CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • *www.cdss.ca.gov*

JENNIFER TROIA
DIRECTOR

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GOVERNOR

August XX 2025

Ethan Dye, Director of
Sacramento County Human Assistance
1825 Bell Street Ste. 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), we would like to thank you and your staff for participating in the recent CalWORKs Eligibility Case File Review. A Draft Summary of the review was issued by the CDSS on June 19, 2025 and Sacramento County did not dispute the two Findings identified.

The attached Final Summary details the seven Observations and two Findings identified during our review and includes the Department's recommendations for corrective action pertaining to the Finding(s) 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 no later than **29 September 2025.**

The purpose of these reviews is to assess Temporary Assistance for Needy Families (TANF) eligibility determinations, redeterminations, and terminations of benefits made by counties, as well as other special tests and provisions, and to monitor the implementation of recent CalWORKs eligibility policy changes. Additionally, the CDSS review team identifies practices that are effective, those in need of improvement, and any state policies that may require further development or clarification.

Please contact me at Beverly.Jones@dss.ca.gov or the Case File Review team at calworkscfr@dss.ca.gov if you have any questions regarding the information included in this letter.

In partnership,

CalWORKs Eligibility Case File Reviews
Early Engagement Section
Early Engagement & Eligibility Bureau
CalWORKs & Family Resilience Branch
Program Assessment Section
California Department of Social Services

cc:

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CalWORKs Eligibility Case File Review Summary
Sacramento County Human Assistance
August 14, 2025,

The California Department of Social Services (CDSS) completed a CalWORKs Eligibility Case File Review of Sacramento County during the month of May 2025. The factors reviewed include: Citizenship status and residency of the family; composition of the Assistance Unit (AU); child deprivation; family resources and income; and grant calculation, including recoupment of any applicable overpayments. Also included is a review of cooperation with child support requirements, whether the case had all required documentation on file, whether 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 whether the verification of citizenship status collected by the county was sufficient for eligibility purposes. Further, whether the county collected proof of California residency was also reviewed. Staff noted what type of proof the county collected and if the documentation on file was sufficient to verify California residency.

Findings: There were no Findings in this area.
Observations: There were no Observations in this area.

Composition of the Assistance Unit (AU)

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

Findings: There were no Findings in this area.
Observations: There were no 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 whether the appropriate child support referral, noticing requirement, and questionnaire were 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: There were no Findings in this area.
Observations: There were no Observations in this area.

Family Resources

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

Findings: There were no Findings in this area.
Observations: There were no Observations in this area.

Family Income

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

Findings: There were no Findings in this area.
Observations: There were no 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 sanctions or penalties were applied. Staff also reviewed any applicable underpayments or overpayments to determine whether the grant was adjusted correctly.

Findings: There were no Findings in this area.
Observations: There were no Observations in this area.

Required Documentation in Case File

The review team examined whether the SAWS application(s) and corresponding notification of rights and responsibilities were 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 were two findings in this area.
Observations: There were seven observations in this area.

Finding #1: No Photo ID on File

The CDSS review team identified one redetermination case with a missing photo ID for one of the parents. Pursuant to Senate Bill (SB) 89, the use of the Statewide Fingerprint Imaging System (SFIS) as a requirement for issuing CalWORKs benefits was discontinued effective July 1, 2018. Counties are to stop using SFIS for all cases. Instead, applicants must verify their identity in person with a form of photo ID to complete the application and eligibility determination process. Assembly Bill (AB) 135 further extended flexibilities by allowing applicants to present their photo ID virtually (see ACL 20-134 for guidance). For applicants, photo identification is a condition of eligibility. Failure to provide the necessary identification will result in ineligibility for the entire AU (MPP Section 40-105.3).

Per MPP Section 40-105.343, when acceptable photo identification does not exist, any applicant's sworn statement under penalty of perjury regarding identity shall be considered sufficient. However, the applicant must present their photo identification in person within 15 working days for benefits to be continued.

Recommendation:

The CDSS recommends that Sacramento County review all policy materials regarding identity verification requirements and issue a policy reminder to remind staff to have participants present a photo ID (in person or virtually) if a copy of their photo ID is not already on file.

Finding #2: No Immunization Record on File Resulting in Incorrect Grant

The CDSS review team identified one redetermination case with a missing immunization record for a child under the age of six.

