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December 1, 2021

Angela Struckmann, Director
Department of Human Services
3600 Westwind Boulevard
Santa Rosa, CA 95403

Dear Ms. Struckmann:

We performed the procedures enumerated below, which were requested and agreed to by you, solely to assist the Human Services Department (HSD) to validate the accuracy of its FNS-209, Status of Claims Against Households (a.k.a. Form FNS-209), that was submitted to the California Department of Social Services (CDSS) for the quarter ended June 30, 2021. HSD's management is responsible for ensuring the accuracy of Form FNS-209 and compliance with all applicable Federal laws, State statutes, and County ordinances. The sufficiency of the procedures is solely the responsibility of HSD's management. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. This report is applicable solely to Form FNS-209 referred to above and is not intended to pertain to any other forms, projects, or programs of HSD.

The procedures we performed and our findings are as follows:

We obtained Form FNS-209 prepared by HSD for the quarter ended June 30, 2021, and compared each line item on the report with the County's system generated report for the same period. We performed the two accountability tests outlined in the All County Letter from CDSS dated July 16, 2019, as described below.

1. Per compliance requirements, we traced lines 3b through 20b of the FNS-209 to the County's system generated report for the quarter ended June 30, 2021. The schedules of reporting differences, Accountability Test 1 (Schedules I, II and III) include all lines that are not calculated based on amounts in other lines. Calculated lines were also verified as part of the audit testing.

Result:

We noted variances on line 3b for Inadvertent Household Errors (IHE) in both the number of claims and the amount, we also noted a variance on line 4 for the Administrative Errors (AE) amount. Additionally for line 11a we noted variances in the amounts collected for both IHE and AE. All other line item variances are a result of the variances noted above. All variances identified were researched and are due to transactions being entered into the Ventura Automated Collection System (VACS) and backdated to the quarter ending June 30, 2021, after the FNS-209 was filed.

The differences noted between the two reports are detailed on Schedule III and discussed on Attachment I.

2. We compared the ending balances as of the June 30, 2021 quarter FNS-209 report, with the County's system generated report. Per compliance requirements, we chose to trace the June 30, 2021 ending balance to a complete history of all the claims that made up the ending balance.

Result:

The ending balances of the June 30, 2021 quarter FNS-209 report, was different from that of the County's system generated report as detailed on Schedule IV and discussed on Attachment I.

We were not engaged to, and did not perform an audit or examination, the objectives of which would be the expression of opinions on HSD's Form FNS-209, or compliance with applicable Federal laws, State statutes, or County ordinances. Accordingly, we do not express such opinions. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Sonoma County Board of Supervisors, Sonoma County Executives, HSD's management, CDSS, Federal agencies, and pass-through entities. It is not intended to be and should not be used by anyone other than these specified parties. However, this restriction is not intended to limit distribution of this report, which is a matter of public record.

Sonoma County Auditor-Controller

Attachments

Attachment I, Comments and Recommendations

Schedule I - Data Submitted to State

Schedule II - System Generated Data

Schedule III - Variance Between Data Submitted to State and System Generated Data

Schedule IV - Ending Balance Comparison and Case Level Summary

Attachment I
Comments and Recommendations
County of Sonoma, Department of Human Services
Quarter Ended June 30, 2021

1. The 3b, 4, 7, 11a, 12, 13, 16 and 18a lines we validated on the FNS-209 for the quarter ending June 30, 2021 do not agree with those on the system generated report. All variances are driven by the variances in lines 3b, 4, and 11a.

We noted that the report produced from the County's system on September 7, 2021 did not agree with the report submitted to the State for the quarter ended June 30, 2021 (see Schedules I, II and III for detail). This was due to the County continuing to record backdated transactions after the report applicable to the period had been submitted.

Recommendation

The County should develop a procedure for identifying the backdated transactions and file corrected FNS-209's as necessary.

2. The ending balances of the June 30, 2021 FNS-209, as well as the ending balance of the prior validation performed for the June 30, 2019 FNS-209, do not agree with the County's system generated reports.

