



**KIM JOHNSON**  
DIRECTOR

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

October 5, 2023

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

Dear Director Dye:

Thank you for your cooperation and assistance in the completion of the Federal Fiscal Year (FFY) 2023 CalFresh Management Evaluation (ME) Review, which was conducted from July 10, 2023 through July 14, 2023 in Sacramento County. We would like to extend a special thank you and our appreciation to Yevgeniy Kurdyumov for facilitating the review process.

As mandated by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), the California Department of Social Services (CDSS) is required to conduct ME reviews every year in large counties to identify areas of non-compliance to assist in improving CalFresh (CF) program operations. The ME review consisted of several areas including Payment Accuracy, Assessment of Corrective Action, Program Access, and Timeliness of Application Processing.

An overview of the findings, recommendations, and required corrective actions were discussed with your county management staff at the exit conference held on July 14, 2023. The exit conference provided the county with information necessary to develop and initiate corrective action changes while waiting for the final findings letter.

With the delivery of the final findings via this letter, the CDSS requests that a Program Improvement Response (PIR) plan be submitted by November 20, 2023 to address the findings and recommendations included in this report. Please include a description of activities designed to address each finding, the contact person responsible for the activity, and the expected implementation and completion dates for each activity. In addition, please provide verification such as policy memos or written procedures for those recommendations in which the county is making changes.

The ME review for Sacramento County resulted in a total of 23 Program Access findings. A summary of findings are as follows:

- Potential applicants in the lobby were not informed of all methods to apply for CalFresh (CF).
- Applicants and recipients who experienced extended wait times in the lobby were directed to contact the call center for basic certification services.
- Application processing was held when verification was already provided by the household to approve at least one household member.
- Access to the office was not allowed during the regular hours of operation.
- Confidentiality was not consistently maintained.
- Substantial Gambling or Lottery Winnings Reporting Requirements were not reviewed during interviews.
- Coverage of Voter Registration was not consistently reviewed during interviews.
- Expedited Service (ES) process was incorrect.
- Household was not informed the interview was waived after the appointment letter had been sent.
- The timeframe of the income verification requested was not specified.
- Applicant without permanent residence was required to reschedule the interview to include parents without clarifying that they lived together.
- Appointment letters were sent before the *Notice of Expiration of Certification* (NEC).
- *Notice of Missed Interview* (NOMI) was inappropriately sent.
- Beginning date of aid (BDA) was not maintained correctly for online applications and paper applications submitted in drop boxes.
- The date applications were submitted in person was not recorded on applications.
- Mystery callers were not successful during regular business hours.
- Mystery callers were not consistently informed of ES.

Additionally, the ME team reviewed 30 CF cases (8 denials, 8 terminations, 7 recertifications, and 7 initial approvals). Of the cases reviewed, 25 cases were found to have errors, resulting in 18 findings pertaining to the Case Review component of the ME. The detailed results of the case reviews were shared and discussed with members of your team during the week of the ME review and are enclosed within this report. Some of the primary error trends that were found in the case reviews are listed below:

- Applications were not date stamped.
- Personal contact was not attempted or documented for missing or incomplete *Eligibility Status Report* (SAR 7) or recertification applications.
- Miscalculated income in the budget.

### **Noteworthy Initiatives and/or Accomplishments**

The CDSS would like to congratulate the county on maintaining high standards and meeting regulatory guidelines. We would like to highlight where your staff excelled and continue to provide essential customer service that allows more individuals access to the CF program.

As of the January 2023 to March 2023 quarter, the county's timeliness for application processing for thirty-day was 96.95 percent. Despite the county's total average CF caseload increase of over 30,200 (29 percent) cases, Sacramento County continues to maintain their timeliness above 90 percent.

The CDSS also commends the county staff for consistently covering the following certification regulatory components:

- Rights and Responsibilities.
- All four SAR 7 components; including verbal informing, SAR 7 written explanation, sample copy of the SAR 7, and telephone number to obtain assistance to complete the SAR 7.
- Providing copy of the application to online applicants.

Your county's ME Consultant is Amber Johnson. Should you have any questions or require additional information or assistance, please contact her at (559) 240-0689 or via email at [Amber.Johnson@dss.ca.gov](mailto:Amber.Johnson@dss.ca.gov). You can also contact your county's designated Technical Assistance Manager, Chrissy Harrigan-Smith, at (916) 204-9119 or via email at [Crissy.Harrigan-Smith@dss.ca.gov](mailto:Crissy.Harrigan-Smith@dss.ca.gov). Once again, we thank you and the members of your staff for your full cooperation and participation in this review.

Sincerely,

A handwritten signature in cursive script that reads "Tami Gutierrez".

TAMI GUTIERREZ, Chief  
CalFresh Operations Bureau

Enclosure

cc: Yevgeniy Kurdyumov, Program Planner

**CALFRESH MANAGEMENT EVALUATION REPORT FOR SACRAMENTO COUNTY**

**INTRODUCTION**

During the week of July 10, 2023, Amber Johnson, Morgan Penner and Walter Galvez from the California Department of Social Services (CDSS), Operations Bureau conducted a CalFresh Management Evaluation (ME) in Sacramento County. The major areas examined during this review were Payment Accuracy/Corrective Action Assessment, Program Access, and Timeliness of Application Processing.

The review was conducted at the following locations:



Susie Gaines Mitchell Bureau  
2450 Florin Road  
Sacramento, CA 95822



East Commerce Call Center  
4450 East Commerce Way  
Sacramento, CA 95834



Pat Wright Bureau  
1725 28<sup>th</sup> Street  
Sacramento, CA 95816

The CDSS requests that a Program Improvement Response (PIR) plan be submitted by November 20, 2023. The PIR plan should address the findings, recommendations and corrective actions included in this report. Please include a description of the activities designed to address each finding, a contact person responsible for the activity, and the expected implementation and completion dates.

Please email the PIR to [CWDCalFreshEvaluations@dss.ca.gov](mailto:CWDCalFreshEvaluations@dss.ca.gov) or mail it to:  
California Department of Social Services  
CalFresh Operations Bureau  
888 South Figueroa Street, Suite 360  
Los Angeles, CA 90017

**SACRAMENTO COUNTY CALFRESH DATA AND STATISTICS**

<b><u>Measurement:</u></b>	<b><u>Percentage:</u></b>	<b><u>Period:</u></b>
County Active Error Rate	6.26	October 2022 – December 2022
California Active Error Rate	7.96	October 2022 – December 2022
National Active Error Rate	10.71	October 2022 – December 2022
County Negative Error Rate (CAPER)	37.50	October 2022 – December 2022
California Negative Error Rate	38.92	October 2022 – December 2022
National Negative Error Rate	N/A	October 2022 – December 2022
County 3-Day ES Issuance	63.37	January 2023 – March 2023
County 7-Day ES Issuance	82.67	January 2023 – March 2023
County CF Apps Approved within 30 days	96.95	January 2023 – March 2023

**PAYMENT ACCURACY AND CORRECTIVE ACTION ASSESSMENT**

The purpose of the Payment Accuracy and Corrective Action Assessment section is to assess the county’s performance data and confirm that adequate corrective action measures are in place. It focuses on Active error rates and Case and Procedural Error Rates (CAPER). The reviewed components have significant potential to improve county error rates.

The scope of the review includes the following:

- Case Action Reviews – review of randomly selected denial, termination, recertification, and initial approval cases.
- Second Party Reviews – evaluation of case review systems, processes for capturing and arraying statistically generated data and identifying trends for corrective action purposes.
- Quality Control (QC) – review of QC cases and factors contributing to discovered errors.
- Training – assessment of induction training, training content, ongoing training and training to ensure State and federal policy changes are implemented.

**Case Action Reviews**

The purpose of the Case Action Reviews section is to determine whether the county is in compliance with CalFresh (CF) policies and procedures for approving, denying, and terminating cases. The reviews are conducted to ensure the action taken, notification to the household, and case processing procedures were correct. A correct case review is one that is based on a correct reason as documented in the case record, is accurately communicated to the household, and is procedurally correct.

