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**GAVIN NEWSOM**  
GOVERNOR

February 6, 2023

Ethan Dye, Director  
Sacramento County Department of Human Assistance  
1825 Bell Street, Suite 200  
Sacramento, CA 95825

RE: California Work Opportunity and Responsibility to Kids (CalWORKs) Eligibility  
Case File Review - Final Summary of Review

Dear Director Dye:

On behalf of the California Department of Social Services (CDSS), I would like to thank you and your staff for participating in the recent CalWORKs Eligibility Case File Review the month of October 2022. A draft Summary of the review was issued by the CDSS on December 19, 2022, and Sacramento County did not dispute the two findings and four observations.

The final Summary of Review is attached and includes the Department's recommendations for corrective action pertaining to the two findings indicated. The CDSS is available to provide technical assistance, including but not limited to providing feedback on current and revised policy documents and assisting with developing training materials. The CDSS appreciates the assistance and cooperation received during the review process.

Please email your corrective action plan to me at [Octavio.Galvan@dss.ca.gov](mailto:Octavio.Galvan@dss.ca.gov) and Angela Scott at [Angela.Scott@dss.ca.gov](mailto:Angela.Scott@dss.ca.gov) no later than Thursday, March 23, 2023.

Please contact me at [Octavio.Galvan@dss.ca.gov](mailto:Octavio.Galvan@dss.ca.gov) if you have any questions regarding the information included in this letter.

Sincerely,

Octavio Galvan, CFR Project Manager  
CalWORKs and Family Resilience Branch

cc: Isabel Zeuthen, Program Specialist  
Logan Przybyla, Supervisor  
Cathi Aurich, Program Manager  
Roselee Ramirez, Division Manager  
Linda Hoang, Admin Service Officer

CalWORKs Eligibility Case File Review Summary  
Sacramento County Health and Human Services Agency  
February 6, 2023

The California Department of Social Services (CDSS) completed a CalWORKs Eligibility Case File Review of Sacramento County during the month of October 2022. The factors reviewed included: citizenship status and residency of the family; composition of the Assistance Unit (AU); child deprivation; family resources and income; and the grant calculation, including recoupment of any applicable overpayments. It also included a review of: cooperation with child support requirements; whether the case had all required documentation on file; if the county assisted the applicant or recipient in obtaining required documentation; and whether clients were given timely and adequate notice with respect to requests for Immediate Need, Homeless Assistance or adverse case actions.

**Citizenship and Residency Status of the Family**

The review team examined whether the AU member was a United States citizen, legal non-citizen, or undocumented non-citizen to determine the citizenship status of AU members. In addition, staff reviewed the type of verification of citizenship status that was on file and assessed if the verification of citizenship status collected by the county was sufficient for eligibility purposes. Further, whether the county collected proof of California residency was reviewed. Staff noted what type of proof the county collected and if the documentation on file was sufficient to verify California residency.

**Findings/Observations:** There were no findings or observations in this area.

**Composition of the AU**

The review team examined the AU inclusion status of all family members, noting if the county determined the family member's inclusion status was mandatory, optional, excluded. Staff also assessed if the county determined the aforementioned status correctly and whether adequate verification of the relationship to each family member and age of each in the AU were on file.

**Findings/Observations:** There were no findings or observations in this area.

**Deprivation and Child Support Requirements**

The review team examined the type of deprivation the county identified for each child in the AU and whether appropriate documentation to support the basis of deprivation was on file. For cases of absent parent deprivation, staff assessed if the appropriate child support referral, noticing requirement and questionnaire was completed. In addition, staff determined whether sanctions and/or penalties related to child support were

assessed when appropriate. For cases of unemployed parent deprivation, staff reviewed whether the principal earner was identified correctly and if the employment hours of the principal earner were under 100 hours in the preceding four weeks.

**Findings/Observations:** There were no findings or observations in this area.

### **Family Resources**

The review team examined the type of resources available to the AU and determined if adequate verification of the resources was on file and if the resource value was determined correctly. Staff also assessed if the family was within the allowable resource limits.

**Findings/Observations:** There were no findings or observations in this area.

### **Family Income**

The review team examined the types and sources of income available to the AU and determined if adequate documentation of the income was on file as well as if the amount of income was correctly determined. Staff also assessed if the applicable income disregards were applied correctly and if the reasonably anticipated income was determined correctly as well as documented in case notes.

**Findings/Observations:** There were no findings or observations in this area.

### **Grant Calculation and Recoupment of Overpayments**

The review team examined the following factors to determine whether or not the grant was calculated correctly: AU size, region, Maximum Aid Payment (MAP), MAP status (exempt or non-exempt), special needs payments (if applicable), and whether or not sanctions or penalties were applied. Staff also reviewed any applicable underpayments or overpayments to determine if the grant was adjusted correctly.

