



A Tradition of Stewardship  
A Commitment to Service

NAPA COUNTY HEALTH AND HUMAN SERVICES AGENCY  
Self Sufficiency Services Division

**POLICY AND PROCEDURE:**

**The Work Number**

**REVIEW FREQUENCY:**

Every two years

POLICY # 2000601-5001-19

**DISTRIBUTION:**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Employment Services | <input checked="" type="checkbox"/> Eligibility Services |
|   | <input checked="" type="checkbox"/> Quality Mgmt         |

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APPROVAL:	<i>Jana Baatista</i>	4/08/19
	Eligibility Services Manager	Date
APPROVAL:	<i>Teresa Brown</i>	4/8/19
	Employment Services Manager	Date
APPROVAL:	<i>Lynn Perez</i>	4/8/19
	SSSD Deputy Director	Date
APPROVAL:	<i>Dir Yumet</i>	4-9-19
	HHSA Director	Date

**POLICY STATEMENT:**

It is the policy of the Napa County Health and Human Services Agency (NCHHSA) to assist clients in obtaining employment income and hours verification, when the client is unable to obtain the information through personal means.

**ADMINISTRATION:**

- Eligibility Worker (EW)
- Employment Services Worker (ESW)

**DEFINITIONS:**

**Adverse Action** – a determination of ineligibility for CalWORKs or CalFresh or a reduction in benefits or services.

**The Work Number (WN)** – an online lookup system which uses a data warehouse of over 200 million records provided by over 3100 employers in the United States. This tool allows users to go to a secure website and The Work Number can provide instant employment verification data, such as employee earnings and hours worked.

**END OF POLICY**

## PROCEDURE

### **I. Accessing The Work Number**

- A. Staff who wish to access WN must obtain approval from his/her supervisor and then complete a Work Number Usage Statement form and send it to the CalWORKs Analyst to obtain sign on information. (See Attachment #1)
- B. Staff may access WN by going to the website at [www.theworknumber.com](http://www.theworknumber.com)
  1. Staff will access the site by choosing the "Log In" button under Social Service Verifiers.

### **II. Use of The Work Number**

- A. The WN access is for initial and ongoing eligibility along with fraud detection in the CalWORKs (CW), CalFresh (CF), Welfare-to-Work (WTW), and Stage One Child Care programs only.
- B. The WN cannot be pulled for Medi-Cal (MC) only purposes, however use of The WN information shall be used in the MC program as follows:
  1. At application, existing WN information pulled for CW and/or CF purposes shall be used in determining eligibility for MC.
  2. Information present in a county case file is required to be reviewed at annual redetermination and at a change in circumstance redetermination before requesting verification from the beneficiary.
  3. An ex parte review should include the review of information from cases or programs that are either open or were closed within the last 90-days, which would include any available commercial income verification reports (WN). The EW should evaluate the veracity and age of the information as they would any other available income information.
- C. The WN provides information given by Employers including: Employee Name and Social Security Number, Employment Status, Most Recent Start Date and Termination Date (if applicable), Total Time with Employer, Job Title, Rate of Pay, Average Hours per Pay Period, Total Pay for Past 2 years, and the most recent twelve pay periods of Gross Earnings.
  1. WN verification can provide up to 36 months of pay dates, period ending dates, number of hours worked, and gross earnings.
  2. Not all employers report and a "No Record" response does NOT mean that the client is not employed.
- D. The WN may be used in conjunction with, but not in lieu of, existing required income and eligibility sources, including Applicant and Recipient IEVS.
- E. Staff must obtain written authorization annually from the applicant/recipient to verify employment and income through the WN service. Written authorization may include any of the following with a valid customer signature:
  1. SAWS 1 – Initial Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs.
  2. SAWS 2 Plus – Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs.
  3. ABCDM 228 – Release of Information
  4. CF 285 – Application for CalFresh and Benefits
  5. CF 37 – Recertification for CalFresh Benefits
- F. Staff are permitted to use the information obtained from WN in the same manner as information is used that is provided by the employer. Such uses may include, but are not limited to:
  1. Actual hours for WTW work verification
  2. Actual hours for WINS verification
  3. Applicant/recipient is unable to provide necessary verification
  4. Income Determinations such as:

- a. Verification of regularity of receipt of income
  - b. Gross or net amount of income
  - c. Whether income is excluded or exempt
  - d. To determine year-to-date information
- G. All searches conducted on the WN website should be printed virtually to Image Now and indexed into C-IV when used as verification.
- H. Every time The WN is accessed, the EW/ESW must create a C-IV journal entry that must include, at minimum, the following:
- 1. Reason for use (applicant/recipient unable to provide verification, etc.)
  - 2. Written authorization in the case (signed SAWS 2 Plus, SAWS 1, ABCDM 228, CF 285, or CF 37)
  - 3. Information that was/was not verified
  - 4. Discussion with applicant/recipient about accuracy of information, if applicable.