Observations:

<b><u>Type</u></b>	<b><u>Reviewed</u></b>	<b><u>Errors</u></b>
Denials	8	6
Terminations	7	7
Recertifications	7	5
Initial Approvals	8	7
<b>Total</b>	<b>30</b>	<b>25</b>

The review team examined 30 CF cases (8 denials, 7 terminations, 7 recertifications, and 8 initial approvals). Of the cases reviewed, 25 were in error (6 denials, 7 terminations, 5 recertifications and 7 initial approvals). Please note that this review will not be included in the county's yearly sample of QC reviews. It serves only as an independent review for the purposes of this evaluation.

Denial Case #1

This case was in error because the household was not informed of the Rights and Responsibilities (R&R) during the interview. Additionally, the denial *Notice of Action* (NOA) was not sent to the household.

Denial Case #2

This case was in error because the *Application for CalFresh, Cash Aid, and/or Medi-Cal/Health Care Programs* (SAWS 1) was not physically date stamped to record the beginning date of aid (BDA). Furthermore, the *Request for Verification* (CW 2200) form was not sent to the household in their preferred language of Vietnamese, it did not include the timeframe for the earned income requested, and the CalFresh (CF) program box was not marked for the CF items requested.

Denial Case #3

This case was in error because the *Notice of Missed Interview* (NOMI) was inappropriately sent to the household after the interview was completed. Additionally, the CW 2200 form was not saved to the case record. Further, the denial NOA listed the reason as ineligible student, however, the career program was not considered an institution of higher education and student enrollment status of at least half-time was not documented. The second denial NOA listed the reason as failure to provide verifications that were not requested. Lastly, the case documentation did not sufficiently explore student status and did not include sufficient details regarding the verifications needed to process the application.

Denial Cases #4 and #6

These cases were in error because duplicate telephonic signatures were obtained when signed SAWS 1 were already on file. Additionally, the SAWS 1 were not physically date stamped to record the BDA.

Denial Case #7

This case was in error because the SAWS 1 was not physically date stamped to record

the BDA. Also, the correct BDA was not allowed when the household made contact on 4/3/2023, which was the end of the interview compliance period for the previous application dated 3/2/2023. Additionally, Expedited Service (ES) was not granted within three days from the date of discovery after the household reported new information during the interview. Furthermore, the denial action for failure to provide verifications was incorrect since the verifications were not required. Lastly, the denial NOA was not sent to the household.

**Termination Cases #9, #10, and #13**

These cases were in error because personal contact was not attempted before benefits were terminated for the *Eligibility Status Report* (SAR 7) not being received.

**Termination Case #11**

This case was in error because the termination NOA was not sent to the household.

**Termination Case #12**

This case was in error because the budget included the incorrect shelter amount.

**Termination Case #14**

This case was in error because the case documentation did not sufficiently explore the household's temporary or permanent absence from the state when they made telephone contact on 3/7/2023 to complete the SAR 7. Case documentation suggested discrepant residence beginning 10/14/2022 and address change was not reported on the SAR 7.

**Termination Case #15**

This case was in error because the CW 2200 form was not sent to request the ES postponed verification. Also, the CW 2200 form over-verified by requesting the social security number for the newborn when it was not required for CF program or documented as questionable.

**Recertification Case #16**

This case was in error because the recertification interview was scheduled for the Elderly Simplified Application Project (ESAP) household without documentation of why it was required. Further, the audio recording of the telephonic signature was not saved to the case record and the telephonic signature waiver requirements were not met.

**Recertification Case #17**

This case was in error because the NOMI was not sent to the household after the interview was not completed. Additionally, personal contact was not attempted before benefits were terminated when the recertification process was not complete.

**Recertification Case #18**

This case was in error because the recertification interview was scheduled for the ESAP household without case documentation of why it was required. In addition, verification of income from the Social Security Administration (SSA) was not saved to the case record. Further, confidentiality was not maintained when case information was

discussed with the unauthorized non-household member. Lastly, the ESAP household was incorrectly verbally informed the SAR 7 would be required in six months.

**Recertification Case #20**

This case was in error because the appointment letter was sent to the ESAP household, and it was sent prior to the due date of the recertification packet.

**Recertification Case #21**

This case was in error because CF and Supplemental Nutrition Benefit (SNB) benefits were incorrectly terminated and termination NOA were incorrectly sent to the household. Furthermore, the income from SSA and In-Home Supportive Services (IHSS) used in the budget did not correspond with the income verification.

**Approval Case #24**

This case was in error because the Standard Utility Allowance (SUA) deduction was allowed when it was reported that utilities were included with the shelter expense. Further, the CW 2200 form requested verification of dependent care expense although the reported expense did not qualify as dependent care expense.

**Approval Case #25**

This case was in error because case documentation did not sufficiently clarify the reason the final pay reported was prior to the last day of work.

**Approval Case #26**

This case was in error because the self-employment expense deduction was not explored with the household or documented as such for the budgeted self-employment income.

**Approval Case #27**

This case was in error because the SAWS 1 was not physically date stamped to record the BDA. Also, the CW 2200 form specified the period of income requested to 3/2023 instead of the 30 days from the date of application.

**Approval Case #28**

This case was in error because the approval NOA listed ES postponed verification, however, verifications were not documented as postponed or requested from the household.

**Approval Case #29**

This case was in error because the interview was not scheduled timely for the ES-eligible application and benefits were not available within the three-day ES timeframe.

**Approval Case #30**

This case was in error because the timeframe for the requested earned income was not listed on the CW 2200 form.



**Assessment:**

County procedures need improvement as described below.

**Recommendations:**

1. Explore the electronic messaging functionality for personal contact to make sure personal contact messages are sent when electronic consent has been obtained.
2. Remind staff to use language services to inform households of the R&R in their preferred language when other interpretive options are unavailable.
3. Consider updating all internal policy documents relating to personal contact so that staff are reminded to make the personal contact attempts with households who fail to provide a completed SAR 7 or recertification application.
4. Remind staff to explore and provide households the option to choose either actual costs of producing self-employment income or a standard deduction of 40 percent of gross earned income when self-employment income is reported, at intake and recertification.

**Corrective Actions Required:**

1. Ensure that income, shelter costs, expenses, and deductions are correctly calculated to determine the household's budget. Additionally, verification of all gross non-exempt income must be on file before making an eligibility determination. (7 CFR 273.9(d)(6); MPP 63-502 and 63-503; ACIN I-45-11; ACL 12-25 and 14-66)
2. Ensure that NOMI are sent to households who fail to complete their scheduled interview. (MPP 63-300.46)
3. Ensure that personal contact is made with households via telephone or, if consent has been provided, text message or electronically before benefits are terminated to remind them that a complete SAR 7 or recertification application is due and attempt to collect the necessary information to complete it. (ACL 21-24; ACIN I-21-22)
4. Ensure that applicants entitled to ES are scheduled timely interview appointments, and benefits are issued within the three-day ES timeframe from the date of application or date of discovery. (ACIN I-14-11 and I-11-20; ACL 16-14)
5. Ensure that households are provided with services and notices in their preferred primary language. When correspondence cannot be translated, the *Notice of Language Services* (GEN 1365) must be sent with the non-translated correspondence. (MPP 21-115.2; ACL 03-56)
6. Ensure that a time period is indicated when income is requested, usually the 30 days from the date of application for intake, or 30 days from the recertification application or verification request at recertification. When a different period of income is

**ENCLOSURE**

requested, ensure that case documentation supports such a request.  
(7 CFR 273.10(c)(1)(ii); ACL 20-48 and 21-24)

