



CALFRESH EMPLOYMENT AND TRAINING MANAGEMENT EVALUATION REPORT FOR SACRAMENTO COUNTY

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Introduction

On September 8 through September 10, 2020, the California Department of Social Services (CDSS) conducted a CalFresh Employment and Training (E&T) Management Evaluation (ME) of Sacramento County’s CalFresh E&T program, which is administered by the Sacramento County Department of Human Assistance (DHA).

An entrance conference was held on September 8, 2020. Due to travel restrictions as a result of COVID-19, the review was conducted remotely over three days with the following entities: Sacramento County DHA, St. John’s Program for Real Change (SJP) and the Sacramento Regional Conservation Corps (SRCC). This report is based on file reviews and interviews with members of the Sacramento County DHA, SJP, and SRCC.



An exit conference was held on September 10, 2020 to provide a summary of the review and to discuss anticipated highlights, observations, and findings.

The following table identifies CDSS review team members:

Name	Title	Organization
Muranda Sams	Staff Services Manager	CDSS
Sarah Turner	Section Chief	CDSS
Jennifer Fuls	Policy Analyst	CDSS
Michael Xiong	Policy Analyst	CDSS

The following table identifies DHA agency staff in attendance:

Name	Title	Organization
Angelica Atkinson	Administrative Services Officer II	DHA
JoAnn Castillo	Accounting Manager	DHA
Michael Clevenger	Program Manager	DHA
Linh Do	CalFresh Program Specialist	DHA
Kathy Gaines-Le	Program Planner	DHA
Kristin Gibbons	Division Manager	DHA
Maria Lucia Gonzales	Chief of Finance	DHA
Sarah Gruber	Human Services Supervisor	DHA
Nancy Lee	Accounting Manager	DHA
Eva Masegian	CalWIN Program Specialist	DHA
Elizabeth Oakland	General Assistance Program Specialist	DHA
Adenike (Nikki) Sowunmi	Accounting Manager	DHA

Objective

The objective of the CalFresh E&T ME was to determine Sacramento County's compliance with CalFresh E&T policies and regulations, and the approved CalFresh E&T Annual Plan, identify and document effective practices that could be helpful to other CalFresh E&T programs, identify technical assistance needs and provide an opportunity for feedback to the CDSS on areas for continuous improvement.

Scope

The CalFresh E&T ME focused on Sacramento County's approved Federal Fiscal Year (FFY) 2019 CalFresh E&T Annual Plan, overall program operations, and regulatory compliance, including fiscal management. The CDSS review team also interviewed members of Sacramento County,



SJP and SRCC staff to better understand overall program operations, ensure compliance, conduct case reviews, and review fiscal practices.

In addition, the CDSS reviewed Sacramento County’s data collection and validation methodologies for the *Non-Assistance CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWDs), and CalFresh Employment and Training (E&T) Program Quarterly Statistical Report (STAT 47)* and the *Annual CalFresh E&T Outcome Metrics Report*.

Methodology

The CalFresh E&T ME was conducted in accordance with Federal Nutrition Services (FNS) and Supplemental Nutrition Assistance Program (SNAP) E&T ME Guidance and utilized procedures and requirements set forth in the SNAP ME review guide for CalFresh E&T MEs.

Specific information gathering practices used during the CalFresh E&T ME include:

Interviews

The CDSS review team conducted interviews with Sacramento County DHA, SJP, and SRCC staff. The questions specifically addressed CalFresh E&T components as specified in the FFY 2019 CalFresh E&T Annual Plan, program compliance, fiscal compliance, data trends, and validation methodologies.

The following table identifies staff interviewees:

Name	Title	Organization
Paula Birdsong	Executive Director	SRCC
Anastasiya Hernandez	Clinician	SJP
Tasha DeLeon Lee	Clinical Director	SJP
Norma Naylor	Director of Corps-member Development	SRCC
Paulette Petty	Human Services Supervisor	DHA
Alvin Prasad	Human Services Specialist	DHA
Scot Smith	Data Integrity Specialist	SRCC

Policy and Training Materials Review

Prior to the ME, the CDSS review team requested various CalFresh E&T policy and training materials. The purpose of the policy and training materials review was to identify program and policy practices in place relative to compliance, as well as to determine how staff are instructed and trained.

