

# CALIFORNIA HEALTH & HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



July 17, 2025

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

SUBJECT: FEDERAL FISCAL YEAR 2025 CORRECTIVE ACTION PLAN FOR

CALFRESH EMPLOYMENT AND TRAINING MANAGEMENT

**EVALUATION** 

# Dear Ethan Dye:

This letter confirms the California Department of Social Services (CDSS) received the Sacramento County Department of Human Assistance (DHA) Corrective Action Plan (CAP) dated April 3, 2025. The CDSS received supporting documentation on June 25, 2025. The CAP and supporting documentation addressed the following findings from the Federal Fiscal Year (FFY) 2025 CalFresh Employment and Training (E&T) Management Evaluation (ME) Report.

**Finding #1:** Sacramento County DHA CalFresh eligibility staff reported that an oral explanation of the CalFresh work rules was not provided to all work registrants and ABAWDs as required by statute. CalFresh eligibility staff were unclear about when or if CalFresh recipients are being provided the CalFresh Notice of Work Rules (CF 886) form.

**Citation:** 7 CFR 273.7(c)(1)(ii); 7 CFR 273.7(c)(2); All County Letter (ACL) No. 21-48; ACL No. 24-42

The Sacramento County DHA conducted refresher training for Eligibility Workers to reinforce staff understanding of the CalFresh work rules. The training emphasized the requirement to provide an oral explanation of the work rules to all work registrants, verify the CF 886 is properly generated and delivered during intake and renewal, and

document the interaction in the case journal. The CDSS verified the corrective action and has closed this finding.

**Finding #2:** The Sacramento County DHA did not screen CalFresh applicants and or/recipients at certification/recertification to determine if a referral to participate in CalFresh E&T was appropriate. The Sacramento County DHA did not have a process to review/approve referral requests from E&T providers and confirm the appropriateness of the individual's referral to the E&T program.

Citation: 7 CFR 273.7(c)(2); ACL No. 22-34

The Sacramento County DHA updated its program materials and conducted training for Eligibility Workers to ensure accurate screening and referral processes, including documentation in the individual's case record. The CDSS confirmed Sacramento County DHA has developed county-specific criteria for referral to E&T and implemented a referral process. The CDSS has closed this finding.

**Finding #3:** The Sacramento County DHA did not provide participant reimbursements to eligible CalFresh E&T participants as required. Participants were provided with a monthly bus pass, which was deducted from the participant's GA benefit. Other reasonable and necessary supportive services, including ancillary services, were available per Sacramento County's FFY 2024 CalFresh E&T Plan but were not offered by caseworkers.

Citation: 2 CFR 273.7(d)(4); ACL 20-125

The Sacramento County DHA amended its FFY 2025 CalFresh E&T Annual Plan to remove all county-administered E&T components and services. The CalFresh E&T program is offered exclusively through CDSS state partners, the Center for Employment Opportunities (CEO) and Fresh Success, which offer participant reimbursements. The CDSS has closed this finding.

**Finding #4:** The Sacramento County DHA case files lacked documentation to adequately demonstrate that E&T participants received meaningful case management services, including, but not limited to, individualized service plans, progress monitoring, or coordination with service providers.

Citation: 7 CFR 273.7(c)(2); 7 CFR 273.7(e)(1); ACL No. 22-99

The Sacramento County DHA amended its FFY 2025 CalFresh E&T Annual Plan to remove all county-administered E&T components and services. The CalFresh E&T program is offered exclusively through CDSS state partners, CEO and Fresh Success. The CDSS has closed this finding.

Finding #5: The Sacramento County DHA did not provide supervised job search (SJS) participants with direct supervision by skilled staff with meaningful guidance and support, including monthly check-ins or follow-ups as required. The Sacramento County DHA SJS component consisted of an initial phone call assessment and job search logs submitted by E&T participants. The Sacramento County DHA had no minimum monthly hour requirement.

Citation: 7 CFR 273.7(e)(2); 7 CFR 273.7(e)(2)(i); ACL No. 22-99

The Sacramento County DHA amended its FFY 2025 CalFresh E&T Annual Plan to remove all county-administered E&T components and services. The CalFresh E&T program is offered exclusively through CDSS state partners, CEO and Fresh Success. The CDSS has closed this finding.

