

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

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



August 24, 2023

Ethan Dye, Director Department of Human Assistance 1825 Bell St STE 200 Sacramento, CA 95825

Dear Mr. Ethan Dye,

The purpose of this letter is to provide findings from the Refugee Programs Bureau (RPB) review of the Sacramento County Department of Human Assistance administration and operation of the Refugee Cash Assistance (RCA) and Refugee Social Services (RSS) programs.

The RPB conducted the review on June 12-26, 2023 and submitted preliminary findings to Sacramento County on June 14 and 27. The RPB is issuing this report for RCA and RSS after reviewing additional documentation provided by Sacramento County. The RPB has identified four findings regarding RCA and requests Sacramento County submit a Corrective Action Plan within 30 days of this report date addressing the findings. For each finding listed, specific measures should be identified that will be taken to prevent the recurrence of identified problems, including a reasonable timeframe for correction.

Thank you again for the cooperation that you and your staff extended during the RCA and RSS review process. Should you have any questions about the review findings, please email us at RPBQAU@dss.ca.gov.

Sincerely,

Original Document Signed By:

NAZIA ALI, Chief

Quality Assurance and Training Engagement Section Refugee Programs Bureau State Refugee Housing Coordinator California Department of Social Services

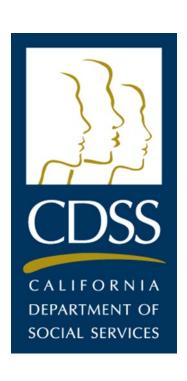
Enclosures

c: Michelle O'Camb, Sacramento County Refugee Coordinator

c: Isabel Arriaga Zeuthen, CalWORKs/RCA/HSP Program Specialist

State of California Department of Social Services Quality Assurance Case Review County Monitoring Report Calendar Year 2023

Sacramento County Department of Human Assistance



Program Background

After three years, the California Department of Social Services (CDSS), Refugee Programs Bureau (RPB) re-launched quality assurance county monitoring in Calendar Year (CY) 2023 across California's refugee-impacted counties and Refugee Support Services (RSS) providers. To enhance capacity and best accomplish federal and state mandates, the RPB appointed the newly formed Quality Assurance Unit (QAU) to lead statewide quality assurance monitoring to ensure county and service provider compliance with the Refugee Resettlement Program's rules and regulations. In partnership with County Welfare Departments (CWDs), the RPB's goal is to strengthen the results-oriented quality assurance monitoring and evaluation function and capacity within RPB for improving programs and policies, organizational learning, and accountability within CWDs and RSS providers. Additional ways in which the RPB's quality assurance monitoring process aims to achieve the goals listed above include, but are not limited to the following:

- RSS COVID-19 Funding: On October 28, 2020, in response to the hardship imposed by the COVID-19 pandemic, RPB allocated \$717,359 Refugee Support Services (RSS) supplemental funding to Sacramento County to provide direct relief and assistance for emergency services such as housing, utility, and other assistance to the eligible populations impacted by the COVID-19 pandemic. This year, we are planning to review RSS COVID-19 funding-related activities to ensure the program was effective and program requirements were met during the implementation.
- **Equity Lens:** Equity is at the center of our operations at CDSS. It is our goal to provide equitable services to all our recipients across all programs. Since CWDs are an extension of CDSS at the county level, we have added equity-related questions to the county and service providers pre-monitoring questionnaires to make sure county and service providers are considering equity and providing equitable services to our clients.
- **Best Practices:** It's our goal to use the quality assurance monitoring process not only for compliance but also for identifying best practices and communicating them to partner CWDs. We have added additional questions to the questionnaire to gather information about best practices that could make informed decisions for future programs.
- **New Populations:** Monitoring tools were updated to reflect our new eligible populations including the Afghan and Ukrainian Humanitarian Parolees and the policies associated with their eligibility.

The RPB acknowledges the difficulties encountered by various counties, including Sacramento County, during Operation Allies Welcome (OAW). These challenges

involved adapting to rapidly changing policies and procedures provided by the federal Office of Refugee Resettlement. The RPB expresses gratitude for the collaborative efforts with Sacramento County's Department of Human Assistance in successfully conducting a county monitoring review for Refugee Cash Assistance (RCA) and RSS programs' quality assurance in CY 2023. We are truly grateful for the partnership and collaborative spirit exhibited by Sacramento County, as together we strive to create a more inclusive and supportive environment for all.

Quality assurance case review monitoring methodology, findings, key highlights, and suggested recommendations are listed below in the body of this report.

Purpose of the Evaluation

In order to enhance our capacity and best accomplish our mandates, RPB has gone through reorganization and created a new section of Quality Assurance and Training Engagement (QATE). Within the QATE Section, you will find the newly formed QAU, which provides statewide monitoring to ensure county and service provider compliance with the Refugee Resettlement Program's rules and regulations.