The table below identifies the documents requested by the CDSS review team prior to the CalFresh ME that were used as part of this review.



Item Requested	Item Received
County handbook, certification manual training material, or other instructional material	<ul style="list-style-type: none"> • CalFresh Employment and Training (CFET)/General Assistance Training and Employment (GATE) document • How to Add a New Participant in CFET Web App • How to Add a Concurrent Component Program to a Participant in CFET Web App • How to Update a Participant in CFET Web App • Work Registration and Exemptions for CalFresh Program
Copies of notices provided to participants	<ul style="list-style-type: none"> • General Assistance (GA) Program Services Assessment Questionnaire • GA Referral • Supervised Job Search Appointment Letter • Job Club Appointment Letter • Get Help Finding a Job While Saving Money document • Job Search Form • CFET Services Funding Information • CalFresh E&T Providers • CalFresh Referral to DHA • CalFresh Referral to CFET Provider • CalFresh E&T Assessment
Documents used to construct the STAT 47 and Annual Participant Outcome Report, including instructions used to identify and county work registrants	<ul style="list-style-type: none"> • E&T National Outcome Metrics Reporting: Data Definitions, Format/Data Validation Checklist, FAQ and Data Submission Process • STAT 47 – Quarterly Report procedures • CalWIN Business Intelligence STAT 47 Reports
List of CalFresh E&T participants <ul style="list-style-type: none"> • County List • SJS List • SRCC List 	<ul style="list-style-type: none"> • County List of GA Participants • SJP FY 18-19 Participants spreadsheet • SRCC FY 18-19 Participants spreadsheet
Documentation of billing for all reimbursements and all source financial	<ul style="list-style-type: none"> • May 2019 Participants document • Bus Ticket Expenditures Report • CFET General Ledger Report May 2019



Item Requested	Item Received
documentation for the month of May 2019	<ul style="list-style-type: none"> • SRCC General Ledger
Copies of contracts between the county and CalFresh E&T partners including partner budget documentation; partner budget narrative; cost allocation plan between county and partners	<ul style="list-style-type: none"> • 2017-2018 Per-Participant Costs • SJP Employment Training Cost Per Participant 2018 • SRCC Fully Executed Contract • Supervised Job Search (SJS) Fully Executed Contract
County monitoring/ ME review information for CalFresh E&T partners, including the monitoring/review schedule, tools and reports	<ul style="list-style-type: none"> • Draft Letter: Results of Cost Settlement and Contract Monitoring for VOA 30-19 • County Audit/review information for CalFresh E&T partner(s) • Letter: CFET Programmatic Monitoring May 2020 • Sacramento County CFET Programmatic Monitoring for SJP

Case File Review

The CDSS review team selected 22 FFY 2019 case files selected at random to determine compliance. The team utilized a case file review protocol to ensure each case file was reviewed in a consistent manner and that all areas of federal requirements were reviewed. The purpose of the case file review was to determine whether Sacramento County and its partners maintain case files in compliance with federal program requirements.

Fiscal Policy and Document Review

The CDSS review team reviewed fiscal policies and documentation from Sacramento County and sub-recipients for FFY 2019. Additionally, the CDSS evaluated fiscal systems in place to ensure fiscal integrity. The purpose of the fiscal policy and document review was to determine if costs charged to CalFresh E&T matched the approved budget and were allowable, reasonable, necessary, and allocable.

2018 Farm Bill Compliance

The CDSS review team assessed Sacramento County's implementation of recently authorized provisions under the Agriculture Improvement Act of 2018.

As required by the 2018 Farm Bill, Sacramento County is administering a Supervised Job Search component for CalFresh E&T participants receiving General Assistance. Sacramento



County provides a three-day workshop on job readiness for CalFresh E&T participants which includes completing job applications, resume writing and mock interviews. Sacramento County further supports CalFresh E&T participants by assigning a Job Coach to meet with the participant on a weekly basis to discuss their job search goals and progress. Sacramento County and its partners are providing case management services as required which includes the development of an Individual Employment Plan (IEP) for each participant, as well as participant progress monitoring.

