



CDSS

JOHN A. WAGNER
DIRECTOR

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

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



ARNOLD SCHWARZENEGGER
GOVERNOR

April 19, 2010

ALL COUNTY INFORMATION NOTICE NO.I-36-10

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY WELFARE TO WORK COORDINATORS

SUBJECT: WORK PARTICIPATION RATE (WPR) VALIDATION REVIEWS

<u>REASON FOR THIS TRANSMITTAL</u>	
<input type="checkbox"/>	State Law Change
<input type="checkbox"/>	Federal Law or Regulation Change
<input type="checkbox"/>	Court Order
<input type="checkbox"/>	Clarification Requested by One or More Counties
<input type="checkbox"/>	Initiated by CDSS

This notice is to provide information on the validation reviews for county WPR data. The Deficit Reduction Act of 2005 required states to comply with new regulations regarding the Temporary Assistance to Needy Families block grant. Specifically, the Interim Final Rule which was issued on June 29, 2006, required states to submit a Work Verification Plan (WVP) that addressed each state's definitions of federally-countable work activities, procedures for verification of participation hours, definition of a work-eligible individual, and a description of internal controls to ensure compliance with the procedures established in the WVP.

California's initial WVP, which was approved by the federal government and became effective on October 1, 2007, states the California Department of Social Services (CDSS) will:

- Perform county-level reviews and analysis of data collection processes, including the county's automated system to determine if data collection complies with the state's approved WVP;
- Conduct case validation reviews of work participation findings for individual cases. Sampled cases will be reviewed to determine whether the data was collected in accordance with the approved plan and meets federal and state wage or activity participation reporting requirements; and

- Provide technical assistance to counties to ensure the accuracy of work participation data reported to the ACF.

CDSS has worked with the California Welfare Directors Association (CWDA) and counties to develop the processes for these on-site reviews, which will begin in April 2010. The process includes the following steps:

- CDSS will contact each county to determine specific review dates;
- CDSS will send a contact letter confirming the review date, describing the review process, and requesting information describing the county's documentation and data collection procedures;
- A sub-sample will be provided to the county at least one week in advance of the review. The sub-sample will consist of cases in the numerator, in the denominator but not in the numerator and those excluded from the denominator;
- An entrance and exit meeting will be conducted;
- A written report will be sent to each county. The review outcome data will be used to validate the accuracy of the reported WPR data and to comply with federal requirements; and
- An opportunity will be provided for the county to dispute any findings it disagrees with.

Attached are questions and answers for the reviews, which were developed after meetings with CWDA. CDSS is currently working with CWDA to develop a schedule for the county visits. At this time, only the 19 Performance Measurement Counties will be reviewed.

If you have any questions about the county WPR case validation reviews, please contact Doris Bowers at (916) 928-2252 or Lee Macias at (916) 928-2532.

Sincerely,

Original Document Signed By:

KÄREN CAGLE, Chief
Estimates and Research Services Branch

Attachment

Work Participation Rate Validation Questions and Answers

1. What Federal Fiscal Year (FFY) will the reviews be on?

CDSS will begin its reviews with FFY 2008.

2. How far in advance will counties be contacted to set up a review date?

Counties will be contacted at least 30 days in advance to establish a review date.

3. This is a really bad time for C-IV migration counties. Can these counties be scheduled near the end of the reviews?

Because CWDA and counties are better aware of scheduling issues, CDSS has asked them to prepare the order of county reviews. CDSS believes this only affects three of the 19 Performance Measurement Counties and agrees they may be scheduled last.

4. How much time will counties have to provide their procedures to CDSS?

In the initial contact letter, counties will be asked to provide the procedures at least two weeks before the scheduled appointment. This is so the review team can review the procedures before the review date and is a time saver only. If procedures are not provided, it will not delay the review. Reviewers will need to go over the procedures at the entrance meeting. If a schedule of the 19 reviews is completed now by CWDA, counties will have advanced notice that the procedures will be requested and they can send them earlier.

5. How far in advance will counties receive their sub-sample?

Counties will receive their sub-sample approximately one week prior to the scheduled review. This is consistent with Food Stamp Quality Control procedures.

6. What is the sub-sample size?

The sub-sample will consist of 120 cases.

7. Which numerator/denominator cases are included in the review?

The sub-sample will include cases in the numerator, in the denominator but not in the numerator, and those excluded from the denominator.

8. How will CDSS capture state exemptions and non-federal countable activities?

Cases are reviewed per federal rules. Cases with State exemptions are still included in the federal work participation rate and will be reviewed accordingly. Also, non-federal countable activities are not allowable in computing the federal rate and will not be captured.

9. How long will CDSS be in the counties?

This depends on the counties' procedures. CDSS expects to be in each county at least three to four days.

10. How long before counties will receive the written report?

Because this is a new process, it is difficult to determine how long it will take to complete the report and have it reviewed within CDSS. CDSS will attempt to complete the report within ten working days, but reserves the right to adjust this.

11. How long will have counties have to dispute a finding?

The Pay for Performance regulations state counties will have ten working days to dispute. This is consistent with Food Stamp Quality Control procedures.

12. How will the review outcome data be compiled and used?

The review outcome data will be sent to counties for their review and to use as a management tool. The review outcome data will also be compiled into a database and will be used to validate the accuracy of the reported WPR data. It will also be used by CDSS as a management tool to determine how the state is doing and prepare for any possible penalties. In addition, the reviews comply with the Federal requirements.