7. Ensure that a clear, accurate, and complete CW 2200 form is sent to the household and maintained in the case record when verifications are requested. The CW 2200 form must have the appropriate program boxes marked, and must not request verifications that are not required for the CF program or not mandatory and not questionable.  
(7 CFR 273.9(c)(17), 273.9(d)(4) and 273.9(d)(5); MPP 63-502.2(p)(5); ACL 14-26, 18-20, 21-93 and 22-45; ACIN I-54-22)
8. Ensure that applications submitted are saved in the case file. When the telephonic signature is utilized, ensure the audio recording is saved in the case file or the telephonic signature waiver requirements are met.  
(7 CFR 273.14(b)(2); ACL 14-101; ACWDL issued April 2, 2020 and March 28, 2023)
9. Ensure that the date the application is received is physically recorded on the application. (7 CFR 273.2(c)(1)(iv); MPP 63-300.33)
10. Ensure that Non-Assistance CalFresh (NACF) households are only required to sign one application. The telephonic signature is sufficient to begin the application process and an additional signature is not required.  
(7 CFR 273.2(a)(1); ACL 13-96 and 15-84)
11. Ensure that recertification interviews are not scheduled for ESAP households unless it is requested by the household, the recertification application is going to be denied, or the information supplied is questionable, incomplete or contradictory.  
(ACL 20-145)
12. Ensure that notices sent to households are accurate, clear, and support eligibility factors. Also, postponed verification(s) must not be listed on the NOA unless required for the CF program or documented as questionable, and requested using a CW 2200 form. (MPP 63-301.54 and 63-504.22)
13. Ensure that case documentation is accurate, sufficient and available in the case record to support case actions. Discrepant or contradictory information, such as student status, temporary or permanent absence from the home, and employment information, must be clarified and documented in the case file.  
(FNS Handbook 310, Section 1310; 7 CFR 273.2(f)(6); MPP 63-300.5(j))
14. Ensure that R&R are reviewed with applicants and recertifying households during their interviews. Also, households entitled to ESAP must not be informed to provide a SAR 7 during the ESAP waiver period from 3/1/2022 through 9/26/2026.  
(MPP 63-300.4; ACL 20-145 and 22-15)

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15. Ensure that confidentiality is properly maintained by obtaining verbal or written authorization from households prior to disclosing case sensitive information to non-household members. (MPP 19-002.1, 63-201.3 and 63-402.6; ACL 19-55)
16. Ensure that households receive timely and adequate notice for negative actions. (FNS Handbook 310, Section 1310 and 1350.2; MPP 63-504; ACL 21-93)
17. Ensure that the BDA is correctly preserved based on the date the application was filed. The original BDA must be preserved when households who fail to complete their initial scheduled interview make contact within 30 days from the date of application. (MPP 63-300.33 and 63-300.46)
18. Ensure that negative actions taken are correct, accurate and consistent with the case record. Also, NOA must be sent with the correct reason(s) listed to accurately inform households of the reason(s) the negative action is/are taken. (FNS Handbook 310, Section 1350.2; MPP 63-300.4, 63-300.5(a)(1), 63-504.2 and 63-504.6; ACL 19-10, 20-08 and 21-93)

## **Second Party Reviews**

### **Observations:**

- Supervisors review post-approval and negative actions (approvals, denials, terminations, and recertifications) for staff.
- Supervisors review four cases per month for new workers and two cases per month for established intake and continuing workers.
- At the Service Center, Supervisors also conduct one call review for staff and a random number of tasks per month. Case review results are shared with staff immediately and are reviewed during their monthly one-on-one meetings.
- Case Review and Training (CRT) Supervisors and the Quality Assurance (QA) team conduct case reviews to build and validate the county's quarterly training.
- Case reviews are targeted based on identified error trends or random selection samples. The QA team reviews 350 full case reviews and 300 targeted reviews per month, along with 40 third-party reviews by a Program Specialist in the QA team.
- Error trends are tracked and discussed with the management team. The error trends are used to determine the subject matter for future trainings.
- A monthly Art of Accuracy webinar is developed and provided to Supervisors to share with staff. The webinar is also posted on the county's intranet for staff to access.

### **Assessment:**

The county has the necessary processes in place to ensure accuracy for both Active and negative case actions.

### **Recommendations:**

1. Continue analyzing the data gathered through the review process to identify common error trends and ensure cases are processed correctly.

### **Corrective Actions Required:**

None.

**Quality Control**

**Observations:**

- Sacramento County is currently responsible for reviewing the federally-sampled Active and CAPER cases. The county has a formal QC process and corrective action team that is responsible for reviewing potential Active and negative case errors. If an error is cited, the county has ten days to provide State QC with a corrective action that will be implemented to prevent future errors.
- Sacramento County QC reviewed a total of 14 Active cases for Federal Fiscal Year (FFY) 2023 (October 2022 through December 2022) of which 10 were completed, 1 was Not Subject to Review (NSTR) and 3 were dropped. Of the 10 completed cases, 1 was found to be in error. The county's Active error rate was 6.26 percent.
- Sacramento County QC reviewed a total of 8 CAPER cases for FFY 2023 (October 2022 through December 2022). Of the 8 completed cases, 3 were found to be in error. The county's CAPER was 37.50 percent.
- Interviews with staff indicated that they are aware of the error rates, and they know where to obtain the information.

<b>Sacramento County FFY 2023</b>	<b>County Error Rate</b>	<b>State Average</b>	<b>Difference</b>
Active Cases	6.26 percent	7.96 percent	<b>1.70 below</b>
CAPER Cases	37.50 percent	38.92 percent	<b>1.42 below</b>

**Assessment:**

For FFY 2023, the county's Active error rate and CAPER were below the state average.

**Recommendations:**

1. Continue meeting with CDSS staff regarding any QC error findings or pertinent information.
2. Continue informing staff of the Active error rate and CAPER. Awareness of the error rates helps staff understand their role in reducing case action errors, ensure that households receive the correct benefit allotment and avoid wrongful termination or denial.
3. Continue to focus on maintaining the Active error rate and CAPER below the state average.

**Corrective Actions Required:**

None.

**Training**

**Observations:**

- Sacramento County provides formal induction training for the CalWORKs (CW), CF, and Medi-Cal (MC) programs.
- At the time of the ME review, there were two classes expected to finish on 7/14/2023 and 7/21/2023. The next hiring class is expected to start on 12/23/2023.
- All workers are dual program trained in CF and MC. A select number of staff have additional training in the CW program.
- Training lasts 16 to 22 weeks, depending if the trainee is getting additional training for another program. Trainings consist of pre-recorded presentations and talking sessions in person and virtually. In the last four to five weeks of training, on-the-job training (OJT) is provided to trainees where they process live cases with the assistance of trainers.
- Program Specialist review new policies released by CDSS and create Program Documents. Staff are informed of the Program Documents with an alert via email that includes a link, and it is also stored on the county intranet. Supervisors are expected to go over Program Documents in unit meetings.

**Assessment:**

The county continuously explores ways to improve its training classes.

**Recommendations:**

1. Continue using error trends to customize and develop training courses.
2. Continue sharing error trends and policy changes with staff.

**Corrective Actions Required:**

None.

**PROGRAM ACCESS**

The purpose of the Program Access section is to identify barriers to CF participation in the county's application and recertification processes. This includes identifying areas of non-compliance and evaluating the delivery of service to applicants and participants. Online application filing, screening and document imaging are also reviewed.

The scope of the review included the following:

- Customer Service – hours of operation, availability of applications, intake and continuing operations, application filing procedures, ES screening, applicant intake interviews, participant recertification interviews, lobby procedures, applicant/participant interviews, and outreach activities.
- Website – hours of operation, certification sites, application options, ES information, and call/service center information.
- Online Applications – county efforts at accepting and processing online applications.
- Outreach – county efforts at increasing CF participation.
- Document Imaging – county operations for the conversion of paper documents to electronic format.
- Call/Service Center – hours of operation, effectiveness of operations, and customer surveys.

