. 23-53

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CALFRESH SPECIALISTS
ALL CALWORKS PROGRAM SPECIALISTS
ALL WELFARE-TO-WORK COORDINATORS
ALL TRIBAL TANF ADMINISTRATORS
ALL CHILD CARE COORDINATORS
ALL COUNTY INCOME ELIGIBILITY AND VERIFICATION
SYSTEM COORDINATORS
ALL COUNTY SIU COORDINATORS
ALL COUNTY SIU CHIEFS

SUBJECT: CLARIFYING GUIDANCE ON THE WORK NUMBER® USAGE

REFERENCE: [WELFARE AND INSTITUTIONS CODE \(WIC\) SECTION 11023](#); [WIC SECTION 18901](#); [ALL COUNTY LETTER \(ACL\) NO. 20-135](#); [ACL NO. 19-08](#); [ACL NO. 21-16](#); [ACL NO. 18-20](#); [ACL NO. 19-08](#); [ACL NO. 16-118](#); [ACL NO. 20-48](#); [ACL NO. 20-135](#); [ACL NO. 22-20](#); [ACL NO. 17-57](#); [ACL NO. 21-25](#); [ALL COUNTY INFORMATIONAL NOTICE \(ACIN\) NO. I-45-11](#); [ACIN NO. I-45-11E](#); [TITLE 7 OF THE CODE OF FEDERAL REGULATIONS \(CFR\) 273.2\(c\)\(5\)](#); [MPP SECTION 20-006.543](#); [U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE \(FNS\) MEMO DATED AUGUST 21, 2019](#); [INFORMATION FROM THIRD PARTY PAYROLL SOURCES](#); [FNS HANDBOOK 310 SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM QUALITY CONTROL REVIEW HANDBOOK](#); [SAWS 2 PLUS](#); [SAR 7](#); [CF 285](#); [CF 37](#); [CW 2200](#); [GEN 1390](#)

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with training opportunities, best practices, and clarifying guidance regarding the use of The Work Number® (TWN) in determining initial and ongoing eligibility for the CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) programs. This letter also provides clarifying guidance regarding use of TWN, for

program integrity purposes, when verifying information during Special Investigation Unit (SIU) fraud investigations.

BACKGROUND

In December 2020 the CalFresh program released [ACL No. 20-135](#) to provide CWDs with guidance on the implementation of [Assembly Bill \(AB\) 79 Sections 84](#) and [85](#) (Chapter 11, Statutes of 2020), which amended [Welfare Institutions Code Sections 18901](#) and [WIC Section 18901.1](#), respectively. The guidance requires CWDs, to the extent permitted by federal law, regulation, guidance, or a waiver thereof, to first seek verification from available electronic sources or self-attestation before requesting documentary evidence from the applicant or beneficiary to complete required verification or pursuing secondary evidence to verify the necessary information.

Additionally, [ACL No. 20-135](#) identified TWN as an available electronic source. TWN is a consumer credit report service provided by Equifax Workforce Solutions LLC used by CWDs to secure verification of income and hours worked when necessary to determine initial and ongoing eligibility and program integrity for the CalFresh and CalWORKs programs. The California Department of Social Services (CDSS) currently has a three (3) year contract with Equifax Workforce Solutions LLC to provide CWDs access to TWN online web portal. The term of the contract is from April 1, 2022, to March 31, 2025, with an allotted usage for each contract year. In order to prevent overages of allotted usage and possible disruption of TWN services, the CDSS is providing clarifying guidance and best practices to help limit unnecessary and/or improper use of TWN.

Nothing in this letter will be construed to prohibit CWDs from utilizing TWN for the Recipient Income Eligibility Verification System (R-IEVS), the Special Investigation Unit (SIU), or fraud investigation activities as described in [ACL No. 19-08](#) and [ACL No. 21-16](#).

BEST PRACTICES

Each time TWN report is accessed, the transaction is debited from the allotted usages CDSS has available for the contract year. For this reason, the CDSS requires the CWDs to save all TWN reports to the applicant/recipient's case file. The CWDs are instructed to save a copy of TWN reports within the county's consortia system or print a paper report to add to the client's physical file. The CWDs must also document the findings of the report in the case notes within the Statewide Automated Welfare System (SAWS).

Prior to requesting TWN report, the CWDs are required to check the case file for an existing report. The CWD is authorized to utilize TWN for necessary information to determine eligibility only if the report was not previously saved to the case file.