According to MPP Section 40-105, all applicants and recipients must verify immunization for all children under the age of six in the AU at the time of application, when adding a child under the age of six, and at redetermination. Applicants and recipients shall provide verification of immunization within 45 days of redetermination of eligibility.

Furthermore, per MPP Section 44-105.4(g), if an applicant or recipient fails to submit timely verification for immunizations for any children under the age of six and no exemption or good cause exists, the grant shall be reduced by the amount allowed for the needs of the parents or caretaker relatives in the AU.

Additionally, ACL17-87 reminds CWDs that when requesting verifications, the CW 2200 Request for Verifications form must be used. Additionally, when requesting verifications for immunizations, the CWD must provide the client with the CW 2209 Immunization Good Cause Request Form.

In this case, Sacramento County requested some documents using the CW 2200 but did not request the immunization record for the child in mention There was no evidence if the CW 2209 form was sent or if the recipient was given the correct timeframe of 45 days to provide verification of immunization for the child per MPP section 40-105(e)(3). Therefore, a penalty should not have been imposed. The child should have been included in the AU for eligibility determination and grant purposes.

<u>Recommendation:</u>

CDSS recommends Sacramento County review all review all policy and training materials related to CalWORKs immunization requirements and revise as necessary. The CDSS also recommends the CWD provide training to staff regarding immunization requirements for children under the age of six, including possible immunization exemptions or good cause, to ensure they understand when immunization records need to be requested and are applying good cause or penalties when appropriate.

The CDSS is available to provide any technical assistance Sacramento County may need, including but not limited to providing feedback on current and revised immunization policy documents and assisting with developing training materials.

<u>Observation #1: Incomplete SAWS 2 Plus Statement of Facts (SOF)</u>

The CDSS identified four redetermination cases, one application case, and one K1 case in which several questions on the SAWS 2 PLUS/Statement of Facts (SOF) were left unanswered and therefore did not accurately reflect the recipient’s circumstances.

MPP Section 40-181.217 outlines all the requirements for a complete redetermination, application and K1 cases, which states that a complete redetermination, application and K1 cases requires sufficient responses to all questions on the SAWS 2 Plus, and the information provided together with the submitted evidence must be sufficient for the county to determine eligibility and grant amounts. Additionally, information reported on the SAWS 2 Plus/Statement of Facts must be consistent with other information that the county has verified to be accurate. To meet these requirements, the SAWS 2 Plus must be completed to its entirety with accurate and up-to-date information.

Recommendation:

The CDSS recommends Sacramento County issue a policy reminder and develop the best practice procedure for CWD eligibility staff to review the SAWS 2 Plus after completing the eligibility interview to ensure that all questions are appropriately completed. If there is a data entry issue with the CalSAWS system that is causing answers to be left out on the SAWS 2 Plus, the CDSS suggests Sacramento County work with CalSAWS to determine an automation fix.

Observation #2 No SAWS 2A SAR on File or the Electronic Signature

The CDSS observed three cases where a signed SAWS 2A SAR/SOF was missing from case files or had been telephonically signed, but there was no record in the Electronic Signature Screen that one was captured for that form. A copy of a signed SAWS 2A SAR was also not found in the distributed documents.

Pursuant to MPP Section 40-181.1(e), CWDs must 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). The factors to be explained include changes in income and resources, as well as changes in need. These requirements are met by the use of the SAWS 2A SAR in CalWORKs, and the signature and date block serve as county certification that the applicant or recipient has been informed of their rights and responsibilities. ACL 13-96 instructs CWDs to review the SAWS 2A SAR with the applicant/recipient and obtain signatures from the applicant/recipient(s), in addition to the CWD eligibility worker to ensure the applicant/recipient has been advised and understands their rights and responsibilities and CalWORKs rules and penalties.

Recommendation:

The CDSS recommends Sacramento County review ACL 13-96 with eligibility staff and increase supervisory reviews at application/redetermination. The SAWS 2 Plus/SOF must be completed during the interview to ensure questions are answered correctly and properly. If the county does not have the capability to capture an electronic signature, the SOF must be sent to the applicant/recipient for review and signature to ensure that answers to all questions have been captured correctly.