**Findings/Observations:** There were no findings or observations in this area.

### **Required Documentation in Case File**

The review team examined whether or not the SAWS application(s) and corresponding notification of rights and responsibilities was on file for both applications and redeterminations as well as whether the appropriate interview was completed. In addition, staff reviewed whether the SAR 7 was on file for cases in which a semi-annual redetermination was required.

**Findings:** There was one finding in this area.

**Observations:** There were four observations in this area.

Finding #1: Missing Statement of Facts

The CDSS reviewed two cases, one Redetermination and one 3F case, that were missing the Statement of Facts (SOF). Pursuant to the Manual of Policies and Procedures (MPP) Section 40-128.11, the applicant, in support of their application, shall complete, sign, and file with the county the SOF (SAWS 2 Plus) supporting their eligibility for assistance. The statement may be filed with the county at the time of application or at any subsequent time prior to completion of the determination of eligibility. In addition, per MPP Section 40181.1(SAR)(a), the county paying aid shall be responsible for continuing to determine eligibility to ensure payment only to eligible recipients in the correct amount, to assist recipients in meeting their financial and service needs as fully as possible, and to make maximum use of their resources and capabilities. For CalWORKs cases, eligibility shall be established by the use of the SAWS 2 Plus/SOF at the time of application and then at one-year intervals, and also by the SAR 7 and by recipient mid-period reports.

Recommendation: The CDSS recommends Sacramento County conduct training with eligibility staff, as well as ongoing case reviews by supervisors, to ensure that all necessary documentation is signed and in the case file. In addition, the CDSS recommends that Sacramento County review county business practices and procedures related to application/redetermination processes.

Observation #1: Missing Immunization Records

The review team examined one case in which no immunizations were entered, and the CW2209 Immunization Good Cause Request Form was not available in the case record for a child under 6 years of age. It was indicated that the child's immunization records were never collected (no record found in FileNet), nor was there any information in the case comments regarding if immunization was verified via CAIR 2 or if the client requested exemption.

Pursuant to MPP Section 40-105.4(d), verification of immunization is required at the initial application when adding a child under the age of six to the AU, and at redetermination. Verification of immunizations, as defined by the county, must be submitted until the child(ren) completes all age-appropriate immunizations or the child(ren) reaches the age of six. In addition, per MPP Section 40-105.4(e)(3), children under the age of six being added to the AU if applying for CalWORKs and Medi-Cal simultaneously within 30 days of the determination of eligibility for Medi-Cal; or if applying for CalWORKs and already receiving Medi-Cal benefits, within 45 days. Furthermore, per MPP Section 44-105.4(g), if an applicant or recipient fails to submit timely the verification for immunizations for any children under the age of six and no

exemption or good cause exists, then the grant shall be reduced by the amount (MAP) allowed for the needs of the parents or caretaker relatives in the AU.

**Recommendation:** The CDSS recommends Sacramento County provide training to eligibility staff regarding immunization requirements for children under the age of six, including exploring possible immunization exemptions for good cause and applying penalties when appropriate. The CDSS is available to provide any technical assistance the county may need.

Observation #2: Missing CW 2200

In the same case as Observation #1, the reviewer also noted that the required verification request form CW 2200 was missing from the case record. The CW 2200 form should have been issued to request immunization records for the child. The CW 2200 was revised and re-released as a required form in All County Letter (ACL) 14-26. The form is to ensure that all requests for verification from clients stay consistent across the state.

**Recommendation:** The CDSS recommends that Sacramento County increase supervisor reviews of applications and redeterminations to ensure verifications are correctly requested using the CW 2200.

Observation #3: Missing SAWS 2A SAR

The CDSS observed one case where the SAWS 2A SAR Rights and Responsibilities document was missing. Pursuant to MPP Section 40-181.1(e), counties shall give applicants and recipients at the time of application and at least once every 12 months thereafter complete explanations in writing regarding factors which may cause ineligibility, underpayments or overpayments, penalties due to an intentional program violation, and their responsibility to report changes as prescribed by MPP Section 40-105.14. The factors to be explained shall include changes in income and resources, changes in need, etc. These requirements are met when the SAWS 2A SAR is signed by both the applicant/recipient and the eligibility worker, and a completed copy is imaged into the case file.

**Recommendation:** The CDSS recommends that Sacramento County take the necessary steps to ensure a signed SAWS 2A SAR is included in every case file. The county should also review existing county processes and procedures to determine if they need to be changed in the short term before transitioning to the CalSAWS imaging solution. The county is also recommended to inform and propose changes to the CalSAWS imaging solution if they cannot be addressed via county business practices.