In partnership with CWDs, our goal is to strengthen the results-oriented monitoring and evaluation function and capacity in RPB, for improving programs and policies, organizational learning, and accountability within CWDs and RSS providers. We also hope to continue to provide the technical assistance and resources needed to achieve this goal. The purpose of monitoring and evaluation is to accomplish each of the following points:

- Identify areas of improvement in the implementation of program policy and make necessary adjustments
- Identify best practices and innovations
- Support decision-making
- Problem-solving
- Beneficiary satisfaction
- Accountability

Methodology

- The RPB's QAU conducted a quality assurance case review county monitoring of the Sacramento County Department of Human Assistance administration and operation of RCA and RSS programs pursuant to <u>Title 45 of the Code of Federal Regulations</u>, <u>Part 75.342</u>. Sacramento County's adherence to program requirements was evaluated in the following areas, which are described in detail in the <u>Manual of Policies and Procedures</u>, <u>Chapter 69-200</u>, and the <u>County Refugee Program Guidelines</u> (revised June 2023)
 - Documentation of case record information

- Verification of eligibility and, for RCA clients, timely registration for/participation in activities
- Priority in the provision of services
- Timeliness of Notices of Action
- Eligible employability services
- Criteria for employability services and employment
- Family self-sufficiency plans
- Adherence to the RSS 60-month time limitation for services

The quality assurance case review county monitoring was conducted in person from June 12-26, 2023. Sacramento County uploaded missing documents for some of the case file documents to the external SharePoint site that was developed by RPB for monitoring. The QAU was also given access to the California Work Opportunity and Responsibility to Kids Information Network (CalWIN) system to review RCA cases. Sixty (60) RCA cases were selected for review that were either active, denied, or discontinued between January 1, 2022 – December 31, 2022. One hundred twelve (112) RSS cases were selected for review, which were served by the Sacramento County RSS Service Providers and include the Twin River Unified School District, Sacramento City Unified School District, Lao Family Community Development Inc., International Rescue Committee, Folsom Cordova Community Partnership, Elk Grove Unified School District, Folsom Cordova Unified School District, Bach Viet Associations Inc., and Asian Resources Community Services. General findings from the total of 172 reviewed RCA and RSS cases as well as suggested recommendations are listed in the following sections of this report.

Review Findings

Refugee Cash Assistance Case Review and Findings

The RCA cases were reviewed for documentation of appropriate immigration documents to verify eligibility, timeliness of Notices of Action (NOA), referral to employment services, and reporting requirements. The summary of the review findings of RCA cases is as follows:

- 1. Eligibility was not determined within 30 days of the application.
- 2. Termination NOA was sent less than 10 days in advance.
- Lack of Social Security Number explanation on file.
- 4. RCA was paid for more than 12 months from the date of eligibility.

Findings Details:

1. Eligibility was not determined within 30 days of application

Cases: 1BBTR89, 1BBS147, 1BBNF04, 1BBQF79, 1BBQL96, 1BBQR93, 1BBMW08, 1BC0T09, 1BBQD13, 1BBQF85, 1BBNV12, 1BBXV85, 1BC9N66, 1BC2763, 1BBQR03, 1BBQ935, 1BBP969, 1BCCZ92

Policy or Regulatory Reference: MPP 69.205.21 - The eligibility of each RCA applicant shall be determined as promptly as possible within no more than 30 days from the date of application.

County Action Needed: The county must provide training and/or written guidance to county staff to ensure that eligibility determination for RCA benefits is made as soon as possible within no more than 30 days from the date of application.

2. Termination NOAs were sent less than 10 days in advance.

Cases: 1BBTR89, 1BC7N01

Policy or Regulatory Reference: MPP 69-210 Notices shall be sent or provided to a recipient at least 10 days before the date upon which RCA will be reduced, suspended, or terminated.

County Action Needed: The county must ensure the proper issuance of NOAs and that proper notification regarding any action taken by the county is provided to clients in a timely manner. The county must provide training and/or written guidance to county staff to ensure RCA reduction, suspension, or termination NOAs are sent at least 10 days in advance.

3. Lack of Social Security Number explanation for cases that had SSN on file.

Cases: 1BBVG48, 1BBYQ87, 1BBTR89, 1BBWD41, 1BC9M48, 1BBS147, 1BBSH38, 1BBQR93, 1BBM677, 1BBMW08, 1BC0F37, 1BC1K07, 1BBNV12, 1BBXN32

Policy or Regulatory Reference: MPP 69-205.22, SL 00-23, MPP 69-205.221, RCL 06-17- Counties may request that an applicant voluntarily provide his or her social security number but the reason for its use must be explained to the applicant and documented in the case files. In some situations, like employment services, where social security numbers are required, counties may choose to develop a specific form to be used for this purpose. If counties decide to develop a form, it must be included in the case file.

County Action Needed: The county must provide written guidance and/or training to appropriate staff to ensure documentation that an RCA applicant has been informed that the disclosure of his/her SSN is voluntary and told how the county will use the number even if the applicant is applying for other programs.