Observation #3 CW 80 Form not in the File

The CDSS identified one application case in which a copy of the Self-Certification Form for Motor Vehicles (CW 80) form (which is a required form) was not maintained in the electronic imaging or case file documentation. Pursuant to MPP section 42-215.412, applicants and recipients shall be allowed to self-certify the Fair Market Value (FMV) of all motor vehicles in the AU, as well as any encumbrances. To self-certify a motor vehicle's FMV and encumbrances, applicants and recipients will be required to complete and submit to the CWD a Self-Certification Form for Motor Vehicles (CW 80 form) or complete the motor vehicle section of the appropriate statement of facts. MPP section 42-215.413, If the motor vehicle is exempt, as provided in section 42-215.431, the client is not required to declare the FMV of the motor vehicle or amount owed for the vehicle.

Recommendation:

The CDSS recommends that Sacramento County include a signed CW 80 in every case file as appropriate and review their electronic imaging and filing process to ensure adequate case documentation is maintained in the electronic storage system.

The CDSS further recommends the county review ACL 18-76 and ACIN 1-42-23 to ensure staff are trained on the interim CW 80 requirement pending the revision of the SAWS 2 Plus Appendix E.

Observation #4: Inadequate Immediate Need Denial Notice of Action (NOA)

The CDSS identified one application case where the county denied the application for immediate need (IN), dated September 4, 2024. The IN denial notice of action (NOA) stated that the applicant was not eligible for an IN payment because "they didn't have VARIABLE".

According to MPP Section 40-129.531, when eligibility for IN does not exist, the IN payment request shall be denied, and the applicant shall be notified in writing in accordance with MPP Section 22-071(g). Adequate Notice 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, an explanation of the claimant's right to request a state hearing, and if appropriate, the circumstances under which aid will be continued if a hearing is requested, and for the CalWORKs program, if the county action is upheld, that the aid pending must be repaid.

The IN denial issued for this application case does not meet the requirements in MPP Sections 22-071 and 22-001.

Recommendation:

The CDSS recommends Sacramento County review current processes to ensure applicants are notified adequately, in accordance with MPP section 40-129.531, and to review training materials relevant to IN, including the IN interview and the timely determination of IN requests. The CDSS also recommends that the county conduct training with eligibility staff, as well as ongoing case reviews by supervisors, to ensure staff correctly determine IN. The CDSS is available to provide any technical assistance the county may need, including, but not limited to, providing feedback on current and revised IN policy documents and assisting with the development of training materials.

Observation #5: Overpayment NOA was Issued Inadequately

The CDSS identified one K1 Case with an overpayment where they did not receive adequate notice. The Notice of Change NOA dated 5/6/24 for an administrative error overpayment does not give a reason for the error. NOA states that the “administrative error overpayment was due to “VARIABLE.”. The county must provide a valid reason for the overpayment. Therefore, this overpayment NOA reason is not acceptable.

Under Manual of Policies and Procedures (MPP) Section 22-071.1(d), adequate notice must be provided to recipients when the county demands repayment of overpayment. Adequate Notice 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, an explanation of the claimant's right to request a state hearing, and if appropriate, the circumstances under which aid will be continued if a hearing is requested, and for the CalWORKs program, if the county action is upheld, that the aid pending must be repaid

Recommendation: The CDSS recommends that Sacramento County remind its staff to review its existing written policies on overpayments and to ensure a timely and adequate NOA is provided to recipients

Observation #6 School Attendance Verification

The CDSS identified one 3F case, the school attendance verification and the expected graduation date (EGD) was requested for the 15-year-old and 16-year-old, were not deemed chronic truants for pregnant/parenting. School attendance should not be requested for children or teens unless it is applicable per the regulations/statute. Counties can request verification of attendance and EGD for 17-year-olds.

Per All County Letter (ACL) 15-22, County Welfare Departments (CWD) are no longer permitted to ask applicants and recipients to prove verification of school attendance with the exception of pregnant or parenting teens for the purposes of Cal-Learn. A child shall be presumed to be attending school unless they have been deemed a chronic truant pursuant to Section 48263.6 of the Education Code.

If the CWD learns that a child aged 16 years of age or older has not been attending school and is deemed a chronic truant pursuant to Section 48263.6 of the Education Code, the needs of the child shall not be considered in computing the grant of the family after following the steps outlined in ACL 15-22 and 15-22E.