Program Highlights

One of the main objectives of the CalFresh E&T ME was to identify, describe, and document effective practices that Sacramento County has in place. These best practices may inform future program development across the State. Sacramento County demonstrated well-developed program elements with many successful practices.

Sacramento County has multiple procedures in place to ensure accuracy of the CalFresh E&T participant data for both its county administered and partner programs. Data pulled from CalWIN Business Intelligence Solution (BIS) is reviewed by a senior accountant prior to acceptance. In addition, random case file reviews are performed to ensure accuracy of data and a trend analysis is conducted to detect any anomalies and fluctuations in data. Additionally, Sacramento County has developed a web-based application, known as CFET, where partners are able to input CalFresh E&T components, start dates, end dates and verify CalFresh E&T eligibility.

Sacramento County's partner, SJP, case files were comprehensive and included case management narratives that are exceptionally well-defined, detailed, and easy to follow. In addition to case management services, SJP offers services beyond the scope of CalFresh E&T, including shelter services, parenting classes, and assistance with navigating legal barriers. Effective use of braided funding has led to robust service delivery. The inclusion of on-site childcare reduces the employment barrier and makes participation in CalFresh E&T especially appealing to participants with dependents.

Additionally, CalFresh E&T participants that successfully complete the program at SRCC are often hired as employees with the program. This outcome indicates that CalFresh E&T participants directly benefit from services offered through CalFresh E&T by SRCC, resulting in positive outcomes for program participants.



Observations

Observation #1: Sacramento County is enrolling CalFresh E&T participants in both Supervised Job Search and Unsupervised Job Search components. Unsupervised Job Search was an allowable component during FFY 2019, and therefore not a finding for FFY 2019.

Recommendation #1: Sacramento County, moving forward, must only enroll CalFresh E&T participants in the Supervised Job Search component, in compliance with the 2018 Farm Bill.

Observation #2: Sacramento County has contracted to reimburse its partner, SJP, for CalFresh E&T services based on a six-month time limit, instead of the actual time needed to complete CalFresh E&T components. Interviews with SJP staff reported the actual time needed to complete the components by CalFresh E&T participants ranged from six months to one year.

Recommendation #2: The CDSS recommends that Sacramento County evaluate the actual time needed to complete the CalFresh E&T components with their partners in order to provide all services and capture CalFresh E&T participation appropriately.

Findings and Corrective Actions

Finding #1: Handouts, forms, and informational materials provided to CalFresh E&T participants in Sacramento County are missing the funding statement and the non-discrimination statement.

Citation: FNS Instruction 113-1, Section IX; 2 CFR 414.2(b)

Background: The funding statement is as follows:

This project has been funded at least in part with Federal funds from the United States Department of Agriculture (USDA). The contents of this publication do not necessarily reflect the view or policies of the USDA, nor does mention of the trade names, commercial products, or organizations imply endorsement by the U.S. Government.

For publications with minimal text or limited space, grantees may use one of the following abbreviated statements:

- *Funding provided by USDA.*
- *Funding for research provided by USDA.*
- *Funding for this project was provided by the USDA.*

The nondiscrimination statement is as follows:

In accordance with Federal law and USDA policy, this institution is prohibited from discrimination on the basis of race, color, national origin, sex, age, or disability. To file a



complaint of discrimination, write to USDA, Director, Center for Civil Rights Enforcement, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call (866) 632-9992.

For publications with minimal text or limited space, grantees may use the following abbreviated statement:

- *USDA is an Equal Opportunity Provider, Employer, and Lender.*

Required Corrective Action #1: Sacramento County, as well as its partners, must include both a funding statement and a nondiscrimination statement on all CalFresh E&T materials produced for public information, public education, and/or public distribution.

Finding #2: Sacramento County is not verifying and documenting CalFresh E&T eligibility on a monthly basis as required. Per interviews with DHA staff, verification of CalFresh benefit receipt is only conducted at the time of intake for General Assistance participants enrolled in CalFresh E&T.

