



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
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GOVERNOR

January 20, 2016

ALL COUNTY LETTER NO. 16-02

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

TO: ALL COUNTY WELFARE DIRECTORS
 ALL CALWORKS PROGRAM SPECIALISTS
 ALL COUNTY REFUGEE COORDINATORS
 ALL COUNTY SPECIAL INVESTIGATIVE UNIT (SIU) COORDINATORS
 ALL COUNTY WELFARE-TO-WORK COORDINATORS
 ALL CALFRESH PROGRAM SPECIALISTS
 ALL COUNTY CONSORTIUM PROJECT MANAGERS
 ALL COUNTY DISTRICT ATTORNEYS
 ALL COUNTY IEVS COORDINATORS

SUBJECT: ACCESS TO PUBLIC ASSISTANCE CASE RECORDS
 REMINDERS AND NEW CASE RECORD INSPECTION
 REQUEST FORM

REFERENCE: SUPERSEDES ALL COUNTY LETTERS (ACL) NOS. [07-29](#) and [09-50](#); ALL COUNTY INFORMATION NOTICE (ACIN) NO. [1-97-10](#); MANUAL OF POLICIES AND PROCEDURES (MPP) SECTIONS [19-005.1](#), [19-005.2](#), [19-005.4](#), [19-006](#), and [22-073.232\(c\)](#); WELFARE AND INSTITUTIONS CODE (WIC) SECTIONS [10850](#) and [11206](#); HEALTH AND SAFETY CODE (HSC) SECTIONS [123110](#), [123115\(a\)\(1\)](#), [123115\(a\)\(2\)](#) and [123115\(b\)](#); EVIDENCE CODE (EC) SECTION [1040](#).

The purpose of this letter is to remind County Welfare Departments (CWDs) or counties of the statutory and regulatory requirements as well as current California Department of Social Services (CDSS) policies that govern the authority of an applicant or recipient (client) to inspect his or her case record. This letter incorporates information set forth in prior ACLs/ACINs about this subject and provides further clarifications, guidance, and recommendations for best practices. This letter clarifies the distinction between a

client's general ability to inspect his or her case record and a client's ability to inspect his or her case record when an administrative hearing has been requested. This letter discusses a client's ability to inspect documents relevant to a pending administrative hearing that are contained in a fraud investigative file. This letter supersedes instructions in ACL [07-29](#) and [09-50](#).

This letter pertains only to the following CDSS programs: California Work Opportunity and Responsibility to Kids (CalWORKs), CalFresh, state-funded Trafficking and Crime Victims Assistance Program (TCVAP) and Refugee Cash Assistance (RCA). A separate ACL will discuss what happens at a state hearing when the county makes a motion to exclude evidence based on a claim of privileged or confidential information.

I. CLIENT CASE RECORDS

Counties are required to maintain a record for each applicant and recipient that identifies each individual family, their address, and their household composition for CalWORKs (case record). The case record shall also identify each child, his/her parents, their address, and household composition. (MPP Section [48-001.1](#).)

In addition, the case record must include specific information, including: 1) the appropriate application form completed by or on behalf of the applicant; 2) all evidence obtained to support the linking and the non-linking factors of eligibility (the county may maintain a copy or a written record of the type of evidence and its pertinent content where the evidence has been returned to the applicant); 3) the original or a copy of pertinent forms completed during the determination or redetermination of eligibility, i.e., budget work sheets, authorizations, forms relating to inter-county transfers, etc.; 4) the basis for county action granting, denying, changing, not changing following a recipient mid-period report, delaying, cancelling, or discontinuing aid; 5) the computation of any overpayment and the basis for a conclusion that the overpayment is or is not subject to adjustment or repayment (If the overpayment is subject to repayment, a copy of any demands for repayment, the facts regarding the determination of the debtor's ability to repay and collection activity, unless this information is recorded centrally elsewhere); and 6) the worker's evaluation of the applicant's ability or inability to understand his/her program rights and responsibilities. (MPP Sections [48-001.111](#) - [48-001.116](#).)

