This letter serves as an annual reminder for counties that, as agents of the California Department of Social Services (CDSS), County Welfare Departments and County Probation Departments must ensure they and their subrecipients of federal funds are not debarred nor suspended from receiving federal funds. Counties are required to submit their Employer Identification Number or Individual Tax Identification Number to CDSS by May 1, 2019, to facilitate the verification of their eligibility to receive these funds. Counties are also responsible for verifying the System for Award Management status of their subrecipients and contractors.
COUNTY FISCAL LETTER (CFL) NO. 18/19-64

TO: ALL COUNTY WELFARE DIRECTORS
    ALL COUNTY FISCAL OFFICERS
    ALL COUNTY AUDITOR CONTROLLERS
    ALL CHIEF PROBATION OFFICERS

SUBJECT: EMPLOYER IDENTIFICATION NUMBER OR TAX IDENTIFICATION NUMBER VERIFICATION

REFERENCE: CFL NO. 17/18-70, DATED JUNE 19, 2018
            EXECUTIVE ORDER 12549
            TITLE 2 ELECTRONIC CODE OF FEDERAL REGULATIONS
            (CFR) 200.212
            TITLE 45 ELECTRONIC CFR 75.212

This letter serves as an annual reminder for counties that, as agents of the California Department of Social Services (CDSS), County Welfare Departments (CWDs) and County Probation Departments (CPDs) must ensure that they and their subrecipients of federal funds are not debarred nor suspended from receiving federal funds. Counties are required to submit their Employer Identification Number (EIN) or Individual Tax Identification Number (TIN) to CDSS by May 1, 2019, to facilitate the verification of their eligibility to receive these funds. Counties are also responsible for verifying the System for Award Management (SAM) status of their subrecipients and contractors.

Debarment and Suspension - County Responsibilities

Pursuant to federal regulations, CWDs must be in good standing with the federal government to receive federal funds. To ensure CWDs are not debarred nor suspended from federal financial assistance programs by any federal department or agency, CDSS must annually verify that the CWDs are not listed on the federal Excluded Parties Listing System prior to issuance of any federal funds.

To ensure accuracy of this verification, CWDs are required to submit to the CDSS the exact legal name of the entity and EIN or TIN that the CWD provided to the Internal...
Revenue Service during their application for an EIN or TIN. If a CWD is operating under multiple names or identification numbers, each name and identification number must be submitted. The information requested must be submitted via email by May 1, 2019, to CDSS at fiscal.systems@dss.ca.gov with “EIN or TIN for the County of (insert county name)” in the subject line. Counties should review the federal fund monitoring responsibilities for counties outlined in CFL No. 17/18-70.

Because CPDs operate as subrecipients of CWDs, it is the responsibility of CWDs to verify that their CPD subrecipients are in good standing with the federal government following the instructions detailed below.

**Verification Requirements for Subawards and Contracts - Subrecipient Responsibilities**


- Debarred nor suspended from federal financial assistance programs and activities
- Proposed for debarment
- Declared ineligible
- Voluntarily excluded from participation in covered transactions by any federal department or agency

An award or contract cannot be made to a subrecipient or contractor who has been identified as suspended or debarred from receiving federal funds. Additionally, counties must annually verify that the subrecipient and contractor remains in good standing with the federal government throughout the life of the agreement/contract. Counties may include a clause in their contracts/agreements in which the subrecipient or contractor certifies they are neither suspended nor debarred from receiving federal funds. However, if a county is authorized to make subawards or contracts under an award, it is ultimately responsible for verifying that the subrecipient or contractor is in good standing with the federal government.

Counties are required to fulfill their above-mentioned verification responsibilities using the federal [SAM](https://www.sam.gov). The federal SAM is an official website of the federal government through which counties can perform queries to identify if a subrecipient or contractor is listed on the federal SAM excluded list and thus suspended or debarred from receiving federal funds.
The following provides counties with specific instructions to verify and document that subrecipients and contractors are in good standing with the federal government:

- Counties must notify potential subrecipients and contractors that no entity may receive a subaward or contract from the county unless the entity has provided its Unique Entity Identifier (UEI) number, formerly known as the Data Universal Numbering System number. For more information about UEI terms, refer to the following: Award Term for System Award Management and Unique Entity Identifier.

- To ensure accuracy of the verification, counties should use the subrecipient’s or contractor’s exact name and Social Security Number or TIN to perform the SAM query.

- A copy of the query result should be printed and kept in the award/contract file as supporting documentation, as CDSS may request this documentation during an on-site fiscal monitoring review.

Any questions regarding this notification should be directed to fiscal.systems@dss.ca.gov.

Sincerely,

Original Document Signed By:

SALENA CHOW, Chief
Fiscal Forecasting and Policy Branch