Finding #6: The Sacramento County DHA charged the CalFresh E&T grant for administrative costs for supervised job search and case management services in circumstances where there was insufficient documentation to support services were provided.

**Citation:** 7 CFR 273.7(e)(1); 7 CFR 273.7(c)(4); 2 CFR 200.403; 2 CFR 200.404; 2 CFR 200.306(b)(3)

The Sacramento County DHA amended its FFY 2025 CalFresh E&T Annual Plan to remove all county-administered E&T components and services. The CalFresh E&T program is offered exclusively through CDSS state partners, CEO and Fresh Success. The CDSS has closed this finding.

We appreciate your help in promptly addressing these findings through the CAP submission. All FFY 2025 findings have been addressed and closed. If you have any questions, contact Ashley Eck at Ashley. Eck@dss.ca.gov or CalFreshEandTME@dss.ca.gov.

Sincerely,

SHARISSE KEMP, Chief

**Employment and Resource Nutrition Bureau** 

California Department of Social Services

Cc: Yevgeniy Kurdyumov, Program Planner

Signature: Sharisse K (p (Jul 17, 5025 08:31 PDT)

Email: Sharisse.Kemp@dss.ca.gov

Title: SSM III

Company: STATE OF CALIFORNIA DEPARTMENT OF SOCIAL



# CALIFORNIA HEALTH & HUMAN SERVICES AGENCY DEPARTMENT OF SOCIAL SERVICES

744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



February 6, 2025

Ethan Dye, Director Sacramento County Department of Human Assistance 1825 Bell Street, Suite 200 Sacramento, CA 95825-1020

SUBJECT: CALFRESH EMPLOYMENT AND TRAINING MANAGEMENT

**EVALUATION REPORT** 

Dear Ethan Dye:

We thank you and your staff for participating and helping us complete the Federal Fiscal Year 2025 CalFresh Employment and Training Management Evaluation (ME), from December 10 through December 11, 2024. The ME report includes findings, observations, and program highlights from the California Department of Social Services (CDSS). We want to additionally thank Yevgeniy Kurdyumov for coordinating the review.

The CDSS requests a Corrective Action Plan (CAP) by April 7, 2025 addressing the findings in this report. To complete the CAP, please follow the directions in the ME report. The CDSS requires verification, such as policy memos, invoices, and written procedures to close the finding(s) in the ME report.

If you have any questions or need additional information, please contact Ashley Eck at <u>Ashley.Eck@dss.ca.gov</u> or <u>CalFreshEandTME@dss.ca.gov</u>.

Sincerely,

Sarah Turner

SARAH TURNER, Chief CalFresh Employment and Training California Department of Social Services

**Attachments** 

cc: Yevgeniy Kurdyumov, Human Services Program Manager



# CALFRESH EMPLOYMENT AND TRAINING MANAGEMENT EVALUATION REPORT FOR SACRAMENTO COUNTY

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## INTRODUCTION

From December 10 through December 11, 2024, the California Department of Social Services (CDSS) conducted a CalFresh Employment and Training (E&T) Management Evaluation (ME) of the CalFresh E&T program, administered by the Sacramento County Department of Human Assistance (DHA).

An entrance conference was held on December 10, 2024. The review was conducted at the following locations:



# Sacramento County DHA

- 1825 Bell Street Suite 200 Sacramento, CA 95825
- 1725 28<sup>th</sup> Street Sacramento, CA 95816

This report is based on program file reviews, fiscal document reviews, and interviews with Sacramento County DHA staff members.

An exit conference was held on December 11, 2024, to summarize the review and to discuss any additional documentation needed, anticipated findings, observations, and program highlights.

The following table names the CDSS ME team members:

Name	Title	Organization
Ashley Eck	Policy Analyst	CDSS
Ranjana Kohli	Policy Analyst	CDSS
Sylia Rios	Policy Analyst	CDSS
Muranda Sams	Manager	CDSS
Sarah Turner	Chief	CDSS

The following table names the Sacramento County DHA staff in attendance:

Name	Title	Organization
Eduardo Ameneyro	Deputy Director	DHA
JoAnn Castillo	Senior Accounting Manager	DHA
Linh Do	Program Specialist (CalFresh)	DHA
Ethan Dye	Director	DHA
Julie Field	Division Manager	DHA
Kristin Gibbons	Division Manager	DHA
Maria Lucia Gonzales	Chief of Finance Management	DHA
Yevgeniy Kurdyumov	Program Planner	DHA