In addition to the documents specified above, other documents related to the case that must be maintained in the case record include:

- 1) A record of any intraprogram status change as provided in MPP Section [40-183](#). (MPP Section [48-001.121](#));

- 2) For the recipient who is a patient in a public or private medical institution, all pertinent information to support the determination of eligibility or ineligibility. (Chapter [42-500.](#)) (MPP Section [48-001.131](#));
- 3) Each notation or entry in the case record whether it be on a form or supplemental narrative shall be dated and the person making the entry shall be identified. (MPP Section [48-001.141.](#)) This is also referred to as the “case narrative.”

Counties are also required to document the basis for an eligibility decision and the amount of grant or share of cost.

In the CalFresh program, counties are required to keep records to determine whether the program is being conducted in compliance with CDSS regulations (MPP Section [63-104.21\(e\)](#)) and to coordinate records and forms where there are separate public assistance records on the same food stamp (CalFresh) household. (MPP Section [63-104.21\(i\)\(4\).](#))

A case record may include documents and information pertaining to eligibility and case management, as well as information received from external sources such as Income and Eligibility Verification System (IEVS) printouts, medical information, employment information, and court orders.

The purpose of public assistance and social service records is to evidence eligibility and delivery of public social services. The applicant’s or recipient’s case record should only contain facts relevant to his or her case. (MPP Section [19-008.](#))

General Client Access to Inspect His or Her Own Case Record

In general, a client’s case record is confidential and not open to examination for any purpose not directly connected with the administration of the program. The exceptions to this general rule are very limited and are specified in statutes and regulations. In the limited circumstances when some portion of a case record may be inspected, counties must still ensure that confidential and privileged information is not disclosed.

WIC Section [10850\(a\)](#) provides:

“Except as otherwise provided in this section, all applications and records concerning any individual made or kept by any public officer or agency in connection with the administration of any provision of this code relating to any form of public social services for which grants-in-aid are received by this state

from the United States government shall be confidential, and shall not be open to examination for any purpose not directly connected with the administration of the program...” (Emphasis added.)

WIC Section [10850.2](#) provides an exception to this general rule when a client desires to inspect his or her own case record:

“Notwithstanding the provisions of Section [10850](#), factual information relating to eligibility provided solely by the public assistance recipient contained in applications and records made or kept by any public officer or agency in connection with the administration of any public assistance program shall be open for inspection by the recipient to which the information relates and by any other person authorized in writing by such recipient.” (Emphasis added.)

This authorization for limited client inspection is reiterated in MPP Section [19-005.1](#).

WIC Section [11206](#) provides additional authority for a client to inspect documents in his or her case record:

“In case of dispute, the application and supporting documents pertaining to his case on file in the department or on file in any county office shall be open to inspection at any time during business hours by the applicant or recipient or his attorney or agent.”

MPP Section [19-005.4](#) provides that a client “may inspect the case records including the entire case narrative [described in MPP Section [48-001.141](#)] relating to the applicant or recipient which are held by DSS, DHS or any agency supervised by DSS with the following exceptions listed in Section [19-006](#).” MPP Section [19-006](#) prohibits disclosure of privileged information as defined by the EC, which includes documents covered by the attorney-client privilege and the identity of an informer, among others. However, where the case record includes the client’s own medical records, the client is the holder of the privilege, so the privilege does not prevent a client from inspecting them.

General Access to Inspect a Case Record by a Person Authorized by the Client

In general, non-privileged, non-confidential documents in a case record may only be inspected by the client who is the subject of the case record. However, other persons or groups, on behalf of the client, may have authorization to inspect the same documents that the client has authorization to inspect. Specifically, a client may provide written authorization for another person or group—an authorized representative (AR)—to inspect the client’s case record. (MPP Section [19-005.2](#).) An AR may be anyone the client chooses, including legal counsel hired and retained by the client to represent the

client's interests. For purposes of this letter, any reference to "client" also includes a client's AR. Note: The AR authorized to inspect a client's case record may or may not be the same person acting as the AR for purposes of representing the client at an administrative hearing.