THE WORK NUMBER TRAINING OPPORTUNITIES

Beginning in 2023, the CDSS will begin facilitating bi-annual training, provided by Equifax Workforce Solutions LLC, on access, functionality, and best practices for use of TWN service. The CDSS strongly suggests CWD staff with new access to TWN attend one (1) training within six (6) months of accessing TWN. The CDSS also encourages CWD staff with existing access to attend one (1) bi-annual refresher training. If the CWD would like to schedule a training beyond the CDSS facilitated bi-annual trainings, please contact the CDSS at DataAccessUnit@dss.ca.gov.

Additionally, if the CWD would like to grant new user access, revoke user access, or update web managers, please contact govt.veri.accessreq@equifax.com.

CALFRESH INITIAL ELIGIBILITY, SEMI-ANNUAL REPORT (SAR), AND RECERTIFICATION

Third-party payroll sources, such as TWN, can be used to verify information provided by a household. If a household provides information about its income and employment in writing or verbally at initial application, recertification, periodic report, or voluntary report, the CWD can use TWN to verify the household's reported income and employment information. If the household does not provide information about income and employment, the CWD must not use TWN to determine whether the household has income. When the information provided by the household matches the information provided by TWN, the CWD must treat the information as verified and apply it to the case per program rules. When the information provided by the household does not match the information provided by TWN, further clarification and verification is needed before a change may be made to the case.

The CWDs may request additional clarification and verification during interviews by contacting the household via phone and case documenting that information or sending the household the [CW 2200](#). The CWDs are reminded that when verifying information, CWDs cannot require a specific type of verification, even if the information is considered mandatory verification. Verification can be secured using methods such as, but not limited to, documentary evidence, electronic verification, collateral contacts, and client statement. The CWDs must use the best available information when certain verification methods are unavailable to the household. For more information on CalFresh verification requirements, please reference [ACL No. 20-48](#), [ACL No. 20-135](#), [All County Informational Notice \(ACIN\) No. I-45-11](#) and [ACIN No. I-45-11E](#).

As a reminder, if the information provided by TWN is not discrepant with the information provided by the CalFresh applicant or recipient on the application, periodic report, recertification, or mid-period report, verbal consultation is not necessary. The

requirement to consult with the applicant or recipient is considered fulfilled. However, if the household is a recipient of CalWORKs Public Assistance CalFresh (i.e. they are also recipients of CalWORKs), then CWDs must determine and verify the income for both programs in accordance with the CalWORKs income verification process outlined in this letter. For all other Public Assistance CalFresh households (i.e. CalFresh recipients also receiving public assistance through programs other than CalWORKs), CWDs must follow the CalFresh income verification process. For more information about Public Assistance CalFresh households, refer to [ACL No. 21-25](#).

TWN report used to determine eligibility provides information beyond what was reported on the application for benefits in an IEVS match showing the client potentially missed a mandatory report (i.e. income over IRT), the CWD must attempt to verify the discrepancy by sending a client verification letter in accordance with [Manual of Policies and Procedures \(MPP\) Section 20-006.543](#). If the client fails or refuses to respond with sufficient information to clear the discrepancy, the CWD must consider the income reported by the appropriate third-party payroll source TWN as verified and determine its effect on eligibility in accordance with program rules. The CWD must assess any overissuances (OIs) and/or overpayments (OPs) in accordance with program rules for the months the client failed to report income over their IRT. If the third-party payroll source information shows current income, the CWD must apply program rules to determine if the income affects current benefit levels.

For more information on the use of TWN for CalFresh, refer to [ACL No. 19-08](#) released on February 9, 2019.

CALWORKS INITIAL ELIGIBILITY, MID-PERIOD REPORTS, AND REDETERMINATION

Pursuant to the [MPP Section 44-103.21](#), the applicant/recipient is responsible for providing information necessary to determine eligibility. Additionally, per [MPP Section 40-157.213](#), the CWD has a responsibility to assist in obtaining the required information if the applicant/recipient is unable to provide the necessary information to determine eligibility.