Citation: 7 CFR 273.7; FNS E&T Toolkit 2013

Background: Counties must ensure that CalFresh E&T participants are actively receiving CalFresh benefits for each month in which they receive CalFresh E&T services. At minimum, counties must check participants' CalFresh E&T eligibility monthly.

Required Corrective Action #2: Sacramento County must ensure that proper procedures are outlined and followed by staff when validating CalFresh eligibility of participants on a monthly basis as required.

Finding #3: Sacramento County and its partners are not consistently and accurately tracking CalFresh E&T components, start dates, participant progress, and end dates. During the Sacramento County case file review, the CDSS ME review team observed that case files reflected unsuccessful component completion, while case notes indicated successful program completion. SRCC and SJP case files did not include all the components CalFresh E&T participants were enrolled in, and accurate start and end dates were not consistently recorded.

Citation: 7 CFR 275.15; 7 CFR 273.7(c); 7 CFR 272.2(e)

Background: Counties must ensure that CalFresh E&T participation is captured and reported accurately. Correctly identifying components is necessary in order to accurately validate the total number and percentage of participants that completed an Education, Job Search, Work Experience or On-the-Job Training component as required for the CalFresh E&T Annual Report.

Required Corrective Action #3: Sacramento County must develop and implement procedures for county staff and partners to ensure each CalFresh E&T participant case file accurately



indicates the component(s) in which the participant has been enrolled as well as the component(s) start and end date(s).

Open Findings FFY 2018

During the remote visit, the CDSS ME review team addressed the open findings from Sacramento County's FFY 2018 CalFresh E&T ME. The following findings remain open.

Finding #4: The methodology used to establish the cost-per-participant (CPP) rate is not reflective of the actual cost to serve an eligible CalFresh E&T participant. Volunteers of America (VOA) developed a CPP rate for CalFresh E&T participants that was not consistent with CPP rates for non-CalFresh E&T participants receiving the same services.

Required Corrective Action #4: Sacramento County must ensure that partners have a methodology in place that clearly establishes costs according to actual services provided to all individuals participating in CalFresh E&T. A CPP rate can then be developed based on the actual cost of serving eligible participants.

CDSS Final Determination #4: During the FFY 2019 CalFresh E&T ME, the CDSS determined that the CCP rate for Sacramento County's partners was not being reconciled on an annual basis for all partners. In addition, costs were miscategorized as CalFresh E&T participant supportive services instead of training costs. Therefore, this finding remains open and must be addressed by Sacramento County DHA.

Finding #5: Sacramento County DHA reimbursed partner Bach Viet Association (BVA) for CalFresh E&T services without verifying sufficient non-federal funding. BVA used a blend of federal and non-federal funds to seek the 50 percent federal reimbursement to administer CalFresh E&T. CalFresh E&T requires that only non-federal funds be used to seek the 50 percent federal reimbursement.

Required Corrective Action #5: Sacramento County must ensure their partners have adequate non-federal funds to administer CalFresh E&T.

CDSS Final Determination #5: Sacramento County does not currently have a process in place to verify non-federal funding of its partners. Therefore, this finding remains open and must be addressed by Sacramento County DHA.

Closed Findings FFY 2018

During the remote visit, the CDSS ME review team addressed the open findings from Sacramento County's FFY 2018 CalFresh E&T ME. The CDSS ME review team was able to validate and close the findings from FFY 2018 detailed below:



Finding #1: Sacramento County's FFY 2018 CalFresh E&T Annual Plan is not reflective of the actual services provided.

Required Corrective Action #1: Sacramento County must ensure all components listed in the FFY 2020 CalFresh E&T County Plan will be offered to eligible CalFresh E&T participants. Sacramento County will need to remove on-the-job training as a component on the FFY 2020 CalFresh E&T County Plan, if it will not be offered in FFY 2020. Sacramento County will also need to include internships under the Work Experience component, if offered in FFY 2020.