### **III. Use of The Work Number in the CalFresh and CalWORKs Programs**

- A. The applicant/recipient has the primary responsibility for providing verification such as wage stubs, to verify information. If verification of income is unavailable, for example because a household member did not provide or does not have access to the necessary verification at the time of application or interview, the WN can be used to verify income in real time at application or during annual renewal.
- 1. The applicant/recipient must be consulted before using the information provided by The WN.
    - a. The EW may consult with the applicant/recipient verbally.
      - 1) C-IV Journal must include information regarding the outcome of the verbal consultation.
  - 2. If the information provided by The WN is not discrepant with the written information provided by the applicant/recipient on the application, periodic report, annual renewal, or other form, verbal consultation is not necessary.
- B. If the applicant/recipient confirms that the information provided by The WN is accurate, the WN can be used to verify income.
- C. If the applicant/recipient does not agree with the information obtained through the WN, additional documentation shall be requested from the applicant/recipient by using the CW 2200.
- 1. Additional information shall also be requested if The WN is incomplete or the household has income from an additional source.
- D. If staff and the applicant/recipient elect to use information obtained from The WN to determine benefit level, staff shall not require the applicant/recipient to submit hard-copy documentation that is duplicative of the information obtained from The WN.
- E. Information received from The WN is not considered verified upon receipt (VUR) in the CalFresh program.
- F. The WN should not be used to verify a mandatory report of income over the Income Reporting Threshold (IRT).

### **IV. Use of The Work Number in the Welfare-to-Work and Stage One Child Care Programs**

- A. ESWs may use The WN to verify income and employment information to determine ongoing eligibility for Stage One Child Care.
- 1. ESW may use The WN to verify income when transitioning clients from Stage One Child Care to Stage Two Child Care.

- B. ESWs may use The WN to verify income and employment information in the WTW program for Work Participation Rate (WPR) purposes.
  - 1. ESWs are permitted to use The WN monthly, or as needed, to submit information for WPR data reporting purposes.
- C. If a participant disagrees with information obtained from The WN, the ESW shall request additional information from the participant by using the CW 2200.

#### **V. Use of The Work Number for Program Integrity**

- A. Staff may use The WN according to the following guidelines to substantiate Applicant and Recipient IEVS information when determining whether a household missed a required report of income over the household's IRT or any other CF/CW required reporting requirements:
  - 1. Staff must verify the IEVS data by sending a client verification letter requesting the recipient respond within ten (10) days.
  - 2. If the recipient does not respond to the client verification letter, or responds and is unable to provide sufficient information to resolve the discrepancy, staff shall contact the appropriate income or benefit source.
    - a. If the appropriate income or benefit source is available via The WN, staff must use The WN as the independent verification source.
    - b. If the appropriate income or benefit source is not available via The WN, staff must request verification from the third party source/employer.
- B. The Special Investigations Unit (SIU) is not required to send a written notice to the recipient informing the recipient of the potential Applicant or Recipient IEVS discrepancy on an SIU referred case.
  - 1. In these cases, SIU may contact the appropriate income source, benefit source, resource, and/or utilize The WN to verify the Applicant or Recipient IEVS information.
- C. The WN must not be used as an income verification tool in response to receiving the New Hire Registry (NHR) match.

#### **VI. Adverse Actions**

- A. Anytime a case action is taken to deny, decrease, or discontinue benefits due to information obtained from the WN, the EW shall attach the GEN 1390 – Informing Notice – Regarding an Action Taken on Your Case to the denial, decrease, or discontinuance Notice of Action (NOA).
  - 1. GEN 1390 can be printed from C-IV and should include the following information:
    - a. Name of Agency Providing Notice = Napa County Health and Human Services
    - b. By Telephone = 1-800-367-2884
    - c. By Mail = 11432 Lackland Road, St. Louis, MO 63146
    - d. On the Web = [www.theworknumber.com](http://www.theworknumber.com)
  - 2. EW must locally print the change/denial/discontinuance NOA and attach the GEN 1390 and mail it to the applicant/recipient.
    - a. Image and index the GEN 1390
- B. Staff must document all actions taken in the C-IV Journal.
- C. If an applicant/recipient calls to dispute any of the information obtained from The Work Number, the applicant/recipient must contact The Work Number to make the dispute.