In addition to access by a client's AR, a parent or guardian of a minor is generally authorized to inspect documents in a case record that pertain to a minor with some exceptions, such as when a health care provider determines that inspection of a document retained by a CWD would have a detrimental effect on the provider's professional relationship with the minor patient or the minor's physical safety or psychological well-being (Health and Safety Code Section [123115\(a\)\(2\)](#)).

A written authorization for an AR to inspect documents in the client's case record must include the name of the AR and must be signed and dated by the client. (MPP Section [19-005.21](#).)

Once written authorization is provided, the AR is then authorized to inspect the same non-privileged, non-confidential documents that the client would be authorized to inspect. The written authorization shall expire one year from the date on the signed document unless the client expressly limits access by the authorized representative to a shorter period or informs the CWD that the authorization has been revoked. (MPP Section [19-005.21](#).) If the written authorization to inspect a client's case record pertains to a pending appeal or fair hearing (state administrative hearing), the time period, unless explicitly limited or revoked by the client, shall extend to the final disposition of the issue involved in the fair hearing or, where applicable by the courts. (MPP Section [19-005.21](#).)

Telephone authorizations may be accepted by a CWD in lieu of written authorization when the client has adequately identified himself or herself to the CWD (MPP Section [19-005.22](#)). CWDs should ensure that adequate forms of identification are provided by a client or AR prior to allowing access to inspect a case record. (MPP Section [19-005.22](#).)

A client is not required to provide written authorization to allow inspection of a case record by another person when a client is physically present, accompanied by the person, and verbally authorizes the person to inspect documents in his or her case record or when a caretaker relative is present with a child who is receiving CalWORKs. (MPP Section [19-005.21](#).)

Required and Recommended Practices to Facilitate Client Inspection of His or Her Case Record

CWDs should inform a client of the types of information and documents that are contained in his or her case record that he or she is authorized to inspect. Clients are not required to state their reason for requesting to inspect their case record. Questions regarding a client's request to inspect their case record should be limited to those necessary to assist the client in identifying the case record information they want to inspect.

CWDs must comply with a client's request to inspect his or her case record subject to the CWD's assessment and determination whether documents requested by a client are privileged (MPP Section [19-006](#)) or otherwise confidential under applicable laws such as Health and Safety Code Sections [123110](#) and [123115](#). Inspection should be provided as expeditiously as possible to ensure the client's needs are met (e.g., request may be related to a state hearing).

CWDs must allow a client to inspect non-confidential, non-privileged documents in his or her case record during normal business hours.

A client must be able to inspect a non-confidential, non-privileged document in his or her case record regardless of whether the document is maintained in paper or electronic format, including scanned documents that are uploaded and stored separately from the county consortia automated systems.

If a client requests to inspect a document in his or her case record that contains a mixture of privileged and non-privileged information as well as confidential and non-confidential information, the CWD should assess whether the privileged or confidential information can be redacted or obscured to allow the client to inspect the remaining non-privileged and non-confidential portions of the document. This may require the CWD to print a copy of the document, redact the privileged or confidential information, and allow the client to inspect a copy of the redacted document. There may be circumstances in which the CWD determines that the entire document must be withheld to protect privileged or confidential information. CWDs are strongly encouraged to consult with their county counsel in determining whether documents must be withheld or redacted to protect privileged or confidential information. Such consultations should be completed expeditiously to avoid an unwarranted delay in allowing a client to inspect his or her case record.

CWDs are strongly encouraged to establish and publish written policies to assist CWD staff in facilitating client requests to inspect a case record and to ensure that a client understands his or her right to inspect his or her case record.

Limitations on Access to Inspect a Case Record: Privileged or Confidential Information

As described above, CWDs must allow a client to inspect non-privileged, non-confidential documents in his or her own case record. However, a member of a household or Assistance Unit (AU) generally may not access a document that pertains to another member of the AU or household unless the member who is the subject of the document has signed a written release authorizing the inspection. For example, even routine information received from one adult in an AU should be assessed by CWDs to determine if another adult in the AU has authorization to inspect a requested document.