**Customer Service**

**Observations:**

- The Pat Wright Bureau hours of operation are Monday through Friday from 7:45 a.m. to 4:00 p.m. All other locations are open Monday through Friday from 8:00 a.m. to 4:00 p.m. The hours are displayed on the building's exterior. (MPP 63-205.1)
- Offices have an exterior and interior drop box for documents to be dropped off. (MPP 11-601.311(b))
- Applications and documents can be submitted with reception during business hours. A receipt is given to all. (MPP 63-300.61)
- Informing of ES is available. (MPP 63-301.521)
- The lobbies have brochures of information and resources available, such as list of emergency food providers. They are accessible during business hours. 211 is also used to access legal and food resources. (MPP 63-201.42)
- The lobbies use an alphanumeric system to ensure privacy is protected. (7 CFR 273.2(e)(1))
- Kiosks are available to check in for services and direct traffic.

## ENCLOSURE

- Bilingual staff are available for Spanish, Farsi, Russian, Ukrainian, and Cantonese. Many language vendors are used for interpretive services for all other languages. The Sacramento County ombudsman can also assist with providing interpreted written forms. The county website links to the CDSS website with translated forms. (MPP 63-202.21)
- The methods to apply (telephone, in-person, online, by mail, and via fax) are posted in the lobbies. All the methods to apply for benefits were not provided to a potential applicant in the Susie Gaines Mitchell Bureau lobby who was directed to wait for an application ticket, call in, or go online to apply for benefits. The options to apply by fax or in person were not provided. (MPP 63-300.3)
- There are telephones available in the lobby to call the Service Center.
- The minimum requirements (name, address and signature) to file a CF application are posted in the lobbies. (MPP 63-300.32)
- Applications are available in the lobbies in English, Spanish and Russian with clear signage. (MPP 63-300.34)
- Applicants and recipients in the lobby of the Susie Gaines Mitchell Bureau were referred to contact the Service Center to report changes or follow up on applications after waiting hours to obtain assistance in person. (MPP 63-205.21; 7 CFR 273.2(a)(1) and 273.2(c)(2)(i))
- Application previously denied for failure to provide had not been acted on after verifications were provided by the household. Case comments indicated Systematic Alien Verification for Entitlements (SAVE) report was pending for processing when the Eligibility Letter document in the case record was sufficient to approve at least one of the household members. (ACIN I-45-11 and I-65-11)
- Individuals who arrived during regular business hours of 8:00 a.m. to 4:00 p.m. were told to wait in line outside of the Susie Gaines Mitchell Bureau to enter the office. However, the office doors were locked at 4:00 p.m. and individuals who arrived prior to 4:00 p.m. were not allowed to enter the office or receive services. (MPP 63-205.21 and 63-300.38; ACIN I-83-21)
- Confidentiality was not protected. At reception, full name and date of birth (DOB) was asked out loud. Documents containing personally identifiable information (PII) were left unattended by the printer with information side up. (MPP 19-002.1 and 63-201.34)

### ***CalFresh/Medi-Cal Dual Enrollment Efforts***

- In April 2023, training was completed for the last remaining MC-only eligibility staff to be cross trained in CF.



**ENCLOSURE**

- All MC applications are reviewed for CF potential eligibility as all eligibility staff are cross trained.

**Assessment:**

County procedures need improvement as described below.

**Recommendations:**

1. Remind staff of the ability to use 211 as a resource line.
2. Consider offering a customer satisfaction survey in the open lobby bureaus to obtain feedback.
3. Consider streamlining the business process from the Pat Wright Bureau for all the in-person bureaus.

**Corrective Actions Required:**

1. Ensure that potential applicants are informed of all the methods to apply for CF (telephone, in-person, online, by mail, and via fax) when they inquire about applying for CF. (MPP 63-300.3)
2. Ensure that households are provided timely, accurate, and fair service to participate in the CF program. (MPP 63-205.21; 7 CFR 273.2(a)(1) and 273.2(c)(2)(i))
3. Ensure that eligibility determination is not held for information from a SAVE query when other valid verification is on file. (ACIN I-45-11 and I-65-11)
4. Ensure that households can obtain services at certification sites during the regular hours of operation. (MPP 63-205.21 and 63-300.38; ACIN I-83-21)
5. Ensure that applicants and recipients PII is safeguarded by not requesting it out loud in the lobby and by covering or securing documents. (MPP 19-002.1 and 63-201.34)

## **Intake and Recertification Interviews**

### **Observations:**

- Staff were courteous and made households feel at ease during interviews. (MPP 63-300.4)
- Confidentiality was not properly maintained. Households were authenticated with at least two items of PII, however, in some instances the CF program was mentioned before households were authenticated. (MPP 63-201.34)
- Coverage of the R&R were consistent. (MPP 63-300.4)
- Coverage of the Substantial Lottery or Gambling Winnings Reporting Requirements and the reporting threshold were not consistently reviewed with households. (ACL 20-132; ACIN I-60-22)
- Coverage of Voter Registration was not consistent. (ACIN I-01-12; ACL 18-39)
- All the SAR 7 components were consistently covered. The four SAR 7 components are:
  - The verbal explanation of the SAR 7. (MPP 63-300.411)
  - The written explanation for the SAR 7. (MPP 63-300.411)
  - The sample copy of the SAR 7. (MPP 63-300.412)
  - The telephone number households to call and ask questions or obtain help in completing the SAR 7. (MPP 63-300.414)

### ***Susie Gaines Mitchell Bureau***

- ES was incorrectly screened and interviews were not scheduled within the three-day ES timeframe. First, the interview was scheduled on 7/11/2023 for the online application with the BDA of 6/27/2023. When the interview was scheduled, ES was incorrectly determined ineligible for “incomplete paperwork.” Second, the 6/29/2023 SAWS 1 had the ES questions marked “yes” but ES screening completed on the same day was denied for insufficient information. The interview appointment was scheduled for 7/11/2023. (ACL 16-14; ACIN I-14-11)
- Household with scheduled interview was not informed that the interview was waived. (FNS Handbook 310, Section 1340; MPP 63-300.46)

### ***Pat Wright Bureau***

- The interview appointment for the ES-eligible application dated 7/6/2023 was scheduled for 7/13/2023, outside of the three-day ES timeframe. (ACL16-14; ACIN I-14-11)

## ENCLOSURE

- CW 2200 form requested income but did not indicate the timeframe for the income requested. (7 CFR 273.10(c)(1)(ii); ACL 20-48 and 21-24)
- Applicant under age 22 reporting without permanent residence, or couch surfing, on the application was told when called for the schedule interview that parents must be included in the application and the interview rescheduled. Clarification regarding the household's living situation was not obtained. The household was not asked if they preferred to reschedule the interview and did not refuse to complete the interview. (MPP 63-300.4 and 63-300.5(j))

### Assessment:

County procedures need improvement as described below.

### Recommendations:

1. Consider reviewing the R&R at the beginning of each interview. This is to ensure households are adequately notified of their rights and responsibilities before going into the full interview.
2. Consider adding the Substantial Lottery or Gambling Winnings Reporting Requirements and Voter Registration information to the R&R recording.
3. Consider removing CW-only forms from the CF intake packets, such as the *State Law Changes Maximum Aid Payment (MAP) Levels for Cash Aid Recipients and New Reporting Requirements for CalWORKS and CalFresh* (TEMP AR 1).
4. Remind staff that food does not need to be stored in separate locations for purchase and prepare to be separate.
5. Encourage staff to leave a voice message when households do not answer on the first attempt to contact for the scheduled interview. This is so that households are aware that the county is attempting to contact them.