#### Observation #4: Missing recording of the SAWS 2 Plus and SAWS 2A SAR

After examination of the cases, the review team found a case in which a recording of the SAWS 2 PLUS and SAWS 2A SAR was missing and could not be located. Per case comments, on September 3, 2021, both forms were telephonically signed. However, the reviewer could not verify the eligibility worker signature for both parents in the home.

Pursuant to MPP section 40-181.1(e), counties shall give applicants and recipients at the time of application and at least once every 12 months thereafter complete explanations in writing regarding factors which may cause ineligibility, underpayments or overpayments, penalties due to an IPV, and their responsibility to report changes as prescribed by Section 40-105.14(SAR) (Applicant and Recipient Responsibility). The factors which are to be explained shall include changes in income and resources, changes in need, etc. These requirements are met by the use of the SAWS 2A SAR in CalWORKs. The county is to have the applicant/recipient sign and date the acknowledgment of receipt at the bottom of the notice, provide a signed copy to the applicant/recipient, and retain a copy in the case file. The eligibility worker's signature certifies that the applicant has been informed of his or her rights and responsibilities.

Recommendation: The CDSS recommends the county review the documents which require a signature at application and redetermination, followed by training of eligibility staff to complete the signature requirements during the application and redetermination process. For cases in which a telephonic signature was collected, Sacramento County must ensure that a copy of the recording is saved within the case record.

#### Timely and Adequate Notice

The review team examined whether timely and adequate notice was provided for discontinued cases or grant decreases. In addition, staff assessed whether the county acted correctly and timely upon voluntary mid-period reports, mandatory mid-period reports and whether the county completed all required county initiated mid-period actions appropriately.

**Findings:** There was one finding in this area.

**Observations:** There were no observations in this area.

#### Finding #1: Missing Discontinuance Notice of Action

The review team examined one case in which there was no Notice of Action (NOA) for a discontinued case. Case notes indicated that CalWORKs aid would be discontinued effective November 2021 without meeting the timely and adequate noticing requirements. Case records show that a CalWORKs NOA was never sent to the recipient.

In accordance with MPP section 22-072.1(c), counties shall mail timely and adequate notice to the AU in all instances where the county action would result in a discontinuance, termination, suspension, cancellation, or decrease of aid. Timely is defined in MPP Section 22-001(t)(1) as a written notice that is mailed to the person affected at least 10 days before the effective date of the action. Adequate is defined in MPP Section 22-001(a)(1) as a written notice informing the claimant of the action the county intends to take, the reasons for the intended action, the specific regulations supporting such action, and an explanation of the claimant's right to request a state hearing, and for the CalWORKs program, if the county action is upheld, that the aid pending must be repaid if the AU was overpaid.

The CDSS recommends Sacramento County review current processes to ensure CalWORKs recipients receive timely and adequate notice before aid is decreased or discontinued. The CDSS also recommends Sacramento County conduct training with eligibility staff, as well as ongoing case reviews by supervisors to ensure staff issue notices correctly, timely, and adequately. The CDSS is available to provide any technical assistance Sacramento County may need.



## County of Sacramento

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March 29, 2023

Lisa Witchey, Chief  
CalWORKs and Family Resilience Branch  
California Department of Social Services  
744 P Street  
Sacramento, CA 95814

**SUBJECT:** CalWORKs Eligibility Case File Review Action Plan

Dear Ms. Witchey:

We are writing in response to your recent correspondence, dated February 6, 2023, conveying the results of the CalWORKs Eligibility Case File Review that took place in October 2022. Sacramento County continuously strives to improve services to our customers and to meet administration expectations set forth by the California Department of Social Services (CDSS).

The review identified one Finding and four Observations within the area of Required Documentation in Case File, as well as one Finding in the area of Timely and Adequate Notice. CDSS made recommendations to provide trainings to eligibility staff in the relevant areas and to increase supervisory review. Recommendations also included a review of existing county processes.

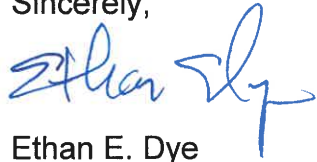
In response to the findings and observations from the Case File Review noted in your letter, the Department of Human Assistance (DHA) has set forth the following action plan:

1. Corrective action measures have been implemented to address the inclusion of required documentation in case files. This includes timely and adequate notices.
2. Supervisors have been directed to review the findings and observations at supervisor forums and unit meetings. Supervisors will focus their case reviews on the cited elements.
3. CalWORKs Program Specialists will provide mandatory training for CalWORKs supervisors and eligibility staff addressing required documentation, immunization records and timely notices. The Policy team will continue to support line staff and supervisors with understanding and policy retention.



DHA is committed to partnering with CDSS to improve our case actions and program access. If you have any questions or concerns, you may contact Yevgeniy Kurdyumov, Program Planner, by telephone at (916) 875-3516, or by email at [kurdyumovy@saccounty.gov](mailto:kurdyumovy@saccounty.gov).