Other examples of information and documents that a client may not be authorized to inspect include: the whereabouts of an absent parent; information regarding the status of children removed from the home by Child Protective Services; domestic abuse; criminal background; mental health and substance abuse treatment; learning disabilities; information pertaining to minors authorized by law to consent to medical treatment; and information received from a third party that was not obtained pursuant to an authorization from the client. In such circumstances, CWDs are strongly encouraged to consult with county counsel to determine whether inspection is authorized.

There may be circumstances in which a CWD determines that a client may have authorization to inspect a document that does not pertain specifically to the client. For example, a client may be able to inspect the Maximum Family Grant (MFG) notice sent to another member of the AU, with appropriate redactions of the name and address of the other member. In addition, a client may be able to inspect income information reported by another member of the AU that resulted in an overpayment, with appropriate redactions.

Due to the wide variety of individual circumstances and non-disclosure provisions that might be applicable when responding to a client request to inspect documents in his or her case record, it is the responsibility of the CWDs to perform individual assessments of each client request to determine if and when a client has authorization to inspect a document in his or her case record in its entirety or as appropriately redacted.

Again, CWDs are strongly encouraged to consult with county counsel when assessing whether documents in a client's case record must be redacted or withheld based on privilege or confidentiality.

Client Access to Inspect His or Her Case Record When a Fair Hearing or Administrative Disqualification Hearing (ADH) is Pending or Being Considered

MPP Section [22-051](#) provides that, upon request, the CWD shall allow the claimant in a fair hearing to examine the case record during regular working hours consistent with

MPP Section [19-005](#). (MPP Section [22-051.1](#).) It also provides that if portions of the case record are privileged under the provisions of MPP Section [19-006](#), the claimant shall be entitled to inspect such material only if the claimant is the holder of the privilege. (MPP Section [22-051.11](#).) It further provides that the claimant shall have the right prior to and during the hearing to examine non-privileged information that the county has used in making its decision to take the action that is being appealed. (MPP Section [22-051.2](#).)

In addition, MPP Section [22-073.232\(c\)](#) provides that the CWD must provide any and all information that can be of assistance to the claimant in preparing for the hearing. This includes revealing to the claimant any and all regulations and evidence, including that which might be favorable to the claimant's case.

A client who has requested a fair hearing has the same authorization described in section I, above, to inspect non-privileged, non-confidential documents in his or her case record during business hours.

It should be noted that in addition to documents contained in the case record, the CWD must also reveal to the client laws and regulations applicable to the fair hearing, including those that are favorable to the client, and must reproduce without charge, or at a charge related to the cost of reproduction, the regulations and other policy materials necessary for a client or AR to determine whether a state hearing should be requested or to prepare for a state hearing. (MPP Section [22-051.3](#).)

The provisions of MPP Section [22-051](#), described above, also apply to ADHs in the CalFresh program (MPP Section [22-201.5\(a\)\(9\)](#)) and the CalWORKs program (MPP Section [22-305.5\(i\)](#)). A respondent in an ADH is authorized prior to the hearing to examine the non-privileged documents in the case record during regular working hours consistent with MPP Section [19-005](#) and during the hearing to examine non-privileged information that the county has used in making its decision to take the action that is the subject of the hearing. (MPP Section [22-051.2](#).) The respondent may inspect a document containing privileged information only if the respondent is the holder of the privilege.

II. FRAUD INVESTIGATIVE FILES

CWD Special Investigation Units (SIUs) are established as separate organizations, independent of the county organizations performing eligibility and benefit determination functions. (MPP Sections [20-005.2](#) and [20-007.21](#).) SIUs investigate activity that may constitute fraud and prepare investigative reports on completed investigations. (MPP Section [20-007.3](#).) SIU investigators have unrestricted access to CWD files, records,

and personnel that may be relevant to an investigation. (MPP Section [20-007.32.](#)) Investigative files created and maintained by SIUs are separate and distinct from the case records created and maintained by CWDs' eligibility and benefit determination personnel.