Name	Title	Organization
Selina Lei	Accounting Manager	DHA
Renee Lowder	Deputy Director	DHA
Eva Masegian	Program Specialist	DHA
Tihane Meza	Program Manager	DHA
Elizabeth Oakland	Program Specialist	DHA
Jasmin Perrigo	Acting Program Manager	DHA
Paulette Petty	Human Services Supervisor	DHA
Rynal Prasad	Accounting Manager	DHA
Roselee Ramirez	Division Manager	DHA
Mary Sabillo	Division Manager	DHA
Sou Saelee	Program Manager	DHA
Jennifer Saetern	Division Manager	DHA
Tamara Tyukayev	Division Manager	DHA
Cristina Vazquez	Deputy Director	DHA
Jennie Ward	Human Services Supervisor	DHA

## **OBJECTIVE**

The objective of the CalFresh E&T ME was to:

- Determine compliance with CalFresh E&T regulations;
- Confirm adherence to the CalFresh E&T Annual Plan;
- Identify and document effective practices in place;
- 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 the Federal Fiscal Year (FFY) 2025 CalFresh E&T Annual Plan, overall program operations, regulatory compliance, and fiscal management.



## **METHODOLOGY**

The CalFresh E&T ME was conducted following the United States Department of Agriculture, Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) E&T ME Guidance, and used procedures and requirements outlined in the SNAP ME Review Guide for E&T MEs.

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

## **Interviews**

The CDSS ME team interviewed the Sacramento County DHA staff. The questions addressed CalFresh E&T components in the CalFresh E&T Annual Plan, program and fiscal compliance, work registration screening processes, data trends, and validation methodologies.

The following table names staff interviewees:

Name	Title	Organization
Veronica Duenas	Administrative Services Officer I	DHA
Camille Fuhrmann	Senior Accountant	DHA
Stacy Hernandez	Human Services Supervisor	DHA
Crystal Jacques	Administrative Services Officer II	DHA
Yevgeniy Kurdyumov	Program Planner	DHA
Selina Lei	Accounting Manager	DHA
Eva Masegian	Program Specialist	DHA
Paulette Petty	Human Services Supervisor	DHA
Alvin Prasad	Human Services Specialist	DHA
Rynal Prasad	Accounting Manager	DHA
Sandy Yang	Human Services Specialist	DHA
Ruby Young	Human Services Specialist	DHA



# **Policy and Training Materials Review**

The CDSS requested CalFresh E&T policies and training materials before the ME. The policy and training materials review verified program and policy practices in place and confirmed how staff were instructed and trained on the CalFresh E&T program.

The following table names policy and training documents reviewed by the CDSS ME team before the ME:

Itom Doguested	Itom Descived
Item Requested	Item Received
E&T Handbook, certification manual, training material, or other instructional material provided to staff	<ul> <li>Supportive Service Reimbursements         Program Document</li> <li>CalFresh E&amp;T Providers PowerPoint         Presentation</li> <li>CalFresh E&amp;T Providers and Activities         Reference Sheet</li> <li>Dispositioning CalFresh E&amp;T Activities         in CalSAWS</li> <li>Supportive Services for CalFresh E&amp;T         in CalSAWS</li> </ul>
Training and instructional materials about work registration procedures	<ul> <li>CalFresh Work Rules (CF 886) and Oral Script (SC 1022-34F) All Staff Email</li> <li>CalFresh Work Rules Oral Script</li> <li>Work Registration and Exemptions for CalFresh Program Document</li> <li>Work Registration and ABAWD PowerPoint Presentation</li> <li>ABAWD Program Document</li> </ul>
Copies of notices provided to CalFresh E&T participants	<ul> <li>General Assistance Program Services         Assessment Questionnaire</li> <li>General Assistance Strategic Training         and Education for Prevention Planning         Referral Form</li> <li>Supportive Services Approval Form</li> <li>Supportive Services Denial Forms</li> <li>Employment Services Plan</li> <li>Job Search Form</li> <li>Option to Participate</li> <li>CalFresh E&amp;T Funding Information</li> </ul>