CDSS Final Determination #1: Sacramento County has updated the language in the FFY 2020 CalFresh E&T Plan to reflect actual services provided. Therefore, this finding has been closed.

Finding #2: Sacramento County is not conducting programmatic and fiscal reviews of their CalFresh E&T partner programs.

Required Corrective Action #2: Sacramento County must ensure that programmatic and fiscal reviews of CalFresh E&T partner(s) are conducted at minimum once a year. Sacramento County is required to conduct programmatic and fiscal reviews to ensure that their partner(s) are operating CalFresh E&T in accordance with federal and state policy and regulations.

CDSS Final Determination #2: Sacramento County has provided verification of regular CalFresh E&T partner reviews. Therefore, this finding has been closed.

Finding #3: Costs charged to CalFresh E&T were questionable, unallowable, or unreasonable. Sacramento County reimbursed their partner, VOA, for administrative expenses that included unallowable costs, such as staffing costs not directly tied to the provision of CalFresh E&T and/or its components, including a credit specialist and therapist. In addition, staff time was charged to CalFresh E&T based on projected staffing needs and not actual staff time dedicated to CalFresh E&T.

Required Corrective Action #3: Sacramento County must ensure that they have effective controls in place to determine whether costs are reasonable, necessary, and directly related to the provision of CalFresh E&T prior to providing reimbursements to partners. Sacramento County must develop a mechanism to reconcile staff charges to CalFresh E&T based on actual staff time dedicated to CalFresh E&T.

CDSS Final Determination #3: Sacramento County has begun conducting regular reviews of its partners and reconciling the CCP rates with the actual costs of providing CalFresh E&T services. Therefore, this finding has been closed.

Finding #6: Sacramento County reimbursed BVA for individuals that were enrolled in the Job Retention component without first receiving other employment or training services under



CalFresh E&T. Individuals were enrolled and received participant reimbursements under the Job Retention component when they had not been employed for more than 30 days and without prior enrollment in an allowable CalFresh E&T component.

Required Corrective Action #6: Sacramento County must implement a procedure to ensure that partners are following guidelines in relation to the allowable sequence of services. Individuals must have enrolled in an allowable CalFresh E&T component prior to enrollment in the Job Retention component. Sacramento County must develop controls to ensure partners are not reimbursed for disallowed costs.

CDSS Final Determination #6: Sacramento County no longer partners with BVA to provide CalFresh E&T services. In addition, Sacramento County has notified its other partners regarding eligibility for participant enrollment in the Job Retention component. Therefore, this finding has been closed.

Finding #7: Reimbursement for bus passes were claimed prior to being distributed and tied to an individual participant actively engaged in an allowable CalFresh E&T component.

Required Corrective Action #7: Sacramento County must implement procedures to ensure that participant reimbursements are tied directly to an individual enrolled in an allowable CalFresh E&T component prior to seeking reimbursement. Proper backup documentation must be maintained and available for review for up to three years.

CDSS Final Determination #7: Sacramento County's Regional Transit Authorization form has been modified to ensure that reimbursement is tied directly to individuals enrolled in allowable CalFresh E&T components. Therefore, this finding has been closed.



Corrective Action Plan

As stipulated in 7 CFR 275.16, Sacramento County is required to provide a written response identifying its corrective actions to findings outlined in this ME report. The corrective action plan (CAP) is due within **60 calendar days** after receipt of this ME report. The CAP must address all findings and must show evidence of the following:

- Evaluation of the findings,
- Identification of the root causes of the findings,
- Magnitude and geographic extent of deficiency,
- Determination of the corrective actions necessary to address the root causes and correct the finding in a sustainable manner,
- Identification of the timeframes related to each corrective action (i.e. major milestone dates, target completion date),
- Identification of the county agency staff responsible or the point of contact for each corrective action,
- Basis for management decisions on planning, implementing, and evaluating corrective actions,
- Description of how the county will monitor the corrective action,
- Description of how the county will determine whether the corrective action is successful in addressing the root causes; and
- Documentation/evidence for any corrective action that has been implemented.



Definitions

Closed Finding: A finding in which corrective action has been implemented by the county/state partner and/or validated as corrected by the CDSS.