During our review of HSD's FNS-209 report for the quarter ended June 30, 2021, we noted that the ending balances and number of claims for all three categories did not tie to the County's records providing a complete history of all claims in the system. The variances are noted on Schedule IV of this document.

Repeat Recommendation

We were not able to determine the causes for the difference. As discussed in the previous item, a part of the difference may be due to the County's practice of continuing to record backdated prior quarter transactions after the FNS-209 has been submitted. It will likely not be practical nor beneficial to fully reconcile these totals.

We recommend that the County, in consultation with the State, make a one-time adjustment to the total reported to the State to make the two totals agree. Going forward, the totals will agree provided the County accounts for any backdated transactions recorded after the submission of the FNS-209 and files corrected reports.

**Schedule I - Data Reported to State
 Accountability Test I
 County of Sonoma, Department of Human Services
 Quarter Ended June 30, 2021**

Data Reported to State						
U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE STATUS OF CLAIMS AGAINST HOUSEHOLDS			1a. STATE NAME CALIFORNIA		2a. QUARTER COVERED <input type="checkbox"/> 1-First <input checked="" type="checkbox"/> 3-Third <input type="checkbox"/> 2-Second <input type="checkbox"/> 4-Fourth	
			1b. COUNTY SONOMA		2b. FISCAL YEAR 2021	
CLAIMS SUMMARY	A. INTENTIONAL PROGRAM VIOLATION		B. INADVERTENT HOUSEHOLD ERROR		C. STATE AGENCY ADMINISTRATIVE ERROR	
	NUMBER	AMOUNT	NUMBER	AMOUNT	NUMBER	AMOUNT
3a. BEGINNING BALANCE	85	\$188,135.00	3613	\$3,210,021.70	2783	\$886,006.35
b. BALANCE ADJUSTMENTS	0	\$0.00	(36)	(\$10,303.00)	(36)	(\$6,902.00)
4. NEWLY ESTABLISHED	0	\$0.00	150	\$153,071.00	30	\$6,801.00
5. TRANSFER (+) or (-)	0	\$0.00	0	\$0.00	0	\$0.00
6. REFUNDS (20a +20B)		\$0.00		\$0.00		\$0.00
7. TOTAL (3a+3b+4+5+6)	85	\$188,135.00	3727	3,352,789.70	2777	\$885,905.35
8. CLOSED	0		138		177	
9. TERMINATED	0	\$0.00	71	\$247.00	34	\$87.00
10. COMPROMISED	0	\$0.00	0	\$0.00	0	\$0.00
11a. COLLECTION (18a)		\$2,102.00		\$114,989.00		\$33,564.00
b. COLLECTION ADJ. (18b+18c)		\$0.00		(\$250.00)		\$0.00
12. TOTAL	0	\$2,102.00	209	\$114,986.00	211	\$33,651.00
13. ENDING BALANCE	85	\$186,033.00	3518	\$3,237,803.70	2566	\$852,254.35

COLLECTION SUMMARY

14. CASH, CHECK, M.O.	\$276.00	\$60,884.00	\$12,544.00
15. FOOD STAMPS	\$0.00	\$19,486.00	\$4,385.00
16. RECOUPMENT	\$1,826.00	\$34,619.00	\$16,635.00
17. OFFSET	\$0.00	\$0.00	\$0.00
18a. TOTAL (14+15+16+17)	\$2,102.00	\$114,989.00	\$33,564.00
b. CASH ADJ. (+) or (-)	\$0.00	(\$250.00)	\$0.00
c. NON-CASH ADJ. (+) or (-)	\$0.00	\$0.00	\$0.00
19. TRANSFERS (+) or (-)	\$0.00	\$0.00	\$0.00
20a. CASH REFUNDS	\$0.00	\$0.00	\$0.00
b. NON- CASH REFUNDS	\$0.00	\$0.00	\$0.00

**Schedule II - System Generated Data
 Accountability Test I
 County of Sonoma, Department of Human Services
 Quarter Ended June 30, 2021**

