



JENNIFER TROIA
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

November 6, 2025

Ethan Dye, Director
Sacramento County Department of Human Assistance
2700 Fulton Avenue
Sacramento, CA 95821

SUBJECT: ELECTRONICS BENEFIT TRANSFER MANAGEMENT EVALUATION
REVIEW – FINAL SUMMARY REPORT

Dear Director Dye:

The California Department of Social Services (CDSS) has completed its comprehensive review of the documentation submitted in response to the draft Management Evaluation (ME) report for the Sacramento County Electronic Benefits Transfer (EBT) program.

The purpose of this Final Summary Report is to provide a clear record of CDSS' determinations, outline the resolution status of each finding, and ensure accountability for corrective actions. This report both confirms whether appropriate steps have been taken to address identified issues and specifies any outstanding concerns that require additional follow-up.

The table below summarizes each finding, the corrective action taken, and CDSS' final determination of whether the issue has been resolved.

Resolution Status in Final Review

#	Description of Finding	Corrective Actions Taken	Final Status (Resolved/Unresolved)
1	Cardstock used for EBT issuance was observed unsecured in a staff cubicle, indicating that required secure storage procedures were not followed.	Corrective actions have not been implemented.	Unresolved

Corrective Action Plan Requirement

The unresolved item (1) listed above requires submission of a Corrective Action Plan (CAP). The CAP serves as the County Welfare Department's (CWD's) formal commitment to address outstanding findings and must be submitted to CDSS by December 18, 2025.

The CAP should include:

- Verification that all EBT cardstock is stored in a locked, secure location when not in use.
- Verification that staff responsible for handling EBT materials received instruction on secure storage procedures, including a copy of the communication or training provided.

Final Determination

The unresolved finding identified in this report will remain unresolved until CDSS receives the required CAP. On September 8, 2025, Sacramento County provided a verbal correction during the debrief for the identified finding; however, written verification confirming that cardstock is now processed and stored in a secure, locked location has not been provided. Separately, Observation #2 was fully addressed on August 12, 2025. Any observations noted in the draft summary report are provided for awareness and program improvement, and it is at the CWD's discretion whether to include such observations in the CAP.

Additional details can be found in the previously sent draft summary report dated October 1, 2025.

Acknowledgement

By receiving this report, Sacramento County acknowledges the finding, its resolution status, and the requirement to submit a CAP. Sacramento County further confirmed on October 24, 2025, that it had no additional comments or corrections to submit in response to the draft summary report.

If you have any questions regarding this final summary, please contact the CDSS EBT ME Review team at EBTME@dss.ca.gov.

Sincerely,



JESSICA ABERNETHY
Branch Chief
Research, Automation, and Data Division



JENNIFER TROIA
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GAVIN NEWSOM
GOVERNOR

October 1, 2025

Ethan Dye, Director
Sacramento County Department of Human Assistance
2700 Fulton Avenue
Sacramento, CA 95821

**SUBJECT: ELECTRONIC BENEFITS TRANSFER MANAGEMENT EVALUATION
REVIEW – SUMMARY OF REVIEW OUTCOMES**

Dear Ethan 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 Management Evaluation (ME) review of the Electronic Benefits Transfer (EBT) program. The CDSS appreciates the assistance and cooperation received during the review process. This letter specifies draft outcomes from the EBT ME Review of Sacramento County on July 16, 2025.

The EBT Policy Unit, within the Enterprise Data Management Branch of the Research, Automation, and Data Division, conducts the EBT ME reviews to evaluate county effectiveness and fulfill the Food and Nutrition Services requirement for CDSS to implement its own EBT ME review process per [7 CFR 275.1](#). The primary goal is to assess the County Welfare Department's (CWD's) EBT operations and ensure compliance with state and federal requirements.

The focus areas of the 2025 review included:

- Processing the Report on Electronic Theft of Benefits (EBT 2259);
- Reviewing EBT card replacement procedures;
- Evaluating county authorization and reconciliation practices related to benefit issuance;
- Assessing county EBT policies, procedures, and resources for compliance with federal and state regulations and guidance; and
- Examining the proper handling and storage of card stock, PIN support, secure card destruction, and card distribution practices.

During the EBT ME Review, the onsite team observed several commendable practices in Sacramento County that strengthen the EBT program. The County's policies and procedures provide clear, step-by-step instructions that guide staff and promote consistency. The team also found it valuable that the County offers on-demand EBT card printing, enabling cardholders to receive immediate replacements when needed.

At the conclusion of the review, the CDSS EBT ME Review team determined that Sacramento County has appropriate procedures in place to meet the needs of EBT cardholders. The review team also identified areas where improvements or changes are needed to ensure compliance with established policies and procedures. This summary includes detailed information on the items reviewed and identifies one (1) finding and two (2) observations from the review.

CDSS FINDINGS

A finding is identified when county policies, procedures, or practices are not in compliance with state or federal mandates. All findings must be addressed by the County.