SIU investigative files are confidential under WIC Section [10850](#) and, similar to case records, disclosure is limited to actions connected with the administration of the program. However, inspection of investigative files is far more restricted than inspection of case records and, unlike client case records, SIU investigative files are not available for general inspection.

Information and documents contained in an SIU investigation file are confidential. (Title 45, Code of Federal Regulations, Section [205.50](#); WIC Section [10850](#).) The fact of, or information concerning, a referral to the SIU shall not be disclosed to unauthorized persons. (MPP Section [20-005.322.](#)) Unauthorized persons include a client, except when the information has been used or relied upon by the CWD in taking an administrative action and either a fair hearing on those issues has been requested or an ADH pertaining to that administrative action has been initiated.

The circumstances in which a document or information from an investigative file is authorized to be disclosed are limited to these three circumstances:

- 1) To prosecuting authorities involved in civil or criminal prosecutions in connection with the administration of the program. Information from an SIU investigative file may be provided to a prosecuting authority when the SIU refers a case to the prosecuting authority or when the prosecuting authority requests it. (MPP Section [20-005.1](#); MPP Section [20-007.35](#));
- 2) To other CWD staff when information in the SIU file is necessary for administration of the program, which includes initiating and pursuing an administrative action that may result in a state hearing or an ADH. (MPP Section [20-300.23](#); MPP Section [20-352.1](#));
- 3) To a client when the CWD has taken an administrative action and a hearing has been requested, subject to the CWD properly asserting that certain information is privileged or confidential, and subject to the documents being relevant to the issues in the pending hearing. Prior to and during the hearing, the client is authorized to examine relevant, non-privileged, non-confidential information and documents that the CWD has used in making its decision to take the administrative action that is the subject of the hearing. (MPP Section [22-051.2](#), MPP Section [22-201.5\(a\)\(9\)](#), and MPP Section [22-305.5\(i\).](#))

The CWD may not rely on or attempt to introduce any documents at hearing that it withheld from client inspection based on a claim of privilege or confidentiality, unless the Administrative Law Judge determines in an in camera proceeding that the documents are not privileged or confidential and takes them into evidence. The State Hearings Division will provide an ACL with more information about the in camera review process.

CWDs are strongly encouraged to consult with county counsel to ensure that documents in an SIU investigative file containing privileged or confidential information are not improperly disclosed. CWDs should work with the SIU to ensure that investigation files are created and maintained separately and distinctly from the case record, which may be subject to different disclosure requirements.

CWDs must ensure that any references contained in a case record to a referral to the SIU for a fraud investigation are not disclosed to unauthorized persons and are redacted as appropriate. (MPP Section [20-005.322](#).) Unauthorized persons include a client except when the information has been used or relied upon by the CWD in taking an administrative action and either a fair hearing has been requested or an ADH pertaining to that administrative action has been initiated. In addition, CWDs must ensure that the identities of individuals who provided information that initiated or furthered the fraud investigation have been redacted. (MPP Section [19-006](#).) However, if a CWD relies upon the testimony of a witness who may have been a confidential informant, the identity of the witness and the substance of his or her testimony may need to be provided to the claimant for the purposes of a fair hearing or an ADH. As a reminder, MPP Section [22-073.232\(c\)](#) provides that the CWD must provide any and all information that can be of assistance to the claimant in preparing for the hearing. CWDs are strongly encouraged to consult with county counsel when SIU fraud files are at issue.

III. BEST PRACTICES AND NEW FORM TO PROCESS REQUESTS

It is recommended that CWDs provide guidance and training to all CWD Eligibility Workers (EW) and Administrative Hearing Representatives on how to respond to a client request to inspect any part of his or her case record and how to assess whether a document should be withheld or redacted to protect privilege or confidentiality. For purposes of this letter, EW means any CWD staff who has the responsibility for or ability to determine eligibility or take actions that pertain to a client receiving public assistance from the applicable programs.