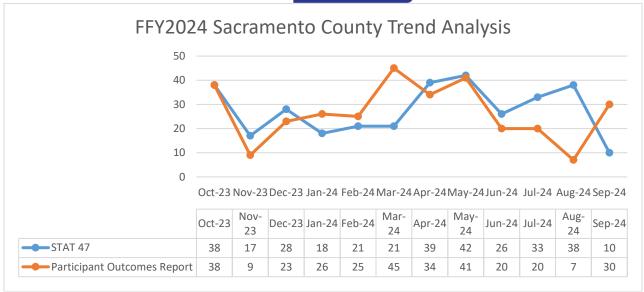
Item Requested	Item Received
	<ul> <li>CalFresh Referral to E&amp;T Provider</li> <li>CalFresh E&amp;T Assessment Form</li> </ul>
Documents used to construct the STAT 47 and Participant Outcomes Report, including instructions used to identify and count work registrants	<ul> <li>CalSAWS Design Document – System updates to support STAT 47 to match CalFresh E&amp;T rule ACL 22-67</li> <li>STAT 47 Quarterly Report Procedures</li> </ul>
CalFresh E&T organizational charts	<ul> <li>High-Level DHA Organizational Chart</li> <li>E&amp;T Organizational Chart</li> </ul>
Lists of CalFresh E&T participants	E&T Participants FFY 2024
Documentation of billing for all reimbursements and all source financial documentation for January 2024	<ul> <li>Fund and Cost Centers Matrix</li> <li>E&amp;T Certification Letter</li> <li>E&amp;T Time Study</li> <li>County Expense Claim</li> </ul>
General ledger and chart of accounts for FFY 2024, Quarter 2	General Ledger Fiscal Year 23-24

## **Data Review**

The CDSS reviewed the data collection and validation methodologies for the "CalFresh Work Registrants, Able-Bodied Adults Without Dependents (ABAWD), CalFresh Employment and Training (E&T) Program Quarterly Statistical Report" (STAT 47), and the "CalFresh E&T Participant Outcomes Report," formerly known as the Annual Report.

Trend analysis graph:





## **Case File Review**

The CDSS ME team selected and reviewed 10 program files. The team used a case file review protocol to ensure each case file was reviewed consistently and met all areas of federal requirements. The program file review determined how case files were maintained in compliance with federal program requirements.

# **Civil Rights Review**

The CDSS ME team reviewed Sacramento County DHA's compliance with civil rights public notification as required for all programs and services funded by the FNS. The civil rights review ensured applicants, participants, and potentially eligible persons were informed of the program's availability, rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a complaint.

The CDSS ME team confirmed all handouts, forms, and informational materials provided to CalFresh E&T participants contained the FNS funding and nondiscrimination statements according to FNS Instruction 113-1, Section IX and Title 2 Code of Federal Regulations (CFR) 415.2(b).

## **Fiscal Review**

The CDSS ME team reviewed fiscal policies, documentation, and procedures in place. The fiscal review determined if costs charged to CalFresh E&T were allowable, reasonable, necessary, and allocable following 7 CFR 273.7 and 2 CFR 200.403.

The CDSS ME team reviewed fiscal policies and accounting records, including time records, to ensure documentation was maintained in a manner that permitted



verification of all costs charged to the CalFresh E&T program. The CDSS ME team evaluated the fiscal systems and safeguards in place to ensure fiscal integrity. Additionally, the CDSS ME team evaluated the methodology used for allocating costs to the CalFresh E&T program following federal guidance.

# **Work Registration Review**

The CDSS ME team reviewed procedures related to work registration. The work registration review assessed whether work registration status was completed and documented for CalFresh recipients at the time of certification.

# **Program Overview**

The Sacramento County DHA's internal CalFresh E&T program was administered to the General Assistance (GA) population in FFY 2025. The components offered to GA participants were Supervised Job Search and Education. The Sacramento County DHA also partnered with CDSS state partners Fresh Success and the Center for Employment Opportunities (CEO) to provide CalFresh E&T services to students and the formerly incarcerated.

## **PROGRAM HIGHLIGHTS**

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

The Sacramento County DHA's General Assistance Training and Employment (GATE) program staff were passionate about finding ways to better engage with Sacramento County's GA population experiencing high barriers. Additionally, Sacramento County DHA's partnerships with CEO and Fresh Success have allowed the county to reach additional target groups.

#### **OBSERVATIONS**

**Observation #1:** The Sacramento County DHA did not reconcile E&T component data reported on the STAT 47 with component data reported on the Participant Outcomes Report for accuracy.