Finding #1:

During the site visit, the review team observed a staff member with boxes of cardstock in their cubicle. When asked what would happen if they needed to step away, the staff member indicated that the cardstock would remain in place.

Required Corrective Action #1:

The CDSS requires that cardstock be processed in a secure location and locked away when not in use, in accordance with [ACWDL](#) guidance. Counties must also ensure that EBT cards are stored in locked, secure locations and that safeguards are in place to protect PIN selection devices during both storage and business use.

The CDSS acknowledges the County's verbal correction provided during the debrief on September 8, 2025. However, the County must provide written verification confirming that these safeguards have been implemented and that corrective measures are in place.

CDSS OBSERVATIONS

An observation is noted when an area in program operations or management is identified as needing improvement, but not in violation of program requirements. Recommendations for applicable CWD practices are suggested. Any implemented changes must be shared with CDSS.

Observation #1:

During the site visit, the review team examined training materials and found outdated versions of [PUB 388](#) and [PUB 389](#).

Recommendation:

The CDSS recommends regularly checking training packets to ensure the packets contain the most current versions of all materials in compliance with [MPP 16-600](#).

Observation #2 (Addressed):

During the site visit, there was uncertainty regarding the specific EBT card services provided at the Walt Avenue and Galt locations due to undocumented procedures.

Recommendation:

The CDSS recommends developing policies and/or procedures that clearly define the differences in EBT card processes between locations with on-site fiscal staff (such as Florin Road and 28th Street) and the Watt Avenue and Galt locations. These policies should also address any differences in EBT card and cardstock security procedures across these offices.

On August 12, 2025, Sacramento County provided the following information to CDSS: When a customer contacts the Galt bureau either by phone or in person to request an EBT card, they are assisted by a Human Services Specialist (HSS). The HSS will submit a Request for Fiscal Action (RFA) through an internal program and update the California Automated Welfare System (CalSAWS). The request is routed to the Fiscal Office at Floring (SGM Bureau) for processing. The SGM Fiscal staff member reviews both CalSAWS and the RFA to verify that the information matches, then authorizes the card to be printed at the Galt bureau, where the customer originated the request.

Once the card is printed at the Galt Bureau, clerical staff log the card, verify the customer's identity, and obtain their signature on the SC 417 before issuing the EBT card. Clerical staff explain that the customer may retain their existing PIN, or select a new one, and that the PIN can be set either in person or by phone using the number on the back of the card. Customers who have not previously had an EBT card receive an orientation on card use and are provided with PUB 388. Clerical staff also inform customers about the availability of ebtEDGE.

The CDSS acknowledges receipt of this information and confirms that this finding has been addressed.

NEXT STEPS

The CDSS is committed to supporting the County in addressing the identified findings and observations to ensure continued compliance with state and federal requirements.

Upon receiving this draft summary report, Sacramento County may respond to any findings or observations by submitting additional documentation or evidence by October 29, 2025. The CDSS will review the submitted materials and incorporate any necessary changes before issuing the final summary report. The final summary report is anticipated to be released six weeks after the date of this letter.

If the final summary report includes any unaddressed findings, Sacramento County must submit a Corrective Action Plan (CAP) to CDSS. The CDSS will review the CAP to determine whether it adequately addresses the current findings and prevents similar issues in the future. If additional information or actions are needed, the Department will collaborate with Sacramento County to ensure the issues are fully resolved.

The CDSS EBT ME Review team appreciates the cooperation and professionalism demonstrated by Sacramento County staff throughout the course of the ME Review.

The review team recognizes the County's efforts to administer the EBT program effectively and acknowledges the strengths observed during the review.

If you have any questions or require further clarification, please do not hesitate to contact the CDSS EBT ME Review team at EBTME@dss.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Jessica Abernethy". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

JESSICA ABERNETHY
Branch Chief
Research, Automation, and Data Division

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

December 18, 2025

Jessica Abernethy
California Department of Social Services
744 P St.
Sacramento, CA 95814

SUBJECT: Electronic Benefits Transfer ME CAP Response

Dear Ms. Abernethy:

The County of Sacramento Department of Human Assistance (DHA) is writing to provide our Corrective Action Plan response to the finding on the Electronic Benefits Transfer Management Evaluation (EBT ME) for Federal Fiscal Year (FFY) 2025, which was conducted on July 15, 2025, through July 16, 2025. We remain committed to improving service delivery and aligning with the expectations set forth by the California Department of Social Services (CDSS).

In response to your letter dated November 6, 2025, DHA has developed the attached responses to address each area of concern pursuant to the EBT ME review process per 7 CFR 275.1.

If you have any question or require additional informational, please contact Angelica Atkinson, Human Services Program Planner, at (916) 875-3617 or via email at atkinsona@saccounty.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ethan E. Dye", is written over a horizontal line.

Ethan E. Dye

Encloser: Electronic Benefits Transfer ME CAP Response

c: Eduardo Ameneiro, Deputy Director
Renee Lowder, Deputy Director
Cristina Vazquez, Deputy Director
Julie Field, Division Manager
Cathi Aurich, Program Manager
Geoff Porter, Administrative Services Officer III

Finding #1:

Cardstock used for EBT Issuance was observed unsecured in a staff cubicle, indicating that required secure storage procedures were not followed.

