

June 26, 2024

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 24-44

The purpose of this All County Letter is to transmit the new California Work Opportunity and Responsibility to Kids Non-Work Social Security Number Request Form (GEN 2101) for use when assisting non-citizens in obtaining non-work Social Security Numbers from the Social Security Administration and to provide County Welfare Departments with guidance regarding its use.



KIM JOHNSON
DIRECTOR

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

June 26, 2024

ALL COUNTY LETTER (ACL) NO. 24-44

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL CALFRESH PROGRAM SPECIALISTS
ALL COUNTY WELFARE-TO-WORK COORDINATORS
ALL COUNTY CONSORTIA PROJECT MANAGERS
ALL COUNTY REFUGEE COORDINATORS
ALL REFUGEE CASH ASSISTANCE CONTACTS
ALL TRIBAL TANF ADMINISTRATORS

SUBJECT: **OPTIONAL NON-WORK SOCIAL SECURITY NUMBER
REQUEST FORM (GEN 2101) FOR CALIFORNIA WORK
OPPORTUNITY AND RESPONSIBILITY TO KIDS (CALWORKS),
CALFRESH, AND CALIFORNIA FOOD ASSISTANCE PROGRAM
(CFAP)**

REFERENCE: [PROGRAM OPERATIONS MANUAL SYSTEM \(POMS\) SECTION 10211.600](#); [7 CODE OF FEDERAL REGULATIONS \(CFR\) 7 CFR 273.6\(a\)](#) AND [7 CFR 273.6\(d\)](#); [GOVERNMENT CODE SECTION 7290](#); [WELFARE AND INSTITUTIONS CODE \(W&IC\) SECTION 11268](#); [ACL No. 19-45](#) AND [ACL NO. 23-57](#); [ALL COUNTY INFORMATION NOTICE \(ACIN\) NO. I-54-01](#); MANUAL OF POLICIES AND PROCEDURES (MPP) SECTIONS [21-115.2](#), [40-105.211](#), [40-105.212](#), [40-209](#), [63-404.1](#) AND [63-404.5](#);

The purpose of this ACL is to transmit the new CalWORKs [Non-Work Social Security Number Request Form \(GEN 2101\)](#) for use when assisting non-citizens in obtaining Social Security Number (SSN) cards from the Social Security Administration (SSA) and to provide County Welfare Departments (CWDs) with guidance regarding its use. This form may also be used for CalFresh and California Food Assistance Program (CFAP) purposes, as described below.

BACKGROUND

CalWORKs applicants are required to provide their SSN or submit verification of a complete application for an SSN card within 30 days following the date of application for assistance pursuant to [W&IC section 11268](#) and [MPP section 40-105.211](#).

Additionally, [MPP section 40-105.212\(a\)](#) states that if a CalWORKs applicant cannot provide an SSN, the individual must submit verification of a complete SSN card application to the CWD within 30 days following the date of application for CalWORKs. The applicant must provide the SSN to the CWD once received, per [MPP section 40-105.212\(b\)](#).

If the applicant is unable to provide their SSN or verification of a complete SSN card application on their own, the CWD must make every effort to assist the individual in obtaining the documents necessary to submit a complete application for an SSN card. If the applicant cannot complete the application for an SSN card because the necessary documentation is not immediately available, the CWD must determine if good cause exists as outlined in [MPP section 40-209](#).

Furthermore, [ACIN No. I-54-01](#) provided information on how counties could assist a non-citizen CalWORKs applicant in obtaining a non-work SSN card and included a sample template letter for requesting a non-work SSN card from the SSA. However, the information in the ACIN and on the sample template letter is outdated and does not satisfy the current requirements for obtaining a non-work SSN as articulated in the SSA [POMS](#).

The SSA will no longer accept letters following this template as evidence that a non-citizen has a valid non-work reason for an SSN.

The California Department of Social Services (CDSS) has consulted with the SSA to develop a new statewide Non-Work SSN Request Form for counties to use when assisting non-citizen applicants with meeting SSN requirements for CalWORKs, CalFresh, and California Food Assistance Program (CFAP) applicants and recipients.

GUIDANCE

CalWORKs

The new [Non-Work Social Security Number Request Form \(GEN 2101\)](#) has been developed in consultation with the SSA and may be used when assisting CalWORKs applicants who are non-citizens in obtaining a non-work SSN when all other eligibility criteria have been met. According to SSA regulations, the form must be completed in its entirety and include the wet signature of an authorized county management official or management designee to be accepted.

The form is not a required form and CWDs have the option to use county forms. However, CWDs are encouraged to utilize this form when requesting non-work SSNs as it has been reviewed and approved by the SSA.

CALFRESH AND CFAP

County use of the new [GEN 2101](#) is not mandatory for CalFresh or CFAP but may be used at county option when assisting non-citizen CalFresh applicants. Per [MPP section 63-404.1](#) and [7 CFR 273.6\(a\)](#), households must provide the CWD with the SSN of each household member or must provide verification of application for an SSN prior to certification. A non-work SSN may be used to satisfy the CalFresh SSN requirement.

As a reminder, individuals that refuse or fail to comply without good cause are ineligible for CalFresh benefits. Per [7 CFR 273.6\(d\)](#) and [MPP section 63-404.5](#), CWDs may grant good cause to CalFresh households for failure to comply with the SSN requirement to apply for or provide the CWD with an SSN. Documentary evidence or collateral information that the household member has applied for an SSN or made every effort to provide SSA with the necessary requirements must be considered good cause for not complying timely with the SSN requirement. CWDs are reminded to make every effort to assist the individual in obtaining such documents. Delays due to illness, lack of transportation, or temporary absences are not considered good cause. Household members granted good cause are eligible to CalFresh benefits for one month in addition to the month of application. Thereafter, good cause must be shown monthly in order to continue to be eligible for CalFresh benefits until the household member provides the CWD with proof of application or an SSN.

The State of California provides food benefits through the CFAP for certain non-citizens who do not qualify for federal benefits. In general, the CFAP adheres to the same rules as CalFresh for both SSN and non-SSN holders. However, trafficking victims, crime victims and domestic violence survivors are not required to have an SSN to be eligible for CFAP ([MPP section 63-403.211](#)). In addition, once CFAP eligibility is expanded to include all individuals aged 55 and over, regardless of immigration status, applicants who state that they do not have an SSN will still be evaluated for CFAP eligibility based on all other criteria. See [ACL No. 23-57](#) for further information on the CFAP expansion. CWDs must not ask the expansion group to obtain an SSN, and do not need to provide a non-work SSN letter to those applicants.

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 [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 CWD must ensure 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 CWD 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 No. 19-45](#).

If you have any questions or need additional guidance regarding the information in this letter, contact the CalWORKs Early Engagement and Eligibility Bureau at CWEligibilityPolicy@dss.ca.gov.

For any questions or need additional guidance, contact the CalFresh Policy and Employment Bureau at CalFreshPolicy@dss.ca.gov or CFAP Bureau at CFAP@dss.ca.gov.

Sincerely,

Original Document Signed By

ALEXIS FERNÁNDEZ GARCIA
Deputy Director
Family Engagement and Empowerment Division