



KIM JOHNSON  
DIRECTOR

CALIFORNIA HEALTH & 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

July 12, 2023

Sanja Bugay, Director  
Department of Social Services  
Fresno County  
P.O. Box 1912  
Fresno, CA 93718-1912

SUBJECT: ADOPTION ASSISTANCE PROGRAM (AAP) MONITORING FINDINGS  
REPORT

Dear Ms. Bugay:

The California Department of Social Services (CDSS), Adoption Services Branch, conducted AAP monitoring of Fresno County, May 8, 2023 to May 12, 2023. This monitoring was performed to determine the county's compliance with federal Title IV-E and state AAP requirements.

The county of Fresno is responsible for the administration of AAP per Social Security Act, Title IV-E, Sections 471, 472, 473 and 475; Welfare and Institutions Code Sections 16115 through 16125; and Title 22 CCR Sections 35325 through 35352.1. The AAP case file monitoring included an assessment of all available supporting documentation to verify Title IV-E AAP eligibility determinations were made in accordance with federal requirements. The following AAP documents were also reviewed: Federal Eligibility Certification for AAP (FC 8), Eligibility Certification AAP (AAP 4), AAP Negotiated Benefit Amount and Approval (AAP 6), AAP Agreement (AD 4320), Payment Instructions AAP (AAP 2), AAP Non-Recurring Adoption Expenses Agreement (AAP 8), Notices of Action, and related AAP documentation.

A total of 20 AAP case files were monitored and 8 case files were found to be out of compliance with federal policy and/or California's AAP statutes and regulations. Please refer to the tables at the end of this report that list the items found out-of-compliance for each file that was monitored.

The CDSS is requesting that the county prepare a Corrective Action Plan (CAP) that addresses the following two areas:

- **Short-term:** Describe how the county will satisfactorily resolve each finding. For example, what action will the county take and what evidence will be provided to ensure the county corrected the finding(s) so that the file in question is no longer out of compliance?

- Long-term: Describe and implement new policies and procedures and/or revisions to current policies and procedures that ensure the administration of AAP is in accordance with federal and state laws and regulations. For example, if an incorrect form was used, how will the county ensure the correct form will be used in the future?

The county will have 30 days from the date of this letter to submit the CAP to the AAP Monitoring unit. Please ensure the CAP addresses both the short-term and the long-term areas described above. The CAP should be forwarded to the monitor assigned to your county, Heather Moore, at [HeatherL.Moore@dss.ca.gov](mailto:HeatherL.Moore@dss.ca.gov).

#### Previous Monitoring

The county submitted a CAP dated March 7, 2022, to correct findings from the last monitoring review conducted in January of 2022. A review of 5 previously monitored cases was performed to determine whether corrections to prior findings had been properly addressed. It was determined that all findings in the CAP have been properly addressed and a CAP completion letter will be forthcoming.

The monitoring staff wishes to express their appreciation for the cooperation received from your county liaison during the process. If you or your staff have any questions or comments about this letter, or if you would like assistance in any area, including the development of your CAP, please contact Heather Moore, AAP Monitor, at [HeatherL.Moore@dss.ca.gov](mailto:HeatherL.Moore@dss.ca.gov).

#### ***Original Document Signed By***

STEVE SHIELDS  
Manager  
Adoptions Services Branch

c: Christina Escobedo, Program Supervisor

Case #	Non-Compliant Condition
[REDACTED]	<ul style="list-style-type: none"><li>• <b>AAP case file and AAP eligibility file:</b> The required AAP 4 dated 12/21/20 was completed incorrectly. Specifically, in Section III, on the "Applicable Child Pathway," the "child's age" and "Federal Fiscal Year" were not correct.  <b>Recommended Correction:</b> Ensure a correct and complete AAP 4 is included in both the AAP case file and AAP eligibility file.</li><li>• The required FC 8 dated 9/1/20 was completed incorrectly. Specifically, on the "Applicable Child Pathway," the "child's age" and "Federal Fiscal Year" were not correct.  <b>Recommended Correction:</b> Ensure a correct and complete FC 8 is included in both the AAP case file and AAP eligibility file.</li></ul>
[REDACTED]	<ul style="list-style-type: none"><li>• <b>AAP case file:</b> The required AD 4320 (amended agreement) was not present in the file for the rate change back to the AAP basic rate.  <b>Recommended Correction:</b> Ensure a correct and complete AD 4320 is included in the AAP case file.</li><li>• The required AAP 6 (Subsequent Renegotiation) was not present in the file for the rate change back to the AAP basic rate.  <b>Recommended Correction:</b> Ensure a correct and complete AAP 6 is included in the AAP case file.</li><li>• <b>AAP case file and AAP eligibility file:</b> The required AAP 4 dated 3/26/21 was completed incorrectly. Specifically, in Section 1, statement # 2, the "Professional certifying disability" had no credential.  <b>Recommended Correction:</b> Ensure a correct and complete AAP 4 is included in both the AAP case file and AAP eligibility file.</li><li>• The required AAP 2 (Change in need or circumstances) was not present in the file for the rate change back to the AAP basic rate.</li></ul>