Sincerely,



Ethan E. Dye  
Director

c: Cristina Vazquez, Deputy Director  
Roselee Ramirez, Division Manager  
Cathi Aurich, Program Manager  
Yevgeniy Kurdyumov, Program Planner  
Isabel Zeuthen, Program Specialist  
Octavio Galvan, Project Manager

## **Required Documentation in Case File**

### **Findings:**

1. Two cases reviewed were missing Statement of Facts.

#### **Corrective Action:**

DHA is reviewing all current processes in preparation for migration to CalSAWS, and will ensure all processes related to application/redetermination are clearly defined. DHA is developing targeted online training for eligibility staff and supervisors to address the cited errors. DHA plans to conduct the training in May of 2023. Supervisors will focus on the cited elements while conducting their full case reviews to ensure that all required forms are in a case file. In addition, DHA is implementing new Supervisor Case Review tasks in April 2023, leveraging our new enhanced case review system in SMART (Service Management and Reporting Tool) to review applications/renewals processed by staff and ensure all necessary documentation is in the case file.

### **Observations:**

1. Missing Immunization records. No CW2209 Immunization Good Cause Request Form found in case record for a child under 6 years of age. No immunization documentation found in FileNet. No any information in the case comments if immunization was verified via CAIR 2 or if the client requested exemption.

#### **Corrective Action:**

DHA is reviewing current processes regarding immunization requirements for children under the age of six, including possible immunization exemptions for good cause and applying penalties when appropriate, and ensuring that those requirements will be addressed prior to migration to CalSAWS. Please note Sacramento County does not use The California Immunization Registry (CAIR2) system.

The Policy Team is currently developing an online targeted training for eligibility staff and supervisors addressing cited errors including immunization records topic. The training is planned for May of 2023.

2. Missing required CW 2200 form to request immunization records for the child addressed in Observation # 1 above.

**Corrective Action:**

DHA will continue leveraging Supervisor tasks reviews to review applications/renewals processed by staff and ensure necessary documentation is in the case file, including CW 2200 when requesting verifications. DHA is actively addressing and training staff on some errors across all programs. The Policy Team works collaboratively with operational supervisors to ensure they have the program tools necessary to support their staff. In addition, extra measures taken after the cited case from 2021 was reviewed included a targeted training conducted by the Case Review and Training Team. Addressing the CW2200 requirements took place in July of 2022. The training was mandatory for all staff including CalWORKs. Our standard practice after each training is to complete targeted case reviews on the training that was provided. Case reviews include individual feedback to the worker who created the error, ensuring the error is corrected timely and provides an additional learning opportunity for the worker to prevent the same error in the future.

3. Missing SAWS 2A SAR Rights and Responsibilities. The requirements are met when the SAWS 2A SAR is signed by both the applicant/recipient and eligibility worker, and a completed copy is imaged into the case file.

**Corrective Action:**

DHA is reviewing all current processes in preparation for migration to CalSAWS and will ensure all processes related to application/redetermination are clearly defined. An online targeted training for eligibility staff and supervisors addressing cited errors is being developed. CalWORKs Policy Team plans to conduct the training in May of 2023. Additionally, supervisors have been directed to focus their reviews on the cited elements and ensure that all required forms are in case file. They will continue reviewing the work of their staff utilizing the SMART system.

4. Missing recording of the SAWS2 Plus and SAWS 2A SAR and could not be located. Per case comments, both forms were telephonically signed.

**Corrective Action:**

DHA is reviewing all current processes in preparation for migration to CalSAWS and will ensure all processes related to application/redetermination are clearly defined. An online targeted training for eligibility staff and supervisors addressing cited errors is being developed. The training is planned for May of 2023. Similar to other observations and action plan, supervisors will be using SMART tasks to review the work of their staff and ensure that all necessary documentation is in the case file including recordings and telephonic signatures. That includes a designated SMART task called Telephonic Signature Review. In addition, supervisors have been

directed to focus their ongoing reviews on the cited elements and ensure that all required forms and corresponding telephonic signatures are in case file.

### **Timely and Adequate Notice**

#### **Findings:**

1. Missing Discontinuance Notice of Action. Case notes indicated that CalWORKs would be discontinued effective November 2021 without meeting the timely and adequate noticing requirements.

#### **Corrective Action:**

DHA is reviewing all current processes in preparation for migration to CalSAWS and will ensure all processes related to application/redetermination are clearly defined. An online mandatory training for eligibility staff and supervisors addressing cited errors is being developed. The training is planned for May of 2023. Similar to the aforementioned actions for the cited elements, supervisors will continue focusing their reviews on the findings to verify timely and adequate notices are in the case file.