### Corrective Actions Required:

1. Ensure that confidentiality is properly maintained by verifying the identity of the household with at least two items of PII prior to disclosing the CF program or purpose of the call. (MPP 19-002.1 and 63-201.34)
2. Ensure that households are properly informed of the Substantial Lottery or Gambling Winnings Reporting Requirements, including the reporting threshold. (ACL 20-142; ACIN I-60-22)
3. Ensure that households are consistently provided with Voter Registration information at intake and recertification interviews. (ACIN I-01-12; ACL 18-39)

**ENCLOSURE**

4. Ensure that applications are correctly screened for ES and eligibility for ES is documented in the case record. Households entitled to ES must be scheduled a timely interview appointment and issued benefits within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11)
5. Ensure that households are informed when an interview is not required after one has already been scheduled and informed.  
(FNS Handbook 310, Section 1340; MPP 63-300.46)
6. Ensure that a timeframe is indicated when income is requested, usually 30 days from the date of application at intake, or 30 days from the recertification application or from the date the CW 2200 form is sent at recertification.  
(7 CFR 273.10(c)(1)(ii); ACL 20-48 and 21-24)
7. Ensure that applicants are allowed the opportunity to participate and complete the scheduled interview. The interview must not be rescheduled, unless requested by the household or sufficient justification is documented. Additionally, an individual's age, alone, does not mandate parental inclusion in the application.  
(MPP 63-300.4 and 63-300.5(j))

**Recertification Process**

**Observations:**

- Recertification cases are processed by the assigned eligibility staff.
- The *Notice of Expiration of Certification* (NEC) is usually mailed to the household the month before the recertification is due. During the week of the ME review, the county had identified a system issue that did not allow the NEC to be sent timely to the household and was working to resolve the issue. (MPP 63-504.25)
- A recertification appointment letter, informing participants of the date and time of the recertification interview, is mailed along with the recertification packet the month before the recertification is due. (ACL 08-29)
- A NOMI is sent to the household after the initial scheduled appointment is missed. (MPP 63-300.46; ACL 08-29)

**Assessment:**

The county has the necessary procedures in place for the timely and accurate processing of recertifications.

**Recommendations:**

None.

**Corrective Actions Required:**

None.

**Website**

**Observations:**

- The county website was reviewed for access to CF benefits. The website, [CalFresh - Department Human Assistance - Sacramento County](#), was found with a simple web search, using keywords: "Sacramento County CalFresh."
- No broken or ambiguous links were found.
- The methods to apply are posted, including, by telephone, in-person, online, mail, and fax. Online application links are available for MyBenefitsCalWIN (MyBCW) and GetCalFresh. (7 CFR 273.2(c)(1))
- The minimum requirements (name, address and signature) to file an application are posted. (MPP 63-300.32)
- The days and hours of operation of the offices and Service center are listed. Locations of in-person offices are posted. (7 CFR 273.2(c)(3)(i))
- Information on ES is posted.
- There are links available to printable applications in English, Spanish, and Russian. (7 CFR 273.2(c)(1)(i))
- The webpage can be translated to various languages with the Google Translation feature.
- There is also information about completing the SAR 7 and Reasonable Accommodations.

**Assessment:**

The county website is user-friendly and provides applicants multiple ways to apply for benefits.

**Recommendations:**

None.

**Corrective Actions Required:**

None.

**Online Applications**

**Observations:**

- The county uses MyBCW and GetCalFresh as online portals that allow potential applicants to inquire about program eligibility, apply for CF benefits, and submit recertifications, SAR 7 and verifications. The county will transition to BenefitsCal in October 2023.
- Online applications are centralized at the Pat Wright Bureau. About 20 to 30 online applications are distributed to each bureau each day to assist with overflow of online applications. The East Commerce Service Center receives ES online applications only.
- Clerical staff file clear, register the application, and schedule the interview in the Service Management And Reporting Tool (SMART).
- At the East Commerce Service Center and Pat Wright Bureau, interview appointments are scheduled timely for ES and non-ES applications.
- All interview appointments at the Susie Gaines Mitchell Bureau are scheduled two to three weeks out. Clerical screen applications and mark ES in SMART, workers screen and attempt cold calls for these applications. However, the interview is not scheduled within the three-day ES timeframe for potential ES applicants who do not answer the cold calls and the interview cannot be waived. (ACL 16-14; ACIN I-14-11 and I-11-20)
- Online applicants are offered telephone or face-to-face (FTF) interview appointments, depending on their preference. The East Commerce Service Center, which is a non-FTF office, schedules FTF interview appointments at the Pat Wright Bureau; however, they are not scheduled within the three-day ES timeframe. The applicants' preferred time is also considered when interview appointments are scheduled at the Pat Wright Bureau.
- There is a recording that covers the R&R and SAR 7 components.
- Applicants are mailed appointment letters. At the East Commerce Service Center and Pat Wright Bureau, online applicants are called to inform them of their interview appointment. A call is made to inform the household of their interview appointment and a voice message is left.
- Secured email notifications are sent via SMART to all online applicants who provide an email address.
- The BDA for online applications do not align with applications received via other modalities. Online applications are accepted until 5:00 pm but the call center and in-person bureaus accept applications until 4:00 p.m. (MPP 63-300.33)

## ENCLOSURE

- Online applicants are provided an informational packet that includes the Sample SAR 7, written explanation on how to complete the SAR 7, and the Voter Registration form and card.
- All online applicants are provided a copy of their application.

### Assessment:

The county has the necessary processes in place to process online applications and provide potential applicants another avenue in which to apply.

### Recommendations:

1. Continue promoting the online application process as the primary method to apply for CF, recertify for benefits and submit a SAR 7. It provides 24/7 access and is a helpful tool in reducing office traffic and wait times.
2. Consider allowing staff the ability to reschedule or request to reschedule the interview for potential ES applications to meet the required timeframes.
3. Remind clerical staff not to mention the CF program when leaving a voice message informing of the interview appointment.
4. Consider having clerical staff document in the case file the calls to inform applicants of their interview appointment.

### Corrective Actions Required:

1. Ensure that the BDA for online applications aligns with applications received through all other methods (telephone, in-person, by mail, via fax). (MPP 63-300.33)
2. Ensure that applications potentially eligible for ES are scheduled an interview appointment within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11 and I-11-20)



**Outreach**

**Observations:**

- Sacramento County continues to promote CF and outreach within the community.
- In the former year, the county conducted outreach at the following events: Afghan Refugee Welcome Center, Ready 4 Robla, The Aloha Festival, Attendance Awareness, Basic Needs Resource Fair, District fun Fair, Rancho Cordova Refugee Resource Fair, Parole and Community Team, Refugee Wellness Fair, and Wide Open Walls.
- At the time of the ME, the county was working on new activities for the next FFY.
- Human Services Specialist (HSS) are out stationed at probation offices, homeless shelters, various schools, the Black Child Legacy Campaign, the One Stop Career Center, and at Jail Diversion. Out stationed HSS collect CF applications, collect recertification applications and SAR 7, and conduct intake interviews.
- The county promotes the CF program through flyers and posters in the office lobbies, through their messaging on their Interactive Voice Response (IVR) system, and through their public-facing webpage.

**Assessment:**

The county continues to identify opportunities to offer CF and improve services.

**Recommendations:**

None.

**Corrective Actions Required:**

None.

**Document Imaging**

**Observations:**

- The county utilizes FileNet to electronically store case documents.
- United States Postal Service (USPS) mail is received daily at the Centralized Mail Center on 5th Street. The items are sorted into mail to be processed in the Centralized Mail Center and mail to be sent to the district offices. District office mail is delivered twice daily.
- There is an exterior and interior drop box at each public office. There is an exterior drop box at the call center. The pickup times vary on location.
- The date of aid is preserved for drop box documents at the Pat Wright Bureau and the East Commerce Service Center. The date of aid is not preserved at the Susie Gaines Mitchell Bureau. The pick-up times do not account for documents picked up prior to the close of business. (7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)
- Documents are also received throughout the day via the fax machine and e-fax.
- Faxed applications are date stamped at the Pat Wright Bureau. Applications are not date stamped at the Susie Gaines Mitchell Bureau and East Commerce Service Center. (7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)
- Office Assistants (OA) at all locations sort mail, scan, image, and index documents, then review the images for validation and quality assurance.
- Online portal documents are automatically added and indexed in FileNet. Unsuccessful documents are re-routed to FileNet by Senior OA at the Centralized Mail Center.
- Documents received over the counter are scanned and returned. A receipt is provided to all.
- Individuals without a permanent address can pick up their mail from the county at any office. If the document cannot be printed from CalWIN, it is held at the Pat Wright Bureau for pick-up for one month.
- Returned mail is processed at the Centralized Mail Center, and it is date stamped for the date received, imaged into FileNet and a case comment is added.
- ES applications are prioritized using the three ES questions on the application.
- HSS provide documents to OA when they are received in FTF interviews.