Corrective Action Plan (CAP): Actions that are proposed or taken by a county to respond to a finding of noncompliance with federal regulations, FNS instruction, and/or policy memoranda. The term "Required Corrective Action" is the element of the ME report that conveys the action(s) that must be taken by the county to correct the noncompliance with federal regulations, FNS instructions, and/or policy memoranda and prescribed by FNS for the county to move into compliance with federal requirements and policy.

Finding: Identification of non-compliance with program regulations, FNS instructions, and/or policy memoranda, and/or other authoritative documents that must be corrected by the county. Each finding is associated with a required corrective action.

ME Report: Formal, comprehensive report of the ME review that typically includes findings, required actions, observations, suggestions and program highlights.

Observation: Identification of a weakness in program operations or management that is not in violation of program regulations, FNS instructions, and/or policy memoranda, and/or authoritative documents.

Open Finding: A finding in which corrective action has not been implemented by the county and/or validated by CDSS.

Repeat Finding: A finding that is identical to a previously cited, closed finding that is discovered at the same county in at least one of the reviews conducted within the continuous six-year period immediately preceding the ME.

Required Corrective Action: A statement in the ME report that conveys the action(s) that must be taken by the county to correct noncompliance with federal regulations, FNS instructions, and/or policy memoranda. Required corrective actions are prescribed by FNS but may have input by the CDSS. The county is required to provide a CAP in response to CDSS' required corrective action. All required corrective actions must be validated by the CDSS to ensure the county has implemented the corrective action and that the corrective action has been addressed prior to closing the applicable finding(s).

Recommendation: A statement of action that should be considered by the county to correct an observation of a weakness.

Human Assistance
Ethan Dye, Acting Director



Branches
Community Services
Customer Service Operations
Finance and Administration

County Veterans Services Office

County of Sacramento

January 8, 2021

Alexis Fernández, Chief
CalFresh and Nutrition Branch
California Department of Social Services
744 P Street
Sacramento, CA 95814

SUBJECT: CalFresh Employment and Training ME Responses

Dear Ms. Fernández:

I am writing to provide a Corrective Action Plan in response to the Federal Fiscal Year 2019 CalFresh Employment and Training (E&T) Management Evaluation (ME) Review that was conducted from September 8, 2020, through September 10, 2020, at the Sacramento County Department of Human Assistance (DHA).

DHA will continue to work with the California Department of Social Services to implement CalFresh E&T rules and regulations with accuracy, consistency and integrity.

If you have any questions concerning the attached responses, please contact Kristin Gibbons, Division Manager, by telephone at (916) 875-8494, or by email at gibbonsk@saccounty.net.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ethan Dye".

Ethan Dye
Acting Director

c: Cherlyn Davis, Deputy Director, Finance and Administration
Deborah Burch, Deputy Director, Community Services and Department Support
Eduardo Ameneyro, Acting Deputy Director, Customer Service Operations
Kristin Gibbons, Division Manager, Community Services, Policy and Training
Maria Lucia Gonzales, Chief, Departmental Administration
Angelica Atkinson, Program Planner, Policy

CalFresh E&T

ME for FFY 2019 – County of Sacramento

Corrective Action Responses – Observations:

Observation #1: Sacramento County is enrolling CalFresh E&T participants in both Supervised Job Search and Unsupervised Job Search components. Unsupervised Job Search was an allowable component during FFY 2019, and therefore not a finding for FFY 2019

Recommendation #1: Sacramento County, moving forward, must only enroll CalFresh E&T participants in the Supervised Job Search component, in compliance with the 2018 Farm Bill.

Response #1:

DHA has communicated to staff that Unsupervised Job Search is no longer an allowable component. Our department has created a report to help identify those participants that were enrolled in Unsupervised Job Search and are making the necessary edits to be in compliance with the 2018 Farm Bill. We will continue to monitor this report in the future to ensure we are in compliance.

Observation #2: Sacramento County has contracted to reimburse its partner, SJP, for CalFresh E&T services based on a six-month time limit, instead of the actual time needed to complete CalFresh E&T components. Interviews with SJP staff reported the actual time needed to complete the components by CalFresh E&T participants ranged from six months to a year.