The CDSS acknowledges the County's verbal correction provided during the debrief on September 8, 2025. However, the CAP should include:

- Verification that all EBT cardstock is stored in a locked, secure location when not in use.
- Verification that staff responsible for handling EBT materials received instruction on secure storage procedures, including a copy of the communication or training provided.

Sacramento County Response:

During the exit meeting, DHA confirmed that the issue stemmed from a training gap involving one staff member. The staff member has since received the necessary training and was instructed that EBT cards must never be left unattended and if it becomes necessary to step away, the cards must either be securely locked or, when locking is not possible, the cards must be entrusted to a supervisor.

Department Policy 13-40, *Controlled Documents—Security and Reconciliation* (Attachment II), has been updated to include this requirement. All staff responsible for handling EBT materials were notified via email (Attachment I) and will receive the updated policy once it is formally approved.

Observation #1:

During the site visit, the review team examined training materials and found outdated versions of PUB 388 and PUB 389.

Sacramento County Response:

DHA acknowledges that outdated versions of PUB 388 and PUB 389 were included in the packets examined during your visit. DHA is committed to maintaining compliance with MPP 16-600 and will implement a regular review process to ensure all public-facing packets contain the most current versions of required materials. We appreciate CDSS's recommendation and will take proactive steps to strengthen our materials management going forward.

Observation #2 (Addressed):

During the site visit, there was uncertainty regarding the specific EBT card services provided at the Watt Avenue and Galt locations due to undocumented procedures.

Sacramento County Response:

DHA has developed a written workflow, "EBT Issuance for Non-Fiscal Locations" (Attachment III), which outlines the steps to be followed when a request is submitted to print an EBT card at the North Highlands or Galt Bureau location.



JENNIFER TROIA
DIRECTOR

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January 20, 2026

Ethan Dye, Director
Sacramento County Department of Human Assistance
2700 Fulton Avenue
Sacramento, CA 95821

SUBJECT: ELECTRONIC BENEFITS TRANSFER MANAGEMENT EVALUATION
CORRECTIVE ACTION PLAN – FINAL CLOSURE

Dear Director Dye:

The California Department of Social Services (CDSS) has completed its review of the Corrective Action Plan (CAP) and supporting documentation submitted by Sacramento County in response to the Electronic Benefits Transfer (EBT) Management Evaluation (ME) review for Federal Fiscal Year (FFY) 2025.

The purpose of this correspondence is to document CDSS' review of the CAP and to summarize the resolution status of the corrective actions required as a result of the EBT ME review. This letter provides the basis for CDSS' final determination regarding closure of the review.

CAP Review Overview

The CDSS reviewed the submitted CAP and supporting documentation to assess whether the required corrective actions were implemented and whether the identified findings were adequately addressed. Based on this review, CDSS confirms the following:

- The unresolved finding identified in the Final Summary Report issued on November 6, 2025, has been fully addressed through corrective actions implemented by the County Welfare Department (CWD), as documented in the submitted CAP response and supporting materials;
- The CWD provided written verification confirming that all EBT cardstock is now stored in a locked, secure location when not in use and that controlled documents are no longer left unattended. This is consistent with secure storage requirements outlined in Department Policy 13-40;
- Documentation was submitted verifying that staff responsible for handling EBT materials received instruction on secure storage procedures, including written communication reinforcing that EBT cardstock must never be left unattended and must be secured when not actively in use;
- The CWD updated and formally approved Department Policy 13-40, *Controlled Documents – Security and Reconciliation*, to reinforce secure handling storage,

and reconciliation requirements for EBT cardstock and other controlled documents, and provided evidence of policy approval and dissemination;

- The CDSS reviewed the CAP response and supporting documentation including policy updates, staff communications, and workflow materials. Based on this review, CDSS determines the corrective actions to be sufficient to demonstrate ongoing compliance with applicable state and federal requirements; and
- The CWD addressed observations noted during the EBT ME review by removing outdated policy references, committing to regular review of public-facing materials, and developing a written workflow for EBT issuance at non-fiscal locations. While inclusion of observation-related actions is not required for CAP closure, CDSS acknowledges and supports these program improvements.

Final Determination

Based on the review of the CAP and supporting documentation, CDSS has determined that Sacramento County has satisfactorily completed all required corrective actions. Therefore, the EBT ME review for FFY 2025 is fully closed and no further action is required at this time.

Documentation related to this review should be retained in accordance with applicable record retention requirements and may be referenced during future monitoring or review activities.

Acknowledgement

The CDSS acknowledges receipt and approval of Sacramento County's CAP and supporting documentation.

If you have any questions regarding this determination, please contact the CDSS EBT ME Review team at EBTME@dss.ca.gov.

Sincerely,



JESSICA ABERNETHY
Branch Chief
Research, Automation, and Data Division