#### **VII. Data Security**

- A. Staff shall maintain any and all information/data provided by WN in strict confidence, and will not reproduce, disclose, or make accessible in whole or in part, in any manner whatsoever, to any third party, unless mandated by law.
- B. Only authorized users may access the WN service. If a worker does not have access, however believes he/she should have access, refer to Section 1.
- C. Staff may not use the WN for any personal reasons nor pull information from WN for any other staff person or outside entity. Unauthorized access to the WN may subject staff to civil or criminal liability.
- D. Staff shall only access WN from his/her work desktop computers. Personal computers or non-county owned computers may never be used. WN may also not be accessed via laptops or any unsecured wireless hand-held communications devices, including but not limited to, web enabled cell phones, personal digital assistants (PDAs), mobile data terminals, and portable data terminals, or other portable devices.
  - 1. A laptop may only be used if the worker only has a laptop as his/her desktop computer.
- E. Staff should never leave the WN website open and signed in at any time when not in use. Sign out and ensure the computer is locked (ctrl-alt-del) at all times when not in use.
- F. Any information obtained from WN and printed, must be placed in the shred boxes as soon as the document has been imaged into the C-IV system. WN information should never be saved to a desktop computer at any time.
- G. Staff must follow all other confidentiality requirements as written in the Self Sufficiency Services Division Confidentiality Procedure.
- H. Staff will be monitored to ensure compliance with the data security requirements.

#### **REFERENCES:**

ACIN [I-41-14](#) – The Work Number Express Service Pilot Program  
ACL [02-42](#) – Use of the Work Number for Employment Verification in the CW Program  
ACL [16-43](#) – The Work Number Express Agreement Guidance  
ACL [16-118](#) – CW and CF Noticing Requirements for Usage of Consumer Credit Reports  
ACL [19-08](#) – Use of The Work Number for CalFresh, Across CalWORKs Programs and Program Integrity  
ACWDL [18-21](#) – MC Supplemental Income Verification  
ACWDL dated [January 13, 2016](#)  
Confidentiality Procedure

#### **FORMS**

GEN 1390 – Informing Notice – Regarding an Action Take on Your Case  
Work Number Usage Statement

#### **CONTACT PERSON(S):**

Shanna Gardner, Staff Services Analyst

#### **END OF PROCEDURE**

#### **REVISION HISTORY:**

Revision	Date	Description of Change	Requested By
0.0	05-25-16	Procedure Created. Issued in 30 day working draft.	S. Gardner, SSA
0.1	08-04-16	Finalized procedure. No changes	S. Gardner, SSA
1.0	04-08-19	Biennial Review. Updated to include <ul style="list-style-type: none"> <li>• ACL 16-118;</li> <li>• SDT Newsflash Dated 02/10/17;</li> <li>• ACWDL 18-21</li> <li>• ACL 19-08.</li> <li>• No longer required to send the Universal Agreement (Work Number NOA Attachment)</li> </ul>	S. Gardner, SSA

### WORK NUMBER USAGE STATEMENT

As a Napa County, Health and Human Services employee, it is my duty to protect any and all confidential information obtained while completing the requirements of my job. Use of The Work Number (WN) is a confidential resource and I must treat all information obtained through this program as confidential information as outlined in the Confidentiality Procedure.

I understand that I shall maintain any and all information/data provided by the Work Number in strict confidence, and will not reproduce, disclose, or make accessible in whole or in part, in any manner whatsoever, to any third party, unless mandated by law.

I understand that only authorized users can access the WN service. By signing this statement, it is my understanding that I will receive access to the Work Number as an authorized user.

I understand that I may not use the WN for any personal reasons nor pull information from WN for any other staff person (regardless if they are an authorized user or not) nor outside entity.

I understand that unauthorized access to the WN may subject me to civil or criminal liability.

I understand that I shall only access WN from my county workstation. Personal computers or non-county owned computers may never be used. WN may also not be accessed via laptops (unless it is your county workstation) or any unsecured wireless hand-held communication devices, including but not limited to, web enabled cell phones, personal digital assistants (PDAs), mobile data terminals, and portable data terminals, or other portable devices.

I understand that I shall never leave the WN website open and signed in at any time when not in use. I will sign out and ensure my computer is locked (ctrl-alt-del) at all times when not in use.

I understand that any information obtained from WN that is printed, must be placed in the Shred-It boxes as soon as the document has been imaged into the C-IV system. WN information should never be saved to my desktop computer at any time. WN pages should be virtually printed to Perceptive Concept whenever possible.

I understand that I must follow all other confidentiality requirements as written in the Confidentiality Procedure.

I understand that I will be monitored to ensure compliance with the data security requirements. This will be completed by reviewing a random sample of submissions to WN each month.

I have reviewed this usage statement in its entirety and understand all requirements as written.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date