

June 10, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 20-59

This letter provides instructions for complying with Temporary Assistance for Needy Families and Work Incentive Nutritional Supplement validation review Corrective Action Plans established by the federal Health and Human Services, Administration for Children and Families Division for the California Department of Social Services.



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

June 10, 2020

ALL COUNTY LETTER NO. 20-59

TO: ALL COUNTY WELFARE DIRECTORS
ALL CALWORKS PROGRAM SPECIALISTS
ALL WELFARE-TO-WORK COORDINATORS
ALL CALFRESH PROGRAM SPECIALISTS

SUBJECT: TEMPORARY ASSISTANCE FOR NEEDY FAMILIES AND WORK
INCENTIVE NUTRITIONAL SUPPLEMENT VALIDATION REVIEW
CORRECTIVE ACTION PLANS

The purpose of this All County Letter (ACL) is to provide County Welfare Departments (CWDs) with instructions for complying with Temporary Assistance for Needy Families (TANF) and Work Incentive Nutritional Supplement (WINS) validation review Corrective Action Plans (CAPs) required by the federal Health and Human Services, Administration for Children and Families Division and the California Department of Social Services (CDSS). In order to meet reporting requirements, effective federal fiscal year (FFY) 2020, CWDs will be required to submit CAPs following TANF and WINS validation reviews.

BACKGROUND

To comply with California's Work Verification Plan, Federal regulations require that CDSS' Performance Monitoring Unit (PMU) verifies CWD's work participation rate (WPR) processes and procedures and data reported in the Research and Development Enterprise Project (RADEP) and Enterprise II Lite (E2Lite) systems.

The PMU reviews Performance Measurement Counties (PMCs) every three years and non-PMCs every two years. The TANF and WINS cases that PMU reviews are pulled from RADEP and E2Lite for FFYs that are closed and can no longer be modified. Any system or procedure modifications made by CWDs due to validation review findings should be implemented in the calendar year of the validation review, not the FFY that was reviewed.

Following a validation review, a Report of Findings is sent to the CWD that lists any errors or discrepancies PMU verified during the review. Error cases are those that should not have been reported as excluded or were reported as meeting the All Families WPR, but PMU determined the cases did not meet the WPR. Discrepancies are cases that were either reported as meeting or not meeting the WPR, and PMU agreed but did not verify the same number of reported hours or, for excluded cases, the reasons for the exclusions were incorrect.

Beginning in 2019, reviewing FFY 2017, a procedures question was added to the pre-review survey asking if the CWD had made any system or procedure modifications due to findings from a previous validation review. If no modifications were made, PMU confirms that previous reviews did not require modifications. If modifications were made, PMU confirms the CWD implemented, or is in the process of implementing, the changes.

NEW CORRECTIVE ACTION PROCESS

Prior to TANF and WINS validation reviews, CWDs will still be required to answer the procedure question regarding modifications made due to previous review findings. Following a validation review, a Report of Findings will still be issued listing errors and/or discrepancies.

Effective FFY 2020, reviewed in 2022, the Report of Findings will include an Attachment "C" that will list any errors and/or discrepancies. The CWDs will use Attachment "C" to describe how the errors and/or discrepancies will be corrected/addressed, record the date the correction will be implemented, and then return the CAP to PMU. The PMU will confirm that corrective actions listed on Attachment "C" were implemented when the CWD is reviewed again two or three years later. Refer to the enclosed Attachment "A" for an example of a Report of Findings, Attachment "B" that describes the codes and acronyms used in the Report of Findings, and Attachment "C" for an example of a CAP.

If you have any questions regarding this new CAP process, please contact Kim Murdock at (916) 657-2595 or kim.murdock@dss.ca.gov. Thank you.

Sincerely,

Original Document Signed By:

M. AKHTAR KHAN, Ph.D.
Chief, Research Services Branch

Enclosures

REPORT OF FINDINGS – [County Name] – [Month Year]

The California Department of Social Services' (CDSS') Performance Monitoring Unit reviewed 120 Temporary Assistance for Needy Families (TANF) and 12 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") followed by the WINS findings, also divided into the same three categories. Please refer to Attachment "B" for code and acronym descriptions included in this report and to Attachment "C" that your county will use to list corrective actions and implementation dates.