**Recommendation #1:** The CDSS recommends that the Sacramento County DHA implement standardized processes to reconcile E&T component data reported on the STAT 47 and Participant Outcomes Reports.

#### FINDINGS AND CORRECTIVE ACTIONS



**Finding #1:** Sacramento County DHA CalFresh eligibility staff reported that an oral explanation of the CalFresh work rules was not provided to all work registrants and ABAWDs as required by statute. CalFresh eligibility staff were unclear about when or if CalFresh recipients are being provided the CalFresh Notice of Work Rules (CF 886) form.

**Citation:** <u>7 CFR 273.7(c)(1)(ii)</u>; <u>7 CFR 273.7(c)(2)</u>; <u>All County Letter (ACL) No. 21-48</u>; <u>ACL No. 24-42</u>

**Background:** The county must provide written notice CF 886 and oral explanation of the applicable CalFresh work rules to all households where at least one member is subject to a CalFresh work rule and document the action in the individual's case file.

**Required Corrective Action #1:** The Sacramento County DHA must ensure CalFresh eligibility staff provide the CF 886 written notice and oral explanation of the applicable CalFresh work rules to all households where at least one member is subject to a CalFresh work rule.

**Finding #2:** The Sacramento County DHA did not screen CalFresh applicants and or/recipients at certification/recertification to determine if a referral to participate in CalFresh E&T was appropriate. The Sacramento County DHA did not have a process to review/approve referral requests from E&T providers and confirm the appropriateness of the individual's referral to the E&T program.

Citation: 7 CFR 273.7(c)(2); ACL No. 22-34

**Background:** The county is responsible for screening each work registrant to determine whether it is appropriate based on county-specific criteria to refer the individual to the E&T program. If an individual was not screened and referred to the CalFresh E&T program by the county during the certification process, but later learns about a CalFresh E&T provider program on their own, the individual or E&T provider may ask the county to complete a screening and referral to the CalFresh E&T program.

**Required Corrective Action #2:** The Sacramento County DHA must ensure all the following requirements are met:

- Eligibility workers fulfill their responsibility to appropriately screen and refer CalFresh applicants/recipients to the E&T program based on county-specific criteria;
- 2. Referrals are documented in the individual's case record; and
- 3. The county establishes written processes/procedures for direct referrals and referral requests and trains staff accordingly.



**Finding #3:** The Sacramento County DHA did not provide participant reimbursements to eligible CalFresh E&T participants as required. Participants were provided with a monthly bus pass, which was deducted from the participant's GA benefit. Other reasonable and necessary supportive services, including ancillary services, were available per Sacramento County's FFY 2024 CalFresh E&T Plan but were not offered by caseworkers.

**Citation:** 2 CFR 273.7(d)(4); ACL 20-125

**Background:** The county must provide participant reimbursements to CalFresh E&T participants for expenses that are reasonable, necessary, and directly related to participation in the E&T program. The county must inform each E&T participant that allowable expenses will be reimbursed upon presentation of appropriate documentation. Reimbursable costs may include, but are not limited to, dependent care costs, transportation, and ancillary services, such as work uniforms, personal safety items or other necessary equipment, and books or training manuals.

Required Corrective Action #3: The Sacramento County DHA must inform and provide participant reimbursements directly related to participation in the CalFresh E&T program including dependent care costs, transportation, and ancillary services, such as work uniforms, personal safety items or other necessary equipment, and books or training manuals. The Sacramento County DHA must develop a written policy and practice to issue allowable supportive services to eligible CalFresh E&T participants enrolled in components. In addition, the Sacramento County DHA must provide staff with adequate training and resources on allowable supportive services.

**Finding #4:** The Sacramento County DHA case files lacked documentation to adequately demonstrate that E&T participants received meaningful case management services, including, but not limited to, individualized service plans, progress monitoring, or coordination with service providers.

Citation: 7 CFR 273.7(c)(2); 7 CFR 273.7(e)(1); ACL No. 22-99

**Background:** CalFresh E&T participants must receive both case management services and at least one E&T component while participating in E&T. Case management services include, but are not limited to, comprehensive intake assessments, individualized service plans, progress monitoring, or coordination with service providers and must be provided to all E&T participants. Progress monitoring includes tracking participant progress in the form of, at minimum, monthly case notes.