System Generated VACs Report and Other Internal Records - Run by Auditor September 7, 2021						
U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE STATUS OF CLAIMS AGAINST HOUSEHOLDS			1a. STATE NAME CALIFORNIA		2a. QUARTER COVERED <input type="checkbox"/> 1-First <input checked="" type="checkbox"/> 3-Third <input type="checkbox"/> 2-Second <input type="checkbox"/> 4-Fourth	
			1b. COUNTY SONOMA		2b. FISCAL YEAR 2021	
CLAIMS SUMMARY	A. INTENTIONAL PROGRAM VIOLATION		B. INADVERTENT HOUSEHOLD ERROR		C. STATE AGENCY ADMINISTRATIVE ERROR	
	NUMBER	AMOUNT	NUMBER	AMOUNT	NUMBER	AMOUNT
3a. BEGINNING BALANCE	85	\$188,135.00	3613	\$3,210,021.70	2783	\$886,006.35
b. BALANCE ADJUSTMENTS	0	\$0.00	(38)	(\$10,842.00)	(36)	(\$6,902.00)
4. NEWLY ESTABLISHED	0	\$0.00	150	\$153,071.00	30	\$6,717.00
5. TRANSFER (+) or (-)	0	\$0.00	0	\$0.00	0	\$0.00
6. REFUNDS (20a +20B)		\$0.00		\$0.00		\$0.00
7. TOTAL (3a+3b+4+5+6)	85	\$188,135.00	3725	\$3,352,250.70	2777	\$885,821.35
8. CLOSED	0		138		177	
9. TERMINATED	0	\$0.00	71	\$247.00	34	\$87.00
10. COMPROMISED	0	\$0.00	0	\$0.00	0	\$0.00
11a. COLLECTION (18a)		\$2,102.00		\$115,234.00		\$34,809.00
b. COLLECTION ADJ. (18b+18c)		\$0.00		(\$250.00)		\$0.00
12. TOTAL	0	\$2,102.00	209	\$115,231.00	211	\$34,896.00
13. ENDING BALANCE	85	\$186,033.00	3516	\$3,237,019.70	2566	\$850,925.35

COLLECTION SUMMARY

14. CASH, CHECK, M.O.	\$276.00	\$60,884.00	\$12,544.00
15. FOOD STAMPS	\$0.00	\$19,486.00	\$4,385.00
16. RECOUPMENT	\$1,826.00	\$34,864.00	\$17,880.00
17. OFFSET	\$0.00	\$0.00	\$0.00
18a. TOTAL (14+15+16+17)	\$2,102.00	\$115,234.00	\$34,809.00
b. CASH ADJ. (+) or (-)	\$0.00	(\$250.00)	\$0.00
c. NON-CASH ADJ. (+) or (-)	\$0.00	\$0.00	\$0.00
19. TRANSFERS (+) or (-)	\$0.00	\$0.00	\$0.00
20a. CASH REFUNDS	\$0.00	\$0.00	\$0.00
b. NON- CASH REFUNDS	\$0.00	\$0.00	\$0.00

**Schedule III - Variance Between Data Reported to State and System Generated Data
 Accountability Test I
 County of Sonoma, Department of Human Services
 Quarter Ended June 30, 2021**