**Assessment:**

The county continues efforts to image all documents in a timely and efficient manner in order to assist workers in meeting processing timeframes.

**Recommendations:**

1. Consider training OA to review the entire application for ES prioritization.

**Corrective Actions Required:**

1. Ensure that all paper applications received are physically date stamped to record the BDA. (7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)
2. Ensure that applications and documents received from the drop box and fax before the end of business are date stamped for the date received. (7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)

**Customer Service Center**

**Observations:**

- The East Commerce Call Center accepts incoming calls Monday through Friday from 8:00 a.m. to 4:00 p.m. All calls remaining in the call queue after 4:00 p.m. continue to be assisted.
- In-house interpreters are available. Interpreter services are used for all other languages.
- Call center staff accept and process telephone applications. In addition, they process recertifications, SAR 7, and mid-period changes from inbound calls.
- Supervisors possess the ability to do live-call monitoring.
- Staff were courteous and made households feel at ease during calls and interviews.
- Confidentiality was properly maintained. (MPP 63-201.34)
- Coverage of the R&R were consistent. (MPP 63-300.4)
- Coverage of the Substantial Lottery or Gambling Winnings Reporting Requirement was not consistent. (ACL 20-132; ACIN I-60-22)
- Coverage of Voter Registration was not consistent. (ACIN I-01-12; ACL 18-39)
- All the SAR 7 components were consistently covered. The four SAR 7 components are:
  - The verbal explanation of the SAR 7. (MPP 63-300.411)
  - The written explanation for the SAR 7. (MPP 63-300.411)
  - The sample copy of the SAR 7. (MPP 63-300.412)
  - The telephone number which the household can call to ask questions or obtain help in completing the SAR 7. (MPP 63-300.414)
- Appointment letters were sent before the NEC. (MPP 63-504.61(b))
- NOMI was inappropriately sent when attempt to contact the household for their scheduled interview on 7/8/2023 was not documented. The appointment was rescheduled for 7/12/2023. (MPP 63-300.46)
- The interview appointment for the ES-eligible application dated 7/5/2023 was initially scheduled within the three-day ES timeframe but contact with the household was not attempted until 7/12/2023. (ACL 16-14; ACIN I-14-11 and I-11-20)

**Assessment:**

County procedures need improvement as described below.

**Recommendations:**

1. Consider removing the following unnecessary forms from recertification NACF packets: *Notice of New Program Policies* (SAC 2006\_34C) and *Shelter Cost Statement* (CSF 47).
2. Remind staff of mandatory mid-period reporting requirements and related case actions. Address change is not a required mid-period change for CF participation and should only be encouraged.
3. Remind staff to offer CF when in contact with potentially eligible MC recipients and applicants.
4. Consider exploring opportunities to update the R&R audio recording to include the Substantial Lottery or Gambling Winnings Reporting Requirements and threshold in accordance with the annual cost-of-living adjustments (COLA).

**Corrective Actions Required:**

1. Ensure that initial applicants and recertifying households are properly informed of the Substantial Lottery or Gambling Winnings Reporting Requirements and threshold during their interview. (ACL 20-132; ACIN I-60-22)
2. Ensure that households are consistently provided with Voter Registration information at intake and recertification interviews. (ACIN I-01-12; ACL 18-39)
3. Ensure that NEC are sent to recertifying households during the next to last month of the certification period and prior to sending an appointment letter. (MPP 63-504.61(b) and 63-504.251)
4. Ensure that NOMI are only sent to households who have not completed their scheduled interview. (MPP 63-300.46)
5. Ensure that households entitled to ES are scheduled a timely appointment and benefits are issued within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11 and I-11-20)

**Mystery Calls**

**Observations:**

- CDSS made several calls to (916) 874-3100 to inquire about applying for CF benefits.
- Callers that were able to contact a live person experienced extensive wait times as long as an hour. The IVR system indicated an inaccurate wait time for calls that had a hold time that exceeded five minutes.
- Calls dropped or were not able to get through due to the high call volume. Several calls received a call failed error upon dialing the number. (ACIN I-76-20)
- County staff were courteous and professional.
- Methods to apply for CF (in-person, online, by mail) were consistently provided to callers.
- ES process was not consistently explained to callers when requested. (MPP 63-301.521)

**Assessment:**

County procedures need improvement as described below.

**Recommendations:**

1. Consider implementing the use of a script for staff to be able to answer frequently asked questions from potential applicants including all methods to apply.
2. Consider conducting internal mystery calls to evaluate customer service and identify potential training needs.
3. Consider updating the hold music to provide potential applicants program information, including ES information and the methods to apply for benefits.

**Corrective Actions Required:**

1. Ensure that callers are consistently informed of the right to ES, the timeframes for ES, and how to initiate the process. (MPP 63-301.521)
2. Ensure callers are able to reach a live agent, do not experience extensive wait times, and are not required to call back on multiple days. (ACIN I-76-20)

**TIMELINESS OF APPLICATION**

The purpose of the Timeliness of Application section is to assess whether eligibility determinations were made within mandated timeframes.

The scope of the review included the following:

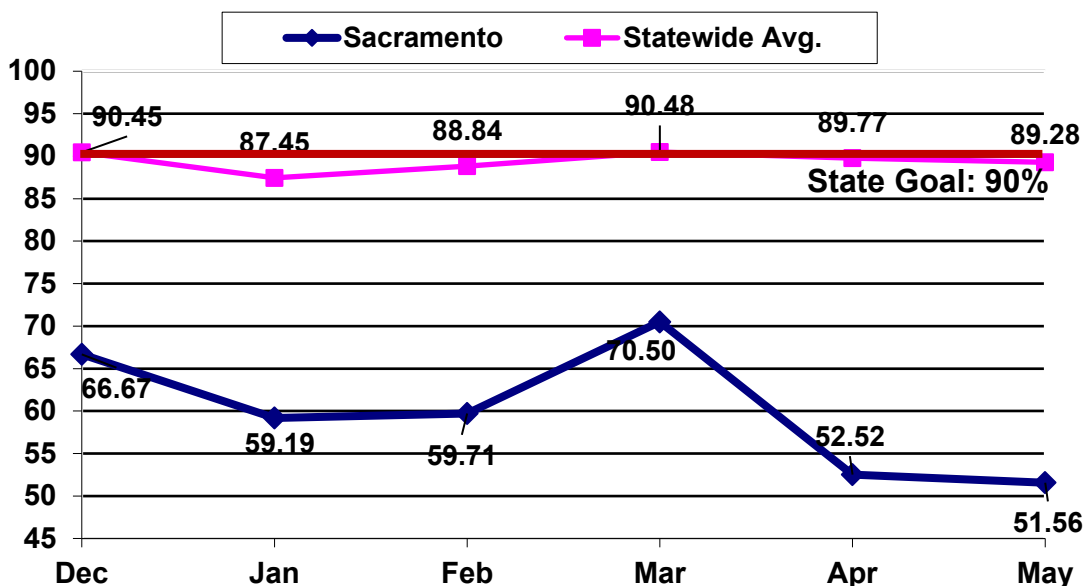
- Three-Day ES – screening procedures and processing for ES.
- Thirty-Day Processing Time – online applications, mail applications, worker controls for timely processing, and processing rate for regular applications.

**Three-Day Processing**

**Observations:**

- The county-reported *CalFresh Monthly Statistical Reports* (CF 296) indicate that for three-day processing, the county is below the State performance goal of 90 percent.
- In the most recent quarter (January 2023 to March 2023), 63.37 percent of applications were processed within the three-day ES timeframe. The graph below provides a monthly comparison between county and State three-day processing rates for the period of December 2022 to May 2023.

