

# STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES**

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



June 1, 2023

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

Dear Mr. Dye:

The California Department of Social Services' (CDSS') County Performance Monitoring (CPM) Unit conducted a field review of your county's work participation rate (WPR) data and supporting documentation from May 15-17, 2023. To ensure compliance with federal Temporary Assistance for Needy Families (TANF) and Work Incentive Nutritional Supplement (WINS) data reporting requirements and work verification procedures, the CPM Unit reviewed your county's procedures and 120 TANF and 16 WINS cases to determine the accuracy of the WPR data reported to CDSS for Federal Fiscal Year 2021. Attachment A is a preliminary report summarizing the findings for each case that was reviewed. Attachment B includes the codes and acronyms used for the report as well as their descriptions. Attachment C is a template for the Corrective Action Plan that will be used to describe the corrective actions your county will take to ensure accurate reporting and the date the corrective actions will be implemented.

The CPM Unit would like to thank Alina Gusak for coordinating the validation review, answering questions, and providing the documentation needed for the review.

If you would like to dispute any findings, please email your reasons for the dispute and/or additional documentation to Kyra Tovar at kyra.tovar@dss.ca.gov by June 12, 2023. Please maintain the confidentiality of case record information and documentation provided.

We look forward to our continued collaboration to ensure accurate reporting of your county's WPR data. If you have any questions or concerns, please contact Kyra Tovar at kyra.tovar@dss.ca.gov or Kim Murdock, CPM Unit Manager, at kim.murdock@dss.ca.gov.

Sincerely,

**GEOFFREY MILLER** 

Chief, Parent Engagement and Policy Section

Geoffrey Miller

**Enclosures** 

c: Alina Gusak, Sacramento County Department of Human Assistance

# PRELIMINARY REPORT OF FINDINGS – Sacramento County – June 2023

The California Department of Social Services (CDSS) County Performance Monitoring Unit reviewed 120 Temporary Assistance for Needy Families (TANF) and 16 Work Incentive Nutritional Supplement (WINS) case files to determine the accuracy of the Work Participation Rate (WPR) hours reported to CDSS. The findings from the review are below. The TANF findings are listed first and divided into three categories: accurate, errors, and discrepancies. Please refer to *Attachment B* for code and acronym descriptions. Refer to *Attachment C* for instructions on what is needed to address/correct the review findings.

Accurate cases are those where the hours that were reported matched CDSS' findings. Error cases are those that should not have been reported as excluded or were reported as meeting the All Families WPR, but CDSS determined the cases did not meet the WPR. Discrepancies are cases that were either reported as meeting or not meeting the WPR, and CDSS agreed but could not validate the same number of reported hours or, for excluded cases, the reason for the exclusion was incorrect.

# **TANF FINDINGS**

The preliminary findings for TANF cases revealed 116 accurate and 4 discrepancy cases.

# **Discrepancy Cases**

| Finding | Review # | Case #  | Case<br>Type | Activity | Hours<br>Reported | Hours<br>Verified | Doc.<br>Code | Documentation<br>Dates    |
|---------|----------|---------|--------------|----------|-------------------|-------------------|--------------|---------------------------|
| 9       | C07039   | 1B9WJ49 | 3            | UE-A1    | 47                | 41                | 5            | 07/2021                   |
| 9       | C07034   | 1B3QM70 | 2            | UE<br>JS | 14<br>30          | 7<br>27           | 2<br>4       | 07/03-07/16/21<br>07/2021 |
| 9       | H11011   | 1B9PD19 | 3            | UE-A1    | 40                | 37                | 1            | 11/02-11/29/20            |
| 9       | H07022   | 1B9D887 | 3            | UE-A1    | 47                | 59                | 7            | 07/01-07/19/21            |

#### WINS FINDINGS

The preliminary findings for WINS cases revealed 15 accurate and 1 discrepancy case.

## **Discrepancy Case**

| Finding | Review # | Case #  | Case<br>Type | Activity | Hours<br>Reported | Hours<br>Verified |   | Documentation<br>Dates |
|---------|----------|---------|--------------|----------|-------------------|-------------------|---|------------------------|
| 9       | U02188   | 1B3WR77 | 1            | UE       | 16                | 11                | 4 | 02/08-02/14/21         |