It is recommended that CWDs provide guidance to EWs and Administrative Hearing Representatives on how to inform a client of the types of documents that he or she is authorized to inspect. A client shall not be required to submit a Public Records Act request to inspect his or her case record. Counties may also not condition case record inspection upon requesting a hearing or upon issues listed in a hearing request. EWs and Administrative Hearing Representatives should ensure that they understand what documents the client wishes to inspect and should assist the client when warranted. An EW and Administrative Hearing Representative should schedule an appointment, if necessary, for a client to inspect his or her case record as soon as practical during normal business hours that will allow sufficient time, if needed, for the EW or Administrative Hearing Representative to review and determine if any of the requested documents should be withheld or redacted to protect privilege or confidentiality. The EW's review should be completed expeditiously to avoid an unwarranted delay. An EW should be prepared to provide a client access to inspect the requested documents at the scheduled appointment.

It is recommended that CWDs provide guidance to EWs regarding how to review a case record and how to determine when documents need to be redacted or withheld to protect privilege or confidentiality. It should be specifically noted that when a document contains privileged or confidential information, it does not necessarily mean that the document may be withheld, since the privileged or confidential information may be able to be redacted to allow a client to inspect the remaining non-privileged or non-confidential information in the document.

At the scheduled appointment, if applicable, EWs shall facilitate the document inspection by any combination of options below:

- (1) provide hard copies of the requested information or documents.
- (2) provide read-only access on the automated system to the client of the requested information or documents and hard copies of any documents the client would like to take with them.
- (3) if possible, provide a PDF file of the requested documents that have been scanned.

Regardless of the option used to facilitate the document inspection, hard copies of non-privileged or non-confidential information must be provided to the client if requested.

EWs should be capable of navigating or assisting a client to navigate through a CWD's automated system. EWs should carefully navigate through a CWD automated system in the presence of a client to ensure that the client does not inspect information that does not pertain to him or her or has been determined to be privileged or confidential,

unless the system has been programmed to prevent client access to privileged and confidential information and documents. In general, whether the client's inspection is conducted in paper or electronic form, the inspection should occur in an area that is secluded, to prevent other persons who are not authorized from inspecting the documents. EWs are not required to be present when a client inspects requested documents if the documents have been reviewed and confidential or privileged documents have been withheld or properly redacted.

New Form – Response to Request to Inspect Case Record

CWDs are required to use the new CDSS form "Response to Request to Inspect Case Record" form, CW 2213 (10/15). The CW 2213 documents the case records the client requested, records that were provided for inspection and records that he or she requested to inspect that have been withheld based on privilege or confidentiality. CWDs shall ensure that form CW 2213, or its approved substitute, is provided to a client at the time a client inspects the requested documents. A copy of the completed and signed form shall be retained in the client's case record. Please note that this form is to be used for inspection of CalWORKs, CalFresh, TCVAP, and Refugee Cash Assistance program case records only. CWDs are required to obtain prior approval from CDSS for any modifications to or substitutions of the form before the revised form may be used by the CWDs (CDSS Operations Manual Section [23-400.2](#), Approval Procedure.) Modifications to the form shall not conflict with applicable statutes, regulations, or CDSS policies. CWDs should begin using the attached form as soon as administratively possible, but no later than July 1, 2016.

If a dispute arises between a client and an EW regarding the requested inspection of all or portions of the case record, it is recommended that CWDs develop and implement a dispute resolution process that may include a review and assessment by a first line supervisor of the EW who prepared the information or documents for inspection. It is also recommended that CWDs identify reasonable timeframes in which a client will be informed of the CWD decision regarding the dispute. CWDs are strongly encouraged to post the dispute resolution process, if applicable, on their websites.

Applicable Fees for Duplication of Inspected Documents

1. Copying Fees for General Inspection:

CWDs may provide free copies of requested documents to client or may charge a client for copying the requested documents.