**Required Corrective Action #4:** The Sacramento County DHA must provide case management services to CalFresh E&T participants. CalFresh E&T participants must receive at minimum monthly meaningful contact as part of case management services to ensure E&T participants progress in the program. The Sacramento County DHA is



required to document all case management services provided to the participant in the case file.

**Finding #5:** The Sacramento County DHA did not provide supervised job search (SJS) participants with direct supervision by skilled staff with meaningful guidance and support, including monthly check-ins or follow-ups as required. The Sacramento County DHA SJS component consisted of an initial phone call assessment and job search logs submitted by E&T participants. The Sacramento County DHA had no minimum monthly hour requirement.

Citation: 7 CFR 273.7(e)(2); 7 CFR 273.7(e)(2)(i); ACL No. 22-99

**Background:** The county must ensure supervision of CalFresh E&T participants enrolled in the SJS component is provided by skilled staff, either remotely or in person, who provide meaningful guidance and support with at least monthly check-ins. The participant's level of effort should be comparable to spending approximately 12 hours per month for two months making job contacts.

**Required Corrective Action #5:** The Sacramento County DHA must ensure participants engaged in the SJS component receive direct supervision and meaningful guidance by skilled staff with at least monthly check-ins or follow-ups. All participation must be tracked and monitored to support the success of the E&T participant.

**Finding #6:** The Sacramento County DHA charged the CalFresh E&T grant for administrative costs for supervised job search and case management services in circumstances where there was insufficient documentation to support services were provided.

**Citation:** 7 CFR 273.7(e)(1); 7 CFR 273.7(c)(4); 2 CFR 200.403; 2 CFR 200.404; 2 CFR 200.306(b)(3)

**Background:** The county must design and operate a CalFresh E&T program comprised of case management services and at least one qualifying E&T component. The county can only use CalFresh E&T funds for expenses directly related to allowable components, activities, and participant reimbursements.

**Required Corrective Action #6:** To support approval of Sacramento County's FFY 2026 CalFresh E&T Plan and budget, the CDSS requires documentation of the following:

- Reasonable assurance that charges to the CalFresh E&T grant are for allowable expenses directly related to components, activities, and participant reimbursements; and
- Documentation of staff instruction regarding how to appropriately charge time to the CalFresh E&T grant.



#### CORRECTIVE ACTION PLAN

As required in <u>7 CFR 275.16</u>, a written response identifying the corrective actions to the findings outlined in this ME report is needed. 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 finding;
- Identification of the root cause of the finding;
- Size and geographic extent of deficiency;
- Determination of the corrective action necessary to address the root cause and sustainably correct the finding;
- Identification of the timeframes related to each corrective action (i.e. major milestone dates, target completion date);
- Identification of the staff responsible or the point of contact for each corrective action:
- Basis for the development of the plan, implementation, and evaluation of the corrective action;
- Description of how the entity reviewed will monitor the corrective action;
- Description of how the entity reviewed 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 and validated as corrected by the CDSS.

**Finding:** Identification of non-compliance with program regulations, FNS instructions, policy memoranda, or other authoritative documents that must be corrected. Each finding is associated with needed corrective action.

**Observation:** A weakness or opportunity identified for improvement in program operations or management.

**Open Finding:** A finding in which corrective action has either not been implemented or validated by the CDSS.

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

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

**Required Corrective Action:** A statement in the ME report that conveys the action(s) that must be taken to correct noncompliance with federal regulations, FNS instructions, or policy memoranda. The FNS may have input on required corrective actions taken. All corrective actions must be confirmed by the CDSS before closing the applicable finding(s).

Resources: E&T Handbook, CalFresh E&T website



#### **Branches**

Program Support and Planning Customer Service Operations Finance, Administration and Budget

County Veterans Services Office

# **County of Sacramento**

April 3, 2025

Sarah Turner Chief, CalFresh Employment and Training California Department of Social Services 744 P Street Sacramento, CA 95814

SUBJECT: Sacramento County FFY 2025 CalFresh CAP

Dear Sarah Turner:

The County of Sacramento, Department of Human Assistance (DHA), is writing to provide our Corrective Action Plan (CAP) for the CalFresh Employment and Training (E&T) Management Evaluation (ME) for Federal Fiscal Year (FFY) 2025, which was conducted from December 10, 2024, through December 11, 2024.