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 reasons for the exclusions were incorrect.

The findings for TANF cases revealed 112 accurate, 5 error, and 3 discrepancy cases.

TANF FINDINGS**Error Cases**

Finding	Review #	Case #	Case Type	Activity	Hours Reported	Hours Verified	Doc. Code	Documentation Dates
1	G01039	1234567	1	UE	24	5	1	01/01-01/28/18
2	H10025	8901234	3	UE	12 – A1 37 – A2	12 - A1 0 - A2		
9	H02004	5678901	3	SPRIV	25 – A1 5 – A1	25 - A1 3 - A1	2	02/18
12	G01060	2345678	1	JS	31	0		

Excluded Error Case

Finding	Review #	Case #	Case Type	Reported Reason for Exclusion
3	G10024	9012345	4	Child less than 12 months

Discrepancy Cases

Finding	Review #	Case #	Case Type	Activity	Hours Reported	Hours Verified	Doc. Code	Documentation Dates
2	H01040	6789012	3	UE	5 – A2	0		
9	H11003	3456789	3	UE JS	34 – A2 2 – A2	30 – A2 2 - A2	1	10/29-11/25/17
14	G07044	0123456	1	SPUB JS	21 20	21 10	2	07/18

WINS FINDINGS

The preliminary findings for WINS cases revealed 10 accurate, 1 error, and 1 discrepancy case.

Error Case

Finding	Review #	Case #	Case Type	Activity	Hours Reported	Hours Verified	Doc. Code	Documentation Dates
1	V01039	7890123	1	UE	24	6	1	01/01-01/28/18

Discrepancy Case

Finding	Review #	Case #	Case Type	Activity	Hours Reported	Hours Verified	Doc. Code	Documentation Dates
9	U10036	4567890	2	UE	39	40	1	09/11-09/25/18

CODE AND ACRONYM DESCRIPTIONS

Finding 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	Projected for more than six months, or did not use most recent hours
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	Did not deduct expenses or divide by fed minimum wage for self-employment
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
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	TANF only – averaged earnings statements prior to calculating weekly hours
24	WINS only - Used WINS proxy to calculate hours
25	Did not report excess Work Experience or Community Service hours in Other

Case Type 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 Acronym	Activity Description
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

Documentation Code	Documentation Description
1	Earnings statement
2	Attendance record
3	Timesheet
4	The Work Number
5	Employer verification
6	Activity sheet
7	Sworn statement
8	Consortia

FFY 2020 Corrective Action Plan

County Name: California County
Date: May 18, 2022
Due Date: June 18, 2022

For each finding below, please describe the corrective actions your county will take and the date the corrective actions will be implemented. Send the completed Corrective Action Plan to the Performance Monitoring Unit (PMU) at WPR_PMU@dss.ca.gov by the above due date. Contact PMU Analyst at [phone number] if you have questions.

Finding	Corrective Action by County	Planned Implementation Date
Reported monthly instead of weekly hours	Ensure county staff are trained to divide monthly hours by 4.33 before reporting them in E2Lite and add instructions to the policy manual.	08/01/22
Documentation in case file did not support reported hours	Add quality control processes to the electronic filing instructions and provide training to ensure consistent filing of documentation.	08/01/22
Documentation in case file was missing required information	Case manager will ensure attendance sheets are accurate and complete before signing.	05/18/22
Should not have been excluded/disregarded, or incorrect reason for exclusion	Case manager will confirm that the 12-month exclusion hasn't been used. If it has, case manager will comment in the case file how many months were used and for which child.	05/18/22
Exceeded time limits for Job Search/Job Readiness or Vocational Education	Currently using an Access database to track time limits. Will start using consortium to track time limits and ensure staff are trained properly.	08/01/22