**Percent of ES Benefits Issued within Three-days**



**Assessment:**

The county is not meeting the performance goal of 90 percent for three-day ES processing. On December 30, 2019, the county was placed on a Corrective Action Plan (CAP) for three-day ES Application Processing Timeliness. The county provided a response on January 24, 2020, and was provided a reminder letter on March 24, 2023. The CAP will remain in place until the standard has been met for two consecutive quarters. CDSS recognizes that Sacramento County has been met with many challenges that have impacted the county's ability to meet the three-day ES processing timeframes including staffing changes and increase in applications.

**Recommendations:**

1. Continue monitoring three-day ES processing to ensure the county meets the performance goal of 90 percent or above.
2. The county has formally submitted a Timeliness Corrective Action Plan. Continue to implement the plan aimed to improve the three-day ES processing.

**Corrective Actions Required:**

None.

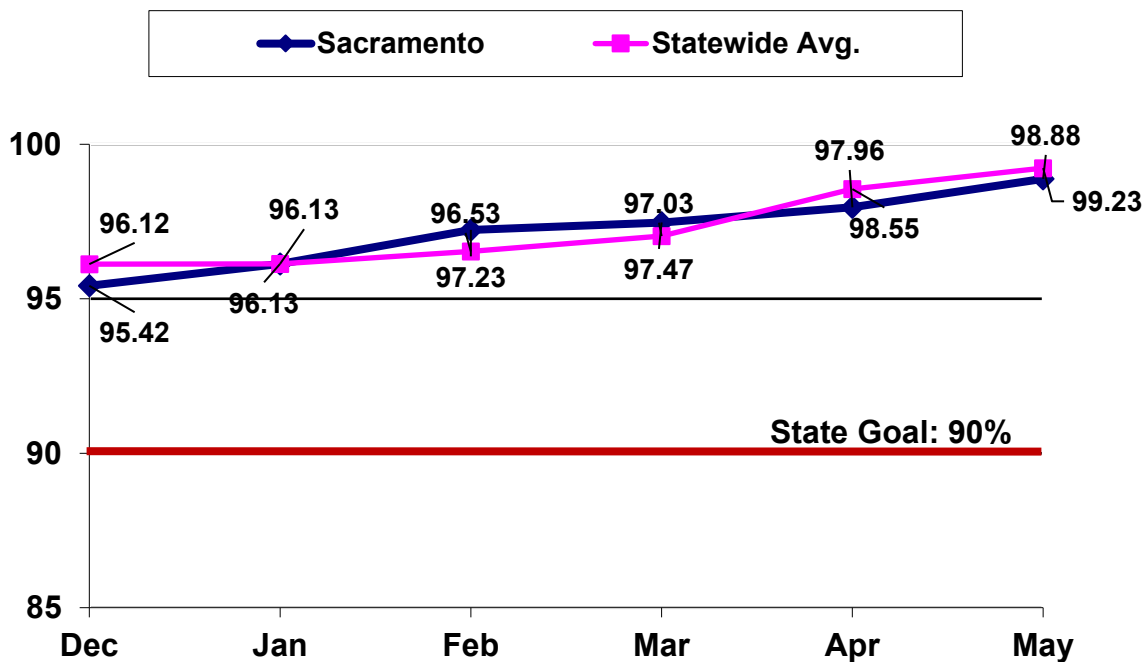


**Thirty-Day Processing**

**Observations:**

- The county-reported CF 296 indicate that for thirty-day processing, the county is meeting the State performance goal of 90 percent.
- In the most recent quarter (January 2023 to March 2023), 96.95 percent of applications were processed within thirty-days. The graph below provides a monthly comparison between county and State thirty-day processing rates for the period of December 2022 to May 2023.

**Applications Approved within 30 days**



**Assessment:**

The county is meeting the State’s performance goal of 90 percent for thirty-day processing.

**Recommendation:**

1. Continue monitoring the timely processing of thirty-day applications to ensure the county maintains the performance goal of 90 percent or above.

**Corrective Actions Required:**

None.

**ABLE-BODIED ADULTS WITHOUT DEPENDENTS (Limited Scope Module for Waived Counties)**

The CDSS conducted a Limited Scope ME of the Able-Bodied Adults Without Dependents (ABAWD) time limit for Sacramento County. This review of ABAWD time limit policy was conducted as a sub-review of Sacramento County ME.

The intent of the Limited Scope ABAWD ME is to assess compliance with ABAWD time limit policy for waived counties and to prepare counties for the long-term impact of ABAWD time limit implementation. The Limited Scope ME will ensure that counties are complying with ABAWD related responsibilities, even while under a time limit waiver, and will help counties prepare for the transition into implementing the ABAWD time limit immediately upon expiration of their time limit waiver.

The FFY 2023 review was conducted using a limited scope module. The limited scope module consists of a limited case review and follow-up discussion with the county. To complete the Limited Scope ABAWD ME, CDSS sampled five random cases from the case sample pulled for the Program Access review. These cases were assessed for compliance with ABAWD policy while under waiver. For FFY 2023, results of the case reviews for the Limited Scope ABAWD ME will be presented as recommendations rather than findings and no corrective action related to ABAWD policy will be required.

The CDSS met with representatives for Sacramento County to discuss the results of the case review. A summary of the results and corresponding recommendations is described in the sections below.

**Summary of Case Reviews:**

The CDSS reviewed a total of five case files selected at random to determine compliance with ABAWD time limit policy. The CDSS review team used a case file review protocol to ensure each case was reviewed in a consistent manner and that all federal requirements were reviewed. The purpose of the case file review was to determine if Sacramento County is processing cases in compliance with federal program requirements. No errors were found on the five cases that were reviewed.

<b>Number of Cases Reviewed</b>	<b>Number of Cases with Errors</b>
5	0

**Findings:**

No findings will be cited for the FFY 2023 Limited Scope ABAWD review.

**Corrective Actions Required:**

No corrective actions will be required for the FFY 2023 Limited Scope ABAWD review.

**Observations:**

Due to conducting a Limited Scope ABAWD ME, no observations were completed.

**Recommendations:**

1. ABAWD time limit training be offered annually to educate staff on ABAWD policy and policy updates. This training should include policy requirements and expectations for ABAWD time limit policy compliance while under waiver.
2. Use the ABAWD three-step process as a best practice in implementing the ABAWD time limit and building the steps into the county's business process. The three-step process includes (1) Identifying ABAWD: identify your target ABAWD population; (2) Screening for Exemptions: screen existing caseload and new applicants for ABAWD status; and (3) Engaging in Work for non-exempt ABAWD, begin early engagement in county workforce opportunities if available.
3. Review the attached ABAWD Readiness Assessment to begin planning for ABAWD implementation to ensure the county is ready to transition off of the waiver.