In this case, the CWD requested a school attendance verification for a 16-year-old who was not deemed or reported a chronic truant, and pressure was put on the caretaker relative/parent with the suggestion that there would be a discontinuance for failure to complete the RRR if evidence was not submitted (the case never discontinued and no penalty was ever applied as verification was received).

Recommendation:

The CDSS recommends Sacramento County review ACL 15-22 and 15-22E to ensure that staff are trained on the school attendance requirement and increase supervisory reviews to ensure proper compliance. It is further recommended that Sacramento County review all cases with school attendance penalties applied for compliance. The CDSS has agreed to work with Sacramento County to update it
School Attendance policies.

Observation #7: Missing Telephonic Signature for CW 2.1NA & Missing Updated CW 2.1 Q

The CDSS identified one redetermination case, where the CW 2.1 NA was signed with a telephonic signature. The absent parent information was provided after the participant's ICT to Sacramento County in 2018. A CW 2200 was sent out at that time, requesting updated forms, and no action was taken. The CDSS review team was unable to find a written copy of the telephonically signed CW 2.1 NA or updated CW 2.1Q. Additionally, a copy was not located in the printed correspondence, which would suffice in proving that the copy was sent to the client. A copy was also not located in the imaging system, where it would have been uploaded to images, nor were there case notes indicating that a copy of the forms was sent out to the client.

Pursuant to 7 U.S.C. § 2020(e)(2)(C), one of the requirements for a system by which an applicant may sign an application through a recorded verbal assent over the telephone is to promptly provide to the household member a written copy of the completed application, with instructions for a simple procedure for correcting any errors or omissions (please see All County Information Notice (ACIN) I-60-03 for further guidance on this matter).

In addition, ACL 17-57 states that for all households that file a non-paper application, recertification application, or periodic report with electronic signature, counties must promptly provide a written copy of the information given over the phone, along with simple instructions for correcting errors or omissions so that the applicant may review the information that has been recorded electronically and make any necessary changes within 10 business days. The copy of documents must contain the information used to determine eligibility and benefit level. In most instances, a copy of the application, recertification application, or periodic report submitted will suffice.

Recommendation:

The CDSS recommends Sacramento County review ACL 17-57 and ACIN 1-60-13 with staff. In addition, the CDSS recommends that Sacramento County provide training to staff on the correct procedure for implementing telephonic signatures, ensuring that copies of all telephonically signed documents are sent to clients for review in a timely manner.

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 were no Findings in this area.
Observations: There were no Observations in this area.

Human Assistance
Ethan E. Dye, Director

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

County Veterans Services Office

County of Sacramento

September 29, 2025

Beverly Jones
CalWORKs and Family Resilience Branch
California Department of Social Services
744 P Street
Sacramento, CA 95814

SUBJECT: Sacramento County CalWORKs Eligibility Case File Review Action Plan

Dear Ms. Jones:

We are writing in response to your recent correspondence, dated August 14, 2025, conveying the results of the CalWORKs Eligibility Case File Review that took place in May 2025. 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 two findings and seven observations within the area of Required Documentation in Case Files. CDSS made recommendations to provide training to eligibility staff in the relevant areas and to increase supervisory review. Recommendations also included a review of existing county processes, as well as a reminder to staff to review existing written policies.

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 will be implemented to address the inclusion of required documentation in case files.
2. Supervisors will be directed to review the findings and observations at supervisor forums and unit meetings. Line supervisors, Case Review Training supervisors, and Quality Review staff will focus their case reviews on the cited elements.
3. CalWORKs Program Specialists will create mandatory training for CalWORKs supervisors and eligibility staff addressing the required documentation. 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 Isabel Zeuthen, Human Services Program Specialist, by telephone at (916) 875-3579, or by email at zeutheni@saccounty.gov.

Sincerely,

Ethan E. Dye

c: Eduardo Ameneyro, Deputy Director
Roselee Ramirez, Division Manager
Cathi Aurich, Program Manager
Isabel Zeuthen, Human Services Program Specialist
Laura Hodges, Human Services Program Specialist
Catherine Bui, Human Services Supervisor

Required Documentation in Case File

Findings: There were two findings in this area.

Observations: There were seven observations in this area.

Finding #1 – No Photo ID on File

One redetermination case was identified as having a missing photo ID for one of the parents.