2. Copying Fees for a Fair Hearing or ADH:

Pursuant to MPP Section [22-051.3](#), CWDs shall "...reproduce without charge, or at a charge related to the cost of reproduction, the specific policy materials, including regulations, necessary for an applicant or recipient, or his/her authorized representative, to determine whether a state hearing should be requested or to prepare for a state hearing." In addition, MPP Section [22-051.31](#) provides, "In the Food Stamp (CalFresh) Program, such material shall be made available to the household or its authorized representative at no charge."

Inspection and Translation of Forms and Documents

CWDs are reminded that in accordance with the Americans with Disabilities Act (ADA), CWDs are required to provide reasonable accommodation (i.e., enlarged print, CDs, EW reading the documents, etc.) to a client who is unable to inspect requested documents from his or her case record in its original form.

For a camera-ready copy of the CW 2213 in English, contact the CDSS Forms Management Unit at fmudss@dss.ca.gov. If your office has internet access, you may obtain this form from the CDSS webpage at http://www.dss.cahwnet.gov/cdssweb/FormsandPu_271.htm.

When all translations are completed per MPP Section [21-115.2](#), they are posted on an on-going basis on the CDSS webpage. Copies of the translated forms can be obtained at http://www.dss.cahwnet.gov/cdssweb/FormsandPu_274.htm.

For questions regarding translated materials, please contact the CDSS Language Services at (916) 651-8876. Until translations are available, recipients who have elected to receive materials in languages other than English should be provided the English version of the form along with the [GEN 1365-Notice of Language Services](#) and a local contact number.

The CWDs shall ensure that effective bilingual services are provided to a client. This requirement may be met through utilization of paid interpreters, qualified bilingual employees, and qualified employees of other agencies or community resources. These services shall be provided free of charge to a client. In the event that CDSS does not provide translations of a form, it is the CWD's responsibility to provide interpreter services if an applicant or recipient requests them. More information regarding translations can be found in MPP Section [21-115](#).

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If you have any questions regarding this ACL, please contact the following programs:

CalWORKs Eligibility Bureau	(916) 654-1322
Employment Bureau	(916) 654-2137
CalFresh Policy Bureau	(916) 654-1896
Fraud Bureau	(916) 653-1826
Refugee Programs Bureau	(916) 654-4356

Sincerely,

Original Document Signed By:

TODD R. BLAND
Deputy Director
Welfare to Work Division

Attachment

RESPONSE TO REQUEST TO INSPECT CASE RECORD CALWORKS, CALFRESH, TCVAP, AND REFUGEE PROGRAMS

CLIENT NAME:	CLIENT CASE NUMBER:
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AUTHORIZED REPRESENTATIVE: _____

You or your Authorized Representative (AR) have the right to inspect your entire case record, except for information that has been determined to be privileged or confidential by the County Welfare Department (CWD).

On _____, you or your AR requested to inspect:
DATE

- Your entire case record for: CalWORKs CalFresh TCVAP Refugee Cash Assistance
- A portion of your case record CalWORKs CalFresh TCVAP Refugee Cash Assistance including:

The CWD is providing you or your AR access to inspect:

- The entire case record for: CalWORKs CalFresh TCVAP Refugee Cash Assistance
- The portion of the case record requested for: CalWORKs CalFresh TCVAP Refugee Cash Assistance

The CWD has removed documents or redacted the information determined to be privileged or confidential based on the following:

- Confidential information about another adult or head of household in or out of the home. The CWD can authorize inspection of this information if the person signs a release form giving you permission to inspect this information. If removed, number of removed documents: _____
- Mental health records. If removed, number of removed documents: _____
- Whereabouts of an absent parent received from a Child Support Agency. If removed, number of removed documents: _____
- Child Protective Services reports or information regarding the whereabouts of children removed from the home by Child Protective Services. If removed, number of removed documents: _____
- Other _____ If removed, number of removed documents: _____

For questions or to discuss your request to inspect some or all information and documents of your case record, please contact _____.

PREPARED BY:

NAME AND TITLE OF PREPARER:	DATE:
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