If the CWD has determined the applicant/recipient is unable to provide the required verification to determine income for eligibility purposes, the CWDs may utilize TWN to verify income and employment information at application, mandatory mid-period reports, or redetermination for CalWORKs. The applicant/recipient must verify the information on TWN is correct prior to the CWD applying the income information to the case. If the applicant/recipient fails or refuses to verify required information to determine eligibility at application, mid-period, or redetermination for CalWORKs, the CWD must take the appropriate actions according to program rules. As a reminder, [MPP Section 40-126.35](#) requires CWDs to determine if required verification of eligibility is already in the

possession of the county and CWDs may not require the client to resubmit if the required verification is already in the case file.

If TWN report used to determine eligibility provides information beyond what was reported on the application for benefits showing the client potentially missed a mandatory report (i.e. income over IRT), the CWD must attempt to verify the discrepancy by sending a client verification letter in accordance with [MPP Section 20-006.543](#). If the client fails or refuses to respond with sufficient information to clear the discrepancy, the CWD must consider the income reported by TWN as verified and determine its effect on eligibility.

[ACL No. 19-08](#) authorizes the use of TWN for Welfare-to-Work (WTW) and Stage One Child Care. The CWD must obtain written authorization from the household prior to utilizing household information obtained from a consumer credit report, including TWN. The CWDs may use TWN to verify income and employment information at application, redetermination, and to determine ongoing eligibility for CalWORKs and Stage One Child Care. For WTW, TWN may be used to verify income and employment information for Work Participation Rate (WPR) purposes. The CWDs are permitted to use TWN monthly, or as needed, to submit information for Temporary Assistance for Needy Families (TANF) WPR data reporting purposes in the CalWORKs program. The CWDs may also use TWN to verify income when transitioning clients from Stage One Child Care to Stage Two Child Care.

WRITTEN AUTHORIZATION

According to [WIC section 11023](#), for determining CalFresh or CalWORKs eligibility or benefit level, the CWD Eligibility Worker must obtain written authorization from an applicant or recipient prior to obtaining information from TWN. Please note that for CalFresh, an individual's signature on the [SAWS 2 PLUS](#) - Application For CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs, the [CF 285](#) - Application For CalFresh Benefits, or the [CF 37](#) - Recertification for CalFresh Benefits, does not authorize CWD Eligibility Workers to obtain a consumer credit report for all household members listed in the home. It only allows the CWD Eligibility Worker to obtain information from TWN for the individual who signed the application or form. The CWD Eligibility Worker can obtain the written authorization for additional household members by completing the [CW 2200](#) - Authorization for Release of Information, the [ABCDM 228](#) – Applicant's Authorization for Release of Information or a written client statement. Whether using the [CW 2200](#), [ABCDM 228](#), or a written client statement, the written authorization must specify the CWD can obtain their consumer credit reporting information from Equifax Workforce Solutions LLC. Written authorization may be provided by electronic signature. For more information on electronic signature methods, please reference [ACL No. 22-20](#) and [ACL No. 17-57](#).

Nothing in this letter will be construed to prohibit CWDs from utilizing TWN for the R-IEVS, SIU, or fraud activities as described in [ACL No. 19-08](#) and [ACL No. 21-16](#).

RECIPIENT INCOME ELIGIBILITY VERIFICATION SYSTEM (R-IEVS)

Per [ACL No. 19-08](#), the CWDs may use TWN to substantiate R-IEVS information when determining whether a required report, such as income over the household's IRT, was missed in the CalFresh and/or CalWORKs programs. The CWDs are reminded TWN must not be used as an income verification tool in response to a New Hire Registry (NHR) match.

In accordance with [MPP Section 20-006.543](#), the CWDs must verify all discrepant R-IEVS match information. The CWDs are reminded clients are given the first opportunity to verify all discrepant R-IEVS information. This is done by sending a 10-day client verification letter, such as the [CW 2200](#) form. If a client fails or refuses to respond to the 10-day letter, the CWD must contact the appropriate income or benefit source.

Per [ACL No. 21-16](#), the CDSS considers TWN to be an appropriate income source for the purpose of verifying R-IEVS discrepancies. If TWN provides information to verify an R-IEVS discrepancy, in instances where the client fails or refuses to respond to the 10-day letter, the CWD shall apply the income absent other information, and take appropriate action or document that no action is required.