Corrective Action:

Sacramento County, Department of Human Assistance (DHA), has reviewed all policy materials regarding identity verification requirements and can confirm that they are updated and posted for all CalWORKs staff to review. DHA will issue a policy reminder to staff that CalWORKs participants must present a photo ID, in person, if a copy of their photo ID is not already on file. In addition, DHA will develop training for eligibility staff and supervisors to address this finding. The training would be tentatively conducted between the months of October 2025 and January 2026.

DHA will continue to confirm that photo IDs are on file for all aided adults during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

Finding #2 – No Immunization Record on File Resulting in Incorrect Grant

One redetermination case had a missing immunization record for a child under the age of six.

Corrective Action:

DHA has reviewed all policy materials regarding CalWORKs immunization requirements and can confirm that they are updated and posted for all CalWORKs staff to review. DHA will issue a policy reminder to staff regarding immunization requirements for children under the age of six, including possible immunization exemptions or good cause, to ensure they understand when to request immunization records and how to apply good cause or penalties appropriately. In addition, DHA will develop training for eligibility staff and supervisors to address this finding. The training would be tentatively conducted between the months of October 2025 and January 2026.

DHA will continue to confirm that immunization records were collected and reviewed for children under the age of six during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff. The application of possible immunization exemptions or good cause when a family cannot produce such records will also continue to be part of DHA's internal case reviews.

Observation #1 – Incomplete SAWS 2 Plus/Statement of Facts (SOF)

Four redetermination cases, one application case, and one K1 case were identified with several questions on the SAWS 2 Plus/Statement of Facts (SOF) that were left unanswered and therefore did not accurately reflect the recipient's circumstances.

Corrective Action:

DHA will issue a policy reminder for staff to review the SAWS 2 Plus form after completing the eligibility interview to ensure that all questions are appropriately answered. In addition, DHA will develop training for eligibility staff and supervisors covering best practices for data collection in the CalSAWS system during the interview process. This training will specifically instruct staff to answer all Root Questions and review/edit the SOF as necessary to ensure completion. The training would be tentatively conducted between the months of October 2025 through January 2026.

During internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff, DHA will continue to ensure the proper completion of all required questions listed on the SAWS 2 Plus form.

Observation #2 – No SAWS 2A SAR on File or the Electronic Signature

Three cases were identified as missing a signed SAWS 2A SAR. In some instances, staff indicated the form had been telephonically signed, but there was no record in the CalSAWS Electronic Signature Document Detail screen that one was captured for that form.

Corrective Action:

DHA has reviewed all policy materials regarding SAWS 2A SAR completion and signature requirements during eligibility interviews. In addition, DHA can confirm that policy materials regarding the SAWS 2A SAR are updated and posted for all CalWORKs eligibility to review.

DHA will develop training for eligibility staff and supervisors to address signature requirements for the SAWS 2A SAR. An instructional guide will also be created and posted with step-by-step instructions for CalSAWS system data collection when indicating that the applicant/recipient has been informed of their rights and responsibilities and collecting an electronic signature. The training will also remind staff that reviewing the SAWS 2A SAR ensures the customer has been advised and understands their rights and responsibilities and CalWORKs rules and penalties. The training would be tentatively conducted between the months of October 2025 through January 2026.

Observation #3 – CW 80 Form not in the File

One application case did not have a copy of the Self-Certification Form for Motor Vehicles (CW 80) (which is a required form) in the electronic imaging or case file documentation.

Corrective Action:

DHA has reviewed all policy materials regarding the use of the required CW 80 form for customers to self-certify the Fair Market Value (FMV) of all motor vehicles including any encumbrances. All program documents and guidance to staff are updated and posted for all CalWORKs staff to review. DHA will issue a policy reminder to staff that any CalWORKs families that report a new vehicle at SAR 7, application, or re-evaluation are provided with a CW 80 to complete and submit. Staff will also be instructed to maintain the CW 80 form in the case file. In addition, DHA will develop training for eligibility staff and supervisors to address this observation. The training would be tentatively conducted between the months of October 2025 through January 2026.

DHA will continue to ensure the proper use and maintenance of the CW 80 form during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

Observation #4 – Inadequate Immediate Need Denial Notice of Action (NOA)

One application case was denied Immediate Need (IN) with a Notice of Action (NOA) stating that the applicant was not eligible for an IN payment because of a "VARIABLE" reason. A proper reason for the denial was not included in the NOA.