# **CODE AND ACRONYM DESCRIPTIONS**

| Finding<br>Code | Finding Description  |
|-----------------|--|
| 1               | Reported monthly instead of weekly hours                                     |
| 2               | Missing or incorrect documentation in case file                              |
| 3               | Should not have been excluded/disregarded, or incorrect reason for exclusion |
| 4               | Projecting issue   |
| 5               | Used more than a month of hours, or used future month's hours                |
| 6               | Rounded hours incorrectly, or mathematical issue                             |
| 7               | Used minimum wage to calculate hours when hourly wage was unknown            |
| 8               | Self-employment issue  |
| 9               | Documentation in case file did not support reported hours                    |
| 10              | Deemed for minor HoH or Single Custodial Parent with a child less than six   |
| 11              | Individual did not participate in reported activity                          |
| 12              | Documentation in case file was missing required information                  |
| 13              | Program integrity/fraud issue  |
| 14              | Exceeded time limits for Job Search/Job Readiness or Vocational Education    |
| 15              | Reported excess homework hours   |
| 16              | Reported Unsubsidized Employment as employer-employee or self-employ         |
| 17              | Reported hours for days when individual was not scheduled to participate     |
| 18              | Did not use actual hours to meet All-Families rate                           |
| 19              | Updated case file but did not update RADEP or E2Lite                         |
| 20              | One parent did not participate for at least 30 hours in a Two-Parent case    |
| 21              | Deemed hours for Work Experience or Community Service                        |
| 22              | Multiplied by 2 or 2.17 incorrectly  |
| 23              | Averaged earnings statements prior to calculating weekly hours               |
| 24              | Used WINS proxy to calculate hours   |
| 25              | Reported more hours than the FLSA calculation allows                         |
| 26              | Using overtime to project  |
| 27              | Used three weekly paystubs   |

| Case Type<br>Number | Case Type Description                            |
|---------------------|--|
| 1                   | Single custodial parent with child less than six |
| 2                   | Non two-parent                                   |
| 3                   | Two-parent                                       |
| 4                   | Excluded/disregarded                             |
| 5                   | Minor head of household                          |

| Activity    | Activity Description  |  |  |  |  |
|-------------|---|--|--|--|--|
| Acronym     |   |  |  |  |  |
| CS          | Community Service   |  |  |  |  |
| DEEM        | Deemed Hours  |  |  |  |  |
| EDRE        | Education Directly Related to Employment                              |  |  |  |  |
| EDRE – MHOH | Education Directly Related to Employment – Minor Head of              |  |  |  |  |
|             | Household   |  |  |  |  |
| JS          | Job Search/Job Readiness  |  |  |  |  |
| JSTDRE      | Job Skills Training Directly Related to Employment                    |  |  |  |  |
| OJT         | On-the-job Training   |  |  |  |  |
| OWA         | Other Work Activities   |  |  |  |  |
| PCIPCS      | Providing Childcare for an Individual(s) Participating in a Community |  |  |  |  |
|             | Service Program   |  |  |  |  |
| SS          | Satisfactory School Attendance  |  |  |  |  |
| SS - MHOH   | Satisfactory School Attendance – Minor Head-of Household              |  |  |  |  |
| SPRIV       | Subsidized Private  |  |  |  |  |
| SPUB        | Subsidized Public   |  |  |  |  |
| UE          | Unsubsidized Employment   |  |  |  |  |
| VOC         | Vocational Education  |  |  |  |  |
| WE          | Work Experience   |  |  |  |  |

| Acronym | Description |
|---------|-------------|
| A1      | Adult 1     |
| A2      | Adult 2     |

| Verification<br>Code | Verification Description |  |  |  |  |
|----------------------|--------------------------|--|--|--|--|
| 1                    | Earnings statement       |  |  |  |  |
| 2                    | Attendance record        |  |  |  |  |
| 3                    | Timesheet                |  |  |  |  |
| 4                    | The Work Number          |  |  |  |  |
| 5                    | Employer verification    |  |  |  |  |
| 6                    | Activity sheet           |  |  |  |  |
| 7                    | Sworn statement          |  |  |  |  |
| 8                    | Consortia                |  |  |  |  |

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# **FFY 2021 Corrective Action Plan**

County Name: Sacramento
Date: June 1, 2023
Due Date: June 12, 2023

For each finding below, please describe the corrective actions your county will take and the date the corrective actions will be implemented. Send the Corrective Action Plan to the Performance Monitoring Unit at WPRPolicy@dss.ca.gov by the above due date. Please contact Kyra Tovar at kyra.tovar@dss.ca.gov if you have any questions.

| Finding                | Review # | Corrective Action by County | Planned<br>Implementation<br>Date |
|------------------------|----------|-----------------------------|-----------------------------------|
| Documentation did not  | C07039   |                             |                                   |
| support reported hours | C07034   |                             |                                   |
|                        | H11011   |                             |                                   |
|                        | H07022   |                             |                                   |
|                        | U02188   |                             |                                   |