In response to the findings from the ME, noted in your letter, dated February 6, 2025, DHA has set forth the following action plan:

- DHA will enhance participant communication and documentation, ensuring that all work registrants and Able-Bodied Adults Without Dependents receive both written and oral explanations of CalFresh work rules. Staff will be retrained on proper notification procedures and referral processes.
- 2. With the shift of CalFresh E&T services to external providers, DHA will no longer handle participants' case management and provide E&T services internally. State partners will oversee case management, and DHA will work on strengthening the partnership.
- DHA will update its procedures, train designated staff on accurate time reporting, and work closely with state partners to ensure that all related E&T expenses and activities are properly documented, preventing unverified administrative charges.

Sacramento County FFY 2025 CalFresh CAP April 3, 2025 Page **2** of **2** 

DHA is committed to partnering with the California Department of Social Services to improve service delivery and align our operations with state requirements. If you have any questions or concerns, you may contact Yevgeniy Kurdyumov, Program Planner, by telephone at (916) 875-3516 or via email at kurdyumovy@saccounty.gov.

Sincerely.

Ethan E. Dye

c: Renee Lowder, Deputy Director
Tamara Tyukayev, Division Manager
Roselee Ramirez, Division Manager
Cathi Aurich, Program Manager
Sou Saelee, Program Manager
Yevgeniy Kurdyumov, Program Planner

Enclosure
Sacramento County FFY 2025 CFET ME CAP
April 3, 2025
Page 1 of 4

# <u>CalFresh Employment and Training Management Evaluation - Corrective Action</u> Plan

# Finding #1:

Sacramento County DHA CalFresh eligibility staff reported that an oral explanation of the CalFresh work rules was not provided to all work registrants and ABAWDs as required by statute. CalFresh eligibility staff were unclear about when or if CalFresh recipients are being provided the CalFresh Notice of Work Rules (CF 886) form.

# **Required Corrective Action #1:**

The Sacramento County DHA must ensure CalFresh eligibility staff provide the CF 886 written notice and oral explanation of the applicable CalFresh work rules to all households where at least one member is subject to a CalFresh work rule.

## Response #1:

DHA acknowledges this finding. The CF 886 form was automated in CalSAWS in October 2024, and the system now generates and sends this form automatically during intake and renewal. To ensure compliance, DHA will conduct refresher training between May and June 2025 to reinforce staff understanding of the CalFresh work rules. This training will emphasize the requirement to provide an oral explanation of the work rules to all work registrants and ABAWDs and verify that the CF 886 is properly generated and delivered during intake and renewal, including adding a journal note stating they provided oral explanation of the CalFresh work rules.

**Finding #2:** The Sacramento County DHA did not screen CalFresh applicants and or/recipients at certification/recertification to determine if a referral to participate in CalFresh E&T was appropriate. The Sacramento County DHA did not have a process to review/approve referral requests from E&T providers and confirm the appropriateness of the individual's referral to the E&T program.

## **Required Corrective Action #2:**

The Sacramento County DHA must ensure all the following requirements are met:

- Eligibility workers fulfill their responsibility to appropriately screen and refer CalFresh applicants/recipients to the E&T program based on county-specific criteria;
- 2. Referrals are documented in the individual's case record; and
- 3. The county establishes written processes/procedures for direct referrals and referral requests and trains staff accordingly.

## Response #2:

The E&T referral process was offered to those customers whose CalFresh program was linked to General Assistance. Due to operational changes within the General Assistance division that oversees the CFET program, DHA discontinued its internal provision of E&T services effective January 27, 2025. Sacramento County continues to collaborate

Enclosure Sacramento County FFY 2025 CFET ME CAP April 7, 2025 Page **2** of **4** 

with state partners and community-based organizations (CBOs) that provide E&T services to CalFresh recipients. The county is currently amending the CFET Plan to reflect these structural changes. Upon approval of the new revised plan DHA will implement the following corrective actions:

- 1. DHA will conduct targeted training for eligibility staff to ensure accurate screening and referral processes for external CFET providers.
- 2. Additionally, staff will be trained to document all screening and referral activities in household case records.
- 3. To enhance consistency, DHA will review and update program procedures, providing staff with screening templates, scripts, and standardized journal entries to ensure thorough documentation of referrals.