Recommendation#2: The CDSS recommends that Sacramento County evaluate the actual time needed to complete the CalFresh E&T components with their partners in order to provide all services and capture CalFresh E&T participation appropriately.

Response #2:

DHA no longer has contracts with community partners to provide CFET E&T services. In the future, if we contract with community partners, we will re-evaluate the actual time limit to provide all services needed to complete the CalFresh E&T participation appropriately.

Corrective Action Responses – Findings

Finding #1: Handouts, forms, and informational materials provided to CalFresh E&T participants in Sacramento County are missing the funding statement and the non-discrimination statement.

Required Corrective Action #1: Sacramento County, as well as its partners, must include both a funding statement and a nondiscrimination statement on all CalFresh E&T materials produced for public information, public education, and/or public distribution.

Response #1:

DHA has taken the necessary steps to update all county produced forms and materials provided to CalFresh E&T participants by adding the requested funding and non-discrimination statements. Any handouts, forms, and materials produced and posted on the CDSS website were not altered.

Finding #2: Sacramento County is not verifying and documenting CalFresh E&T eligibility on a monthly basis as required. Per interviews with DHA staff, verification of CalFresh benefit receipt is only conducted at the time of intake for General Assistance participants enrolled in CalFresh E&T.

Required Corrective Action Plan #2: Sacramento County must ensure that procedures are outlined and followed by staff when validating CalFresh eligibility of participants on a monthly basis as required.

Response #2:

DHA will educate staff on the requirement that CalFresh eligibility is verified monthly for CalFresh E&T participants. Our department is developing a report that will validate CalFresh E&T participants are actively receiving CalFresh benefits and will have designated staff monitor this report monitored monthly.

Additional clarification was requested from CDSS on 12/31/20, in regards to the need of “documenting CalFresh E&T eligibility,” to ensure we are in compliance with this process. We are awaiting a response from CDSS.

Finding #3: Sacramento County and its partners are not consistently and accurately tracking CalFresh E&T components, start dates, participant progress, and end dates. During the Sacramento County case file review, the CDSS ME review team observed that case files reflected unsuccessful component completion, while case notes indicated successful program completion. SRCC and SJP case files did not include all the components CalFresh E&T participants enrolled in, and accurate start and end dates were not consistently recorded.

Required Corrective Action #3: Sacramento County must develop and implement procedures for county staff and partners to ensure each CalFresh E&T participant case file accurately indicates the component(s) in which the participant has been enrolled as well as the component(s) start and end date(s).

Response #3:

DHA no longer has contracts with community partners to provide CFET E&T services. In the future, if we contract with community partners, DHA will take the appropriate measures in reviewing case files to ensure partners are in compliance with case management procedures.

Open Findings FFY 2018

Finding #4: The methodology used to establish the cost-per-participant (CPP) rate is not reflective of the actual cost to serve an eligible CalFresh E&T participant. Volunteers of America (VOA) developed a CPP rate for CalFresh E&T participants that was not consistent with CPP rates for non-CalFresh E&T participants receiving the same services.

Required Corrective Action #4: Sacramento County must ensure that partners have a methodology in place that clearly establishes costs according to actual services provided to all individuals participating in CalFresh E&T. A CPP rate can then be developed based on the actual cost of serving eligible participants.

CDSS Final Determination #4: During the FFY 2019 CalFresh E&T ME, the CDSS determined that the CCP rate for Sacramento County's partners was not being reconciled on an annual basis for all partners. In addition, costs were miscategorized as CalFresh E&T participant supportive services instead of training costs. Therefore, this finding remains open and must be addressed by Sacramento County DHA.

Response #4:

DHA concurs with the finding and will ensure that the methodology used to develop cost-per-participant (CPP) rates are based on actual costs of serving program participants. As of September 30, 2020, DHA no longer has any active CFET contracts. DHA will review the CPP rates for all its providers and reconcile the reimbursed costs to actual costs for the 2020 contracts by the end of FFY 2021.