	<p><b>Recommended Correction:</b> Ensure a correct and complete AAP 2 is included in both the AAP case file and AAP eligibility file.</p> <ul style="list-style-type: none"><li>• The required "Notice of Action (NOA)" dated 10/19/22 was completed incorrectly. Specifically, the "Monthly negotiated rate" was check marked as increased when the rate was decreased to the AAP basic rate.</li></ul> <p><b>Recommended Correction:</b> Ensure a correct and complete NOA is included in both the AAP case file and AAP eligibility file.</p>
██████████	<ul style="list-style-type: none"><li>• <b>AAP case file and AAP eligibility file:</b> The required AAP 4 dated 10/28/22 was completed incorrectly. Specifically, in Section I, statement #2, "The child's mental, physical, emotional, medical, or developmental disability...." was check marked when no information was completed.</li></ul> <p><b>Recommended Correction:</b> Ensure a correct and complete AAP 4 is included in both the AAP case file and AAP eligibility file.</p>
██████████	<ul style="list-style-type: none"><li>• <b>AAP case file and AAP eligibility file:</b> The required AAP 2 dated 1/17/23 was completed incorrectly. Specifically, on page 2, the adoptive mother's first name was spelled incorrectly.</li></ul> <p><b>Recommended Correction:</b> Ensure a correct and complete AAP 2 is included in both the AAP case file and AAP eligibility file.</p>
██████████	<ul style="list-style-type: none"><li>• <b>AAP case file:</b> The required AAP 6 dated 1/17/23 was incomplete. Specifically, in "Part A," in the "AAP Basic Rate" section, neither box was check marked.</li></ul> <p><b>Recommended Correction:</b> Ensure a correct and complete AAP 6 is included in the AAP case file.</p>
██████████	<ul style="list-style-type: none"><li>• <b>AAP case file:</b> The required AAP 6 dated 12/20/22 was incomplete. Specifically, in "Part A," in the "AAP Basic Rate" section, neither box was check marked.</li></ul> <p><b>Recommended Correction:</b> Ensure a correct and complete AAP 6 is included in the AAP case file.</p>

	<ul style="list-style-type: none"><li>• <b>AAP case file and AAP eligibility file:</b> The required AAP 2 dated 12/20/22 was completed incorrectly. Specifically, on page 2, the adoptive parent's last name was spelled incorrectly.  <b>Recommended Correction:</b> Ensure a correct and complete AAP 2 is included in both the AAP case file and AAP eligibility file.</li></ul>
██████████	<ul style="list-style-type: none"><li>• The required AAP 4 dated 1/5/23 was completed incorrectly. Specifically, in Section I, statement #2, the "Professional certifying disability" did not include a qualifying professional credential.  <b>Recommended Correction:</b> Ensure a correct and complete AAP 4 is included in both the AAP case file and AAP eligibility file.</li></ul>
██████████	<ul style="list-style-type: none"><li>• <b>AAP case file:</b> The required AD 4320 was incomplete. Specifically, in Section I, statement #1, the "AAP benefit" amount was not correct.  <b>Recommended Correction:</b> Ensure a correct and complete AD 4320 is included in the AAP case file.</li></ul>

**Technical Assistance:**

- Case number ██████████ was not included in this review because it appears that the child aged out before the review took place. We do have some technical assistance regarding this case to consider for future cases:
  - A. For children who will age out of AAP before the "First Reassessment Date" on the AD 4320, the reassessment date would be their 18<sup>th</sup> birthday
  - B. For children who will age out of AAP, the "Date of Reassessment" on the AAP 2, would be their 18<sup>th</sup> birthday.
  - C. Children who begin AAP at age 16 years and older are under the 07 aid code for payment purposes.