Variance Between Reported amounts and September 7, 2021 System Generated VACs Report						
U.S. DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE STATUS OF CLAIMS AGAINST HOUSEHOLDS			1a. STATE NAME CALIFORNIA		2a. QUARTER COVERED <input type="checkbox"/> 1-First <input checked="" type="checkbox"/> 3-Third <input type="checkbox"/> 2-Second <input type="checkbox"/> 4-Fourth	
			1b. COUNTY SONOMA		2b. FISCAL YEAR 2021	
CLAIMS SUMMARY	A. INTENTIONAL PROGRAM VIOLATION		B. INADVERTENT HOUSEHOLD ERROR		C. STATE AGENCY ADMINISTRATIVE ERROR	
	NUMBER	AMOUNT	NUMBER	AMOUNT	NUMBER	AMOUNT
3a. BEGINNING BALANCE	0	\$0.00	0	\$0.00	0	\$0.00
b. BALANCE ADJUSTMENTS	0	\$0.00	2	\$539.00	0	\$0.00
4. NEWLY ESTABLISHED	0	\$0.00	0	\$0.00	0	\$84.00
5. TRANSFER (+) or (-)	0	\$0.00	0	\$0.00	0	\$0.00
6. REFUNDS (20a +20B)		\$0.00		\$0.00		\$0.00
7. TOTAL (3a+3b+4+5+6)	0	\$0.00	2	\$539.00	0	\$84.00
8. CLOSED	0		0		0	
9. TERMINATED	0	\$0.00	0	\$0.00	0	\$0.00
10. COMPROMISED	0	\$0.00	0	\$0.00	0	\$0.00
11a. COLLECTION (18a)		\$0.00		(\$245.00)		(\$1,245.00)
b. COLLECTION ADJ. (18b+18c)		\$0.00		\$0.00		\$0.00
12. TOTAL	0	\$0.00	0	(\$245.00)	0	(\$1,245.00)
13. ENDING BALANCE	0	\$0.00	2	\$784.00	0	\$1,329.00

COLLECTION SUMMARY			
14. CASH, CHECK, M.O.	\$0.00	\$0.00	\$0.00
15. FOOD STAMPS	\$0.00	\$0.00	\$0.00
16. RECOUPMENT	\$0.00	(\$245.00)	(\$1,245.00)
17. OFFSET	\$0.00	\$0.00	\$0.00
18a. TOTAL (14+15+16+17)	\$0.00	(\$245.00)	(\$1,245.00)
b. CASH ADJ. (+) or (-)	\$0.00	\$0.00	\$0.00
c. NON-CASH ADJ. (+) or (-)	\$0.00	\$0.00	\$0.00
19. TRANSFERS (+) or (-)	\$0.00	\$0.00	\$0.00
20a. CASH REFUNDS	\$0.00	\$0.00	\$0.00
b. NON- CASH REFUNDS	\$0.00	\$0.00	\$0.00

Schedule IV - Ending Balance Comparison and Case Level Summary
Accountability Test II
County of Sonoma, Department of Human Services
Quarter Ended June 30, 2021

Methodology used to run a system-generated case level report:

A query is created out of the VACS database for all transactions with debt type codes of ADM (AE), IHE or IPV separately using an Access Database. Each query included transactions with effective dates and dates of discovery prior to 7-1-2021, which had a type code of FOO and a debt balance greater than \$0.00.

Each set of transactions is loaded into a separate spreadsheet and the auditor created a pivot table showing the **Sum of debt balance** for each outstanding **reference number** by debt type code (IPV, IHE or ADM).

Summary Results:

This test result consists of data from the FNS-209, Status of Claims Against Households ending balances at June 30, 2021, and system-generated history reports out of the VACS collection system run on October 28, 2021 as of June 30, 2021. The table below is the summary of results of each debt type code which lists the outstanding balance as of June 30, 2021.

Claims #	IPV #	IHE #	AE #	Total #
History Report	153	4,032	3,260	7,445
June 2021 FNS-209	85	3,518	2,566	6,169
Difference	68	514	694	1,276
Claims \$	IPV \$	IHE \$	AE \$	Total \$
History Report	\$ 277,922.04	\$ 3,100,294.48	\$ 864,616.33	\$ 4,242,832.85
June 2021 FNS-209	\$ 186,033.00	\$ 3,237,803.70	\$ 852,254.35	\$ 4,276,091.05
Difference	\$ 91,889.04	\$ (137,509.22)	\$ 12,361.98	\$ (33,258.20)

type_code IPV	FOO
Sum of debt_balance	Count of reference_number
277,922.04	153

type_code IHE	FOO
Sum of debt_balance	Count of reference_number
3,100,294.48	4,032

type_code ADM	FOO
Sum of debt_balance	Count of reference_number
864,616.33	3,260