**SUMMARY OF REQUIRED CORRECTIVE ACTIONS**

**PAYMENT ACCURACY/ASSESSMENT OF CORRECTIVE ACTIONS**

Case Action Reviews

1. Ensure that income, shelter costs, expenses, and deductions are correctly calculated to determine the household's budget. Additionally, verification of all gross non-exempt income must be on file before making an eligibility determination. (7 CFR 273.9(d)(6); MPP 63-502 and 503; ACIN I-45-11; ACL 12-25 and 14-66)
2. Ensure that NOMI are sent to households who fail to complete their scheduled interview. (MPP 63-300.46)
3. Ensure that personal contact is made with households via telephone or, if consent has been provided, text message or electronically before benefits are terminated to remind them that a complete SAR 7 or recertification application is due and attempt to collect the necessary information to complete it. (ACL 21-24; ACIN I-21-22)
4. Ensure that applicants entitled to ES are scheduled timely interview appointments, and benefits are issued within the three-day timeframe from the date of application or date of discovery. (ACIN I-14-11 and I-11-20; ACL 16-14)
5. Ensure that households are provided with services and documents in their preferred primary language. When correspondence cannot be translated, the GEN 1365 must be sent along with the non-translated correspondence. (MPP 21-115.2; ACL 03-56)
6. Ensure that a time period is indicated when income is requested, usually the 30 days from the date of application for intake or 30 days from the recertification application or verification request at recertification. When a different period of income is requested, ensure that case documentation supports such a request. (7 CFR 273.10(c)(1)(ii); ACL 20-48 and 21-24)
7. Ensure that a clear, accurate, and complete CW 2200 form is sent to the household and maintained in the case record when verifications are requested. The CW 2200 form must have the appropriate program boxes marked, and must not request verifications that are not required for the CF program or not mandatory and not questionable. (7 CFR 273.9(c)(17), 273.9(d)(4) and 273.9(d)(5); MPP 63-502.2(p)(5); ACL 14-26, 18-20, 21-93 and 22-45; ACIN I-54-22)
8. Ensure that applications submitted are saved in the case file. When the telephonic signature is utilized, ensure the audio recording is saved in the case file or the telephonic signature waiver requirements are met. (7 CFR 273.14(b)(2); ACL 14-101; ACWDL issued April 2, 2020 and March 28, 2023)

**ENCLOSURE**

9. Ensure that the date the application is received is physically recorded on the application. (7 CFR 273.2(c)(1)(iv); MPP 63-300.33)
10. Ensure that NACF households are only required to sign one application. The telephonic signature is sufficient to begin the application process and an additional signature is not required. (7 CFR 273.2(a)(1); ACL 13-96 and 15-84)
11. Ensure that recertification interviews are not scheduled for ESAP households unless it is requested by the household, the recertification application is going to be denied, or the information supplied is questionable, incomplete or contradictory. (ACL 20-145)
12. Ensure that notices sent to households are accurate, clear, and support eligibility factors. Also, postponed verification(s) must not be listed on the NOA unless required for the CF program or documented as questionable, and requested using a CW 2200 form. (MPP 63-301.54 and 63-504.22)
13. Ensure that case documentation is accurate, sufficient and available in the case record to support case actions. Discrepant or contradictory information, such as student status, temporary or permanent absence from the home, and employment information, must be clarified and documented in the case file. (FNS Handbook 310, Section 1310; 7 CFR 273.2(f)(6); MPP 63-300.5(j))
14. Ensure that R&R are reviewed with applicants and recertifying households during their interviews. Also, households entitled to ESAP must not be informed to provide a SAR 7 during the ESAP waiver from 3/1/2022 through 9/26/2026. (MPP 63-300.4; ACL 20-145 and 22-15)
15. Ensure that confidentiality is properly maintained by obtaining verbal or written authorization from households prior to disclosing case sensitive information to non-household members. (MPP 19-002.1, 63-201.3 and 63-402.6; ACL 19-55)
16. Ensure that households receive timely and adequate notice for negative actions. (FNS Handbook 310, Section 1310 and 1350.2; MPP 63-504; ACL 21-93)
17. Ensure that the BDA is correctly preserved based on the date the application was filed. The original BDA must be preserved when households who fail to complete their initial scheduled interview make contact within 30 days from the date of application. (MPP 63-300.33 and 63-300.46)
18. Ensure that negative actions taken are correct, accurate and consistent with the case record. Also, NOA must be sent with the correct reason(s) listed to accurately inform households of the reason(s) the negative action is/are taken. (FNS Handbook 310, Section 1350.2; MPP 63-300.4, 63-300.5(a)(1), 63-504.2 and 63-504.6; ACL 19-10, 20-08 and 21-93)

Second Party Reviews

None.

Quality Control

None.

Training

None.

**PROGRAM ACCESS**

Customer Service

1. Ensure that potential applicants are informed of all the methods to apply for CF (telephone, in-person, online, by mail, and via fax) when they inquire about applying for CF. (MPP 63-300.3)
2. Ensure that households are provided timely, accurate, and fair service to participate in the CF program. (MPP 63-205.21; 7 CFR 273.2(a)(1) and 273.2(c)(2)(i))
3. Ensure that an eligibility determination is not held for information from a SAVE query when other valid verification is on file. (ACIN I-45-11 and I-65-11)
4. Ensure that households can obtain services at certification sites during the regular hours of operation. (MPP 63-205.21 and 63-300.38; ACIN I-83-21)
5. Ensure that applicants and recipients PII is safeguarded by not requesting it out loud in the lobby and by covering or securing documents. (MPP 19-002.1 and 63-201.34)

Interview Observations

1. Ensure that confidentiality is properly maintained by verifying the identity of the household with at least two items of PII prior to disclosing the CF program or purpose of the call. (MPP 19-002.1 and 63-201.34)
2. Ensure that households are properly informed of the Substantial Lottery or Gambling Winnings Reporting Requirements, including the reporting threshold. (ACL 20-142; ACIN I-60-22)
3. Ensure that households are consistently provided with Voter Registration information at intake and recertification interviews. (ACIN I-01-12; ACL 18-39)
4. Ensure that applications are correctly screened for ES and eligibility for ES is documented in the case record. Households entitled to ES must be scheduled a

## ENCLOSURE

timely interview appointment and issued benefits within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11)

5. Ensure that households are informed when an interview is not required after one has already been scheduled and informed.  
(FNS Handbook 310, Section 1340; MPP 63-300.46)
6. Ensure that a timeframe is indicated when income is requested, usually 30 days from the date of application at intake, or 30 days from the recertification application or from the date the CW 2200 form is sent at recertification.  
(7 CFR 273.10I(1)(ii); ACL 20-48 and 21-24)
7. Ensure that applicants are allowed the opportunity to participate and complete the scheduled interview. The interview must not be rescheduled, unless requested by the household or sufficient justification is documented. Additionally, an individual's age, alone, does not mandate parental inclusion in the application.  
(MPP 63-300.4 and 63-300.5(j))

### Recertification Process

None.

### Online Applications

1. Ensure that the BDA for online applications aligns with applications received through all other methods (telephone, in-person, by mail, via fax). (MPP 63-300.33)
2. Ensure that applications potentially eligible for ES are scheduled an interview appointment within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11 and I-11-20)

### Outreach

None.

### Document Imaging

1. Ensure that all paper applications received are physically date stamped to record the BDA. (7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)
2. Ensure that applications and documents received from the drop box and fax before the end of business are date stamped for the date received.  
(7 CFR 273.2(c)(1)(iv)); MPP 63-300.33)

### Customer Service Center

**ENCLOSURE**

1. Ensure that initial applicants and recertifying households are properly informed of the Substantial Lottery or Gambling Winnings Reporting Requirements and threshold during their interview. (ACL 20-132; ACIN I-60-22)
2. Ensure that households are consistently provided with Voter Registration information at intake and recertification interviews. (ACIN I-01-12; ACL 18-39)
3. Ensure that NEC are sent to recertifying households during the next to last month of the certification period and prior to sending an appointment letter. (MPP 63-504.61(b) and 63-504.251)
4. Ensure that NOMI are only sent to households who have not completed their scheduled interview. (MPP 63-300.46)
5. Ensure that households entitled to ES are scheduled a timely appointment and benefits are issued within the three-day timeframe from the date of application or date of discovery. (ACL 16-14; ACIN I-14-11 and I-11-20)

**Mystery Calls**

1. Ensure that callers are consistently informed of the right to ES, the timeframes for ES, and how to initiate the process. (MPP 63-301.521)
2. Ensure callers are able to reach a live agent, do not experience extensive wait times, and not required to call back on multiple days. (ACIN I-76-20)

**TIMELINESS OF APPLICATION**

**Three-Day Processing**

None.

**Thirty-Day Processing**

None.

**ABAWD – LIMITED SCOPE MODULE FOR WAIVED COUNTIES**

**Case Reviews**

None.

**Observations**

None.