



PAT LEARY  
ACTING DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



GAVIN NEWSOM  
GOVERNOR

May 1, 2019

ALL COUNTY WELFARE DIRECTORS LETTER (ACWDL)

TO: ALL COUNTY WELFARE DIRECTORS

FROM: TODD R. BLAND, Assistant Director  
Automation, Integrity, and Client Initiatives Branch

SUBJECT: SEPARATION OF SPECIAL INVESTIGATIVE UNIT (SIU) AND  
ELIGIBILITY DETERMINATION FUNCTIONS

The purpose of this ACWDL is to remind County Welfare Departments (CWDs) of the requirement to maintain separation between management of eligibility determination and program integrity investigation.

**Background**

County Eligibility Workers (EW) maintain program integrity by making accurate benefit determinations in the California Work Opportunity and Responsibility to Kids (CalWORKs) and CalFresh programs pursuant to Manual of Policies and Procedures (MPP) Section [11-501.1](#). When reasons exist to suspect fraud, EWs are responsible for referring cases to the county Special Investigative Unit (SIU) staff ([MPP Section 20-004.1](#) and [MPP Section 20-005.3](#)).

The county SIU staff are responsible for preventing and discovering fraudulent actions by applicants and recipients. They must take prompt and decisive steps to investigate and establish evidence where clients are attempting to fraudulently obtain or receive benefits. When evidence dictates, the CWD must refer the case for administrative action or prosecution ([MPP Section 20-005.1](#)).

## **Requirement**

Per [MPP section 20-007.21](#), the SIU shall be a separate organization, independent of organizations performing eligibility and benefit determination functions. CWDs must ensure separation and independent operation of both eligibility and investigation activities. CWDs must ensure staff performing intake, redetermination, and recertification activities, answer to eligibility management. CalWORKs and/or CalFresh eligibility managers cannot direct or manage investigation activities. SIU staff cannot answer to eligibility management overseeing CalWORKs and/or CalFresh programs. SIU staff cannot dictate CalWORKs and/or CalFresh eligibility decisions but can make eligibility recommendations. All benefit determination questions and concerns must be directly addressed by eligibility staff.

The California Department of Social Services (CDSS) evaluates organizational structures of county SIUs for compliance, pursuant to MPP Section 20-007.21 and [MPP Section 20-009](#). This is accomplished through periodic SIU reviews performed by the CDSS Program Integrity Bureau.

Upon request CWDs must provide an organizational chart to CDSS.

If you have any questions, please contact Niall Stahl, Welfare Fraud Prevention Coordinator, at (916) 651-3993.