4. RCA was paid for more than 12 months from the date of eligibility.

Cases: 1BBVQ75

Policy or Regulatory Reference: MPP 69-202.41, MPP 69-205.241 ACWDL 5.27.22 Eligibility for RCA is limited to the number of months required in Section 69-202.41

following the refugee's date of entry into the United States. For recipients who became eligible for RCA/ECA and TCVAP on or after October 1, 2021, CWDs must provide uninterrupted cash aid until the 12-month time limit is exhausted, or until the recipient is no longer eligible, whichever is earlier.

County Action Needed: The county must provide written guidance and/or training to appropriate staff ensuring their comprehension of the maximum allowable duration for receiving aid under RCA, which is limited to a period of 12 months.

Observation Details:

1. Date of Eligibility for Afghan Humanitarian Parolees:

During the review, RPB's QAU discovered several instances of Afghan Humanitarian Parolee (AHP) cases where there was a considerable gap of several months between the eligibility and application dates. This time gap appears to be due to the clients being stationed in military bases (Safe Havens) while awaiting resettlement. It is assumed that the county may have considered the date of parole as the date of eligibility instead of the date of entry into the community.

Eligibility for AHP extends from either October 1, 2021, or the date the AHP entered the community in the United States, whichever is later. Considering this observation, the RPB recommends that the county proactively communicate with clients in similar situations to ascertain the possible reasons for the delay in applying for aid and make necessary adjustments as appropriate.

2. Termination Notices of Action were not on file.

Additionally, the QAU noted the absence of Termination NOA in the files for review. QAU strongly urges the county to diligently maintain comprehensive documentation, including the NOAs, in their case records.

Refugee Support Services Case Review and Findings:

RSS cases were reviewed for documentation of immigration documents to verify eligibility, priority in provision of services, allowable services, employment documentation, retention follow-up, family self-sufficiency plans, and adherence to the RSS 60-month time limitation for services. The summary of the observation of RSS cases is as follows:

Observation Details

Documentation for client employment: During the review, RPB's QAU discovered

some instances of incomplete paperwork and lack of documentation for employment. QAU strongly urges the county and their RSS service providers to diligently maintain comprehensive documentation, including the employment documentation, and or pay stubs, in their case records. Case workers should document in case notes if clients are not willing to provide such documentation.

Service Providers Interviews

The RPBs QAU developed a service provider questionnaire to gather feedback from service providers regarding current and best practices and to better monitor and evaluate service providers. There are 12 open-ended questions which cover the types of services provided by the service providers, processes and procedures, documentation, success and challenges, and coordination with RPB and Sacramento Employment and Training Agency (SETA). QAU interviewed 17 staff members from Twin River Unified School District, Sacramento City Unified School District, Lao Family Community Development Inc., International Rescue Committee, Folsom Cordova Community Partnership, Elk Grove Unified School District, Folsom Cordova Unified School District, Bach Viet, and Asian Resources, who shared their experiences and thoughts on how to enhance coordination and serve the most vulnerable section of our community.

Success Stories

Despite all the challenges associated with the COVID-19 pandemic and the influx of refugee arrivals from Afghanistan and Ukraine, Sacramento County was able to provide RCA and RSS for eligible clients in a timely manner. In response to the large influx of newcomers arriving at the same time, SETA was able to establish a partnership with nine service providers, to provide additional services, especially for the clients who were walk-ins and didn't have case management help through resettlement agencies.

Throughout the interviews conducted with service providers, numerous success stories came to light, showcasing how Sacramento County and its service providers collaborated to help refugees secure their desired jobs, establish their own businesses, and achieve self-sufficiency. These efforts have empowered refugees to become self-sufficient and thrive in their new lives.

Sacramento County and SETA played a crucial role in assisting numerous refugees in acquiring essential job-hunting skills, and successfully navigating the competitive job market to secure their desired employment. As a result of these efforts, many refugees became self-sufficient and actively contribute as valued members of the community.

During our review, we heard about a client's remarkable journey where an Afghan refugee had numerous challenges during her journey, as she had limited resources and U.S. work experience. Despite all these challenges, she kept a positive attitude and believed in herself, and strived to be the best she could be. She worked hard and achieved greatness through her education journey with the support of Folsom Cordova Unified School District and then she was referred to and hired by Folsom Cordova

Community Partnership. She now works with Folsom Cordova Community Partnership as a case worker and serves other refugees to obtain employment and become self-sufficient.

Conclusion

RPB extends our gratitude for the expertise and dedication Sacramento County brings to the refugee welfare assistance programs it administers and to the provision of time-sensitive support to our newcomer communities in California. Sacramento County staff were very welcoming, supportive, responsive, and receptive to the new information and feedback. QAU is thankful for their efforts to access case file documents and the benefits system.

The QAU findings listed in this report require corrective action. To indicate how it will prevent the identified problems from recurring in the future, the county must submit a Corrective Action Plan (CAP) within 30 days from the date of this report that specifies the steps it has taken to implement the corrective measures noted under "County Required Action" section under each finding. Copies of written guidance and/or training material, as well as documentation of training, such as dates, attendees, and location, should be included in the CAP.