# Finding #3:

The Sacramento County DHA did not provide participant reimbursements to eligible CalFresh E&T participants as required. Participants were provided with a monthly bus pass, which was deducted from the participant's GA benefit. Other reasonable and necessary supportive services, including ancillary services, were available per Sacramento County's FFY 2024 CalFresh E&T Plan but were not offered by caseworkers.

## **Required Corrective Action #3:**

The Sacramento County DHA must inform and provide participant reimbursements directly related to participation in the CalFresh E&T program including dependent care costs, transportation, and ancillary services, such as work uniforms, personal safety items or other necessary equipment, and books or training manuals. The Sacramento County DHA must develop a written policy and practice to issue allowable supportive services to eligible CalFresh E&T participants enrolled in components. In addition, the Sacramento County DHA must provide staff with adequate training and resources on allowable supportive services.

# Response #3:

Under the current FFY 2025 CFET Annual Plan approved by CDSS, Sacramento County does not reimburse transportation costs through CFET funds but rather through GA funds. Other supportive services were not consistently offered, likely due to insufficient communication with eligibility staff regarding approved reimbursement categories and amounts.

Sacramento County is in the process of amending the FFY 2025 CFET Plan to remove internal reimbursement expenses. Moving forward, all participant reimbursements will be managed by state partners. DHA will ensure staff are informed of these changes and that applicants are appropriately directed to state partners for eligible reimbursements.

## Finding #4:

The Sacramento County DHA case files lacked documentation to adequately

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demonstrate that E&T participants received meaningful case management services, including, but not limited to, individualized service plans, progress monitoring, or coordination with service providers.

# **Required Corrective Action #4:**

The Sacramento County DHA must provide case management services to CalFresh E&T participants. CalFresh E&T participants must receive at minimum monthly meaningful contact as part of case management services to ensure E&T participants progress in the program. The Sacramento County DHA is required to document all case management services provided to the participant in the case file.

# Response #4:

Many CFET participants, particularly those within the GA population, face significant barriers such as disabilities, mental health challenges, lack of transportation, homelessness, and inconsistent contact information, making follow-up and engagement difficult. While DHA staff attempt outreach, many participants remain unresponsive or do not attend scheduled assessments. Additionally, many participants initially agree to CFET activities but later opt out, preferring to seek employment independently.

Previously, assessments were tracked in the ancillary system; however, participation was inconsistent. Since Sacramento County will no longer provide CFET services internally, all case management services will now be conducted and documented by state partners. DHA will ensure that relevant case information is communicated to staff by June 2025.

## Finding #5:

The Sacramento County DHA did not provide supervised job search (SJS) participants with direct supervision by skilled staff with meaningful guidance and support, including monthly check-ins or follow-ups as required. The Sacramento County DHA SJS component consisted of an initial phone call assessment and job search logs submitted by E&T participants. The Sacramento County DHA had no minimum monthly hour requirement.

## **Required Corrective Action #5:**

The Sacramento County DHA must ensure participants engaged in the SJS component receive direct supervision and meaningful guidance by skilled staff with at least monthly check-ins or follow-ups. All participation must be tracked and monitored to support the success of the E&T participant.

# Response #5:

DHA only registered CFET participants for supervised job search if they opted in. However, many participants later declined participation, preferring to conduct their job search independently.

As Sacramento County transitions out of providing CFET services internally, the SJS component will now be managed solely by state partners. These partners will continue

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to oversee supervision, check-ins, and participation tracking to ensure program compliance and participant success.

# Finding #6:

The Sacramento County DHA charged the CalFresh E&T grant for administrative costs for supervised job search and case management services in circumstances where there was insufficient documentation to support services were provided.

## **Required Corrective Action #6:**

To support approval of Sacramento County's FFY 2026 CalFresh E&T Plan and budget, the CDSS requires documentation of the following:

- Reasonable assurance that charges to the CalFresh E&T grant are for allowable expenses directly related to components, activities, and participant reimbursements; and
- Documentation of staff instruction regarding how to appropriately charge time to the CalFresh E&T grant.

## Response #6:

Sacramento County previously tracked CFET participant assessments using the SMART system, which operated separately from CalSAWS. Many participants failed to attend scheduled assessments or later opted out of CFET activities, making it challenging to document services effectively.

With the department transitioning from providing direct CFET services, documentation and expenditure tracking for the CFET grant will now be managed by state partners. Under the amended CFET Plan pending approval, DHA will designate staff to work with state partners on related employment activities, and eligibility status.