Corrective Action:

DHA will review its current Immediate Need processes to ensure applicants are notified adequately, in accordance with MPP section 40-129.531. DHA will issue a reminder to staff of policy relevant to IN, including the IN interview, timely determination of IN requests, and proper noticing. In addition, DHA will develop training for eligibility staff and supervisors to address this observation. The training would be tentatively conducted between the months of October 2025 through January 2026.

DHA will continue to confirm that eligibility staff determined IN eligibility appropriately and provided timely and adequate notices during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

Observation #5 – Inadequate Overpayment Notice of Action (NOA)

One K1 case with an overpayment did not receive adequate notice. The NOA reason was stated as "VARIABLE" which does not provide a proper reason for the overpayment.

Corrective Action:

DHA has reviewed existing written policies on overpayments and has ensured that they are posted and available for all CalWORKs staff to review. DHA will also issue a policy reminder to staff regarding overpayments and ensuring timely and adequate NOAs are provided to recipients when an overpayment has occurred. In addition, DHA will develop training for eligibility staff and supervisors to address this observation. The training would be tentatively conducted between the months of October 2025 through January 2026.

DHA will continue to confirm that eligibility staff provided timely and adequate notices when informing customers of CalWORKs overpayments during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

Observation #6 – School Attendance Verification

One 3F case had school attendance verifications requested for the 15-year-old and 16-year-old children in the AU that were not deemed chronic truants.

Corrective Action:

DHA has reviewed all policy materials regarding CalWORKs school attendance requirements and can confirm that they are updated and posted for all CalWORKs staff to review. DHA will issue a policy reminder to ensure staff are aware of when it is appropriate to request school attendance records from CalWORKs aided teens. In addition, DHA will develop training for eligibility staff and supervisors to address this observation. The training would be tentatively conducted between the months of October 2025 through January 2026.

DHA will continue to confirm that school penalties are applied correctly during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

Observation #7 – Missing Telephonic Signature on the CW 2.1NA form & Missing Updated CW 2.1 Q

One case was missing a signed CW 2.1 NA and updated CW 2.1Q in the case file.

Corrective Action:

DHA has reviewed all policy materials regarding CalWORKs CW 2.1 NA and CW 2.1Q requirements and confirmed that they are updated and posted for all CalWORKs staff to review. DHA will issue a policy reminder to staff that a signed CW 2.1 NA and CW 2.1 Q must be collected at intake for each absent parent and when adding a child to a CalWORKs case with absent parent deprivation. This notice will also remind staff that an updated CW 2.1Q form must be collected when updated information about the absent parent is provided or discovered. In addition, DHA will develop training for eligible staff and supervisors to address this observation. The training would be tentatively conducted between the months of October 2025 through January 2026.

DHA will continue to confirm that CW 2.1 forms are collected and signed, when required, during internal case reviews conducted by line supervisors, Case Review Training supervisors, and Quality Review staff.

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • *www.cdss.ca.gov*

JENNIFER TROIA
DIRECTOR

GAVIN NEWSOM
GOVERNOR

October 28, 2025

Ethan Dye, Director of
Sacramento County Human Assistance
1825 Bell Street Ste. 200
Sacramento, Ca 95825

RE: California Work Opportunity and Responsibility to Kids (CalWORKs) Eligibility Case File Review – Corrective Action Plan

Dear Director Dye:

On behalf of the California Department of Social Services (CDSS), we would like to thank you and your staff for the submission of the Corrective Action Plan (CAP) dated September 29, 2025, informing the Department of the steps Sacramento County has taken to address the two findings identified under Required Documents in the case file the seven observations under Required Documents in the case file.

Based on the steps provided in the CAP and the validations conducted by Sacramento County, the Department finds that the corrective actions taken by your department sufficiently address the Finding(s) incurred and will effectively sustain the corrective action.

Please feel free to contact Cindy Duong at cindy.duong@dss.ca.gov, Christina Libre at chriatina.libre@dss.ca.gov or the Case File Review team at calworkscfr@dss.ca.gov if you have any questions or concerns regarding this letter.

In partnership,

Beverly Jones,
CalWORKs Case File Review Analyst
California Department of Social Services
Early Engagement and Program Assessment Section

cc:
Ethan Dye, Director, Dyee@saccounty.gov
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