INFORMATION ON TWN BEYOND IEVS REPORT

Per [ACL No. 21-16](#), if TWN provides information beyond what was reported in an R-IEVS match, showing the client potentially missed a mandatory report (i.e. income over IRT), the CWD must attempt to verify the discrepancy by sending a client verification letter in accordance with [MPP Section 20-006.543](#). If the client fails or refuses to respond with sufficient information to resolve the discrepancy, the CWD must consider the income reported by the appropriate third-party payroll source as verified absent other information and determine its effect on eligibility in accordance with program rules. The CWD must assess any over issuances (OIs) and/or overpayments (OPs) in accordance with program rules for the months the client failed to report income over their IRT. If the third-party payroll source information shows current income, the CWD must apply program rules to determine if the income affects current benefit levels.

CWDs are reminded they are not authorized to access TWN reports for periods in which there is not an R-IEVS report in their possession showing the client potentially missed a mandatory report. CWDs are only authorized to access TWN reports that will assist in verifying the discrepant R-IEVS match in instances where the client fails or refuses to respond to a 10-day client verification letter.

Nothing in this letter will be construed to prohibit CWDs from utilizing TWN for the R-IEVS as described in [ACL No. 19-08](#) and [ACL No. 21-16](#).

SPECIAL INVESTIGATIONS UNIT (SIU)

Per the [ACL No. 19-08](#), the SIU may contact the appropriate income source, benefit source, resource, and/or utilize TWN to verify the R-IEVS information without prior authorization. Per [MPP Section 20-006.543\(d\)](#), the SIU is not required to send a written notice to the recipient informing them of the potential R-IEVS discrepancy on an SIU referred case.

The CWDs are reminded the SIU is not authorized to make eligibility determinations. If information on TWN report is verified, it must be provided to eligibility staff to determine its effect on eligibility and take appropriate action when necessary.

CONSUMER RIGHTS

Per [ACL No.16-118](#), if the CWD takes an adverse action based on information obtained through the Work Number®, the household must be provided timely notification (i.e. 10 days prior to action) via a Notice of Action (NOA) that includes the following information: the name, address, and telephone number of the Work Number® (including a toll-free telephone number); a statement that the Work Number® did not make the adverse decision and is not able to explain why the decision was made; a statement setting forth the consumer's right to obtain a free disclosure of the consumer's file from the Work Number® if the consumer makes a request within 60 days; and a statement setting forth the consumer's right to dispute directly with the Work Number® the accuracy or completeness of any information provided by the Work Number®. When use of information obtained through a consumer credit report results in an adverse action, the CWD must provide the household with the [GEN 1390](#) (3/17): Informing Notice – Regarding an Action Taken on Your Case in conjunction with existing NOAs. Please see [ACL No.16-118](#) issued on December 30, 2016, for additional information on consumer credit report noticing requirements.

COPIES AND TRANSLATIONS

Forms referenced in this letter are available on the [CDSS Forms/Brochures](#) webpage. When CDSS completes all translations of a form, they are posted on the [Translated Forms and Publications](#) webpage. When made available by CDSS, forms translated into an individual's preferred language must be provided to the individual pursuant to [Manual of Policies and Procedures \(MPP\) Section 21-115.2](#). For questions on translated materials, please contact Language Services at (916) 651-8876. If

translations are not available, recipients who have elected to receive materials in languages other than English should be sent the English version of the form or notice along with the [GEN 1365 - Notice of Language Services](#) and a local contact number.

Per [Government Code Section 7290, et seq.](#), the County Welfare Departments (CWDs) must ensure that effective bilingual services are provided. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, and qualified employees of other agencies or community resources. These services must be provided, free of charge, to the applicant/recipient. If CDSS does not provide translations of a form, it is the county's responsibility to read and interpret the form if an applicant or recipient requests it.

Additionally, the CWDs must provide auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision, or manual skills, where applicable. More information regarding provisions for services to applicants and recipients who have limited English proficiency or who have disabilities can be found in [MPP Section 21-115](#) and [ACL 19-45](#).

If you have any questions or need additional guidance regarding training or access to TWN, contact DataAccessUnit@dss.ca.gov.

If you have any questions or need additional guidance regarding CalFresh program guidance in this letter, contact CalFreshPolicy@dss.ca.gov.

If you have any questions or need additional guidance regarding CalWORKs program guidance in this letter, contact CWEligibilityPolicy@dss.ca.gov.

If you have any questions or need additional guidance regarding R-IEVS or SIU guidance in this letter, contact PIBPolicyUnit@dss.ca.gov.

Sincerely,

Original Document Signed By

RYAN GILLETTE
Deputy Director
Research, Automation, and Data Division