



COUNTY OF SAN DIEGO  
2021 APR -2 AM 8:23  
CLERK OF THE BOARD  
OF SUPERVISORS

# COUNTY OF SAN DIEGO

## BOARD OF SUPERVISORS

1600 PACIFIC HIGHWAY, ROOM 335, SAN DIEGO, CALIFORNIA 92101-2470

### AGENDA ITEM

**DATE:** April 6

**22**

**TO:** Board of Supervisors

#### **SUBJECT**

**TERMINATION OF EARLY FRAUD PREVENTION/DETECTION- SAN DIEGO COUNTY PROJECT 100% (DISTRICTS: ALL)**

#### **OVERVIEW**

In April 1997, the Board of Supervisors approved an initiative with the District Attorney's Office and the Health and Human Services Agency to implement Project 100% (P100). The initiative established a process within Early Fraud Prevention/Detection for Public Assistance ~~Investigators~~ **Investigations** (PAIs) to interview all Cal WORKs applicants to verify eligibility information supplied by the applicant before benefits are granted.

P100 ~~PAI~~ ~~investigative officers~~ previously worked out of the District Attorney's office. Currently, they are assigned to the Bureau of Public Assistance Investigations (BPAI) Public Assistance Fraud (PAF) division of the Department of Child Support Services (DCSS).

P100 "home visits" are generally scheduled with CalWORKs applicants and often can create significant stress and anxiety for applicants. Applicants feel the stigma of "home visits" adds another barrier to accessing services. Removing this piece of the verification process would allow folks to engage with the county more holistically when they most need support.

~~P100 "home visits" are generally unannounced and can create significant stress and anxiety for applicants. Perhaps more important, the program intrudes on the privacy of CalWORKs applicants by requiring them to allow investigators into their homes in order to complete the income eligibility verification process.~~

**San Diego County stands alone in requiring families who are experiencing poverty to open their homes to Investigators law enforcement when there is no evidence or reason to suspect fraud or any kind of wrongdoing.**

San Diego County regularly fails to enroll a high percentage of eligible residents in major federal safety net programs, including CalFresh, Medi-Cal, and CalWORKs, at an estimated cost of \$1 billion lost annually to the local economy.

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Policies like P100 are likely to dissuade people from applying for benefits. San Diego County should be doing everything it can to remove barriers to families in need of assistance to survive these difficult economic times. Elimination of P100 will be one vital step in this process.

P100 is not effective in discovering fraud. After the 2013 publication of a report by the Open Society Foundation on P100, which demonstrated that the County had been systematically inflating the efficacy of the program for more than a decade, the County began to recode the data. Contemporary statistics indicate that the vast majority of P100 “home visits” result in no denial or reduction of benefits. This experience is consistent with that of Los Angeles County, which had a similar program from 1999 to 2008 called the Home Interview Program (HIP). LA County voluntarily terminated their program after concluding it was ineffective in discovering or deterring fraud. Ending the HIP program was a cost neutral action which resulted in staff positions being redeployed to alleviate workloads in other areas.

The average annual cost of P100 is approximately \$1.6 Million. A termination of P100 program will create an opportunity to fill critical vacancies within the HHSA. Termination will also create new opportunities to enhancing County investigations of wage theft, elder abuse (physical or financial), consumer scams, insurance/workers comp fraud, and other kinds of fraud.

Furthermore, by ending P100 the County shall redirect resources to get people out of poverty in a meaningful and less invasive way. Those redirected resources will provide access to jobs, build strong social safety nets, and increase people’s ability to thrive without needing to rely on state assistance.

Today’s actions request the Board to commit to ending Project 100%. The recommendations below will lay out a framework to meet this goal.

**RECOMMENDATION(S)**

**SUPERVISOR TERRA LAWSON-REMER AND VICE-CHAIR NORA VARGAS**

1. Direct the Chief Administrative Officer (CAO) to take all necessary actions to immediately terminate Project 100%. This includes, but is not limited to, terminating mandatory applicant home visits and interviews as a pre-requisite in determining eligibility.
2. Direct the Chief Administrative Officer to report back to the Board by Tuesday June 8, 2021, with an update on the termination of Project 100% and the placement of the affected County staff.
3. In accordance with the County Charter and Civil Service Rules, direct the CAO to assist interested impacted employees in finding other job opportunities within the County.

**FISCAL IMPACT**

If approved, this request will have no impact on Fiscal Year 2020-21.

**BUSINESS IMPACT STATEMENT**

*N/A*

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              DIEGO COUNTY PROJECT 100% (DISTRICTS: ALL)**

**ADVISORY BOARD STATEMENT**

*N/A*

**BACKGROUND**

In April 1997, The Board of Supervisors approved an initiative with the District Attorney’s Office and the Health and Human Services Agency to implement Project 100%. The initiative established a process within Early Fraud Prevention/Detection for Public Assistance Investigators Investigations (PAIs) to interview all Cal WORKs applicants to verify eligibility information supplied by the applicant before benefits are granted.

Applicants are advised that a PAI will contact them within 10 days of their application for Cal WORKs.

- A Project 100% referral is mandatory when:
- The applicant has not received Cal WORKs in San Diego County in the last 12 months
- There are no other discrepancies or a suspicion of fraud (not an allegation referral)
- The application is not an obvious denial
- As a continuation of the application process, the PAI conducts an interview (home visit to verify eligibility factors (children, residency, AP)
- The PAI may conduct a walk-through, to gather information when necessary to resolve an outstanding issue or discrepancy discovered during the interview
- Limited collateral contacts allowed

The County of San Diego already checks cases in various databases as well as conducts an in-person interview as part of the process. Such databases include:

- Income and Eligibility Verification System
- Payment Verification System
- New Hire Registry
- Integrated Earnings Clearance Fraud Detection
- Beneficiary Earnings Exchange Records
- Franchise Tax Board Asset Match
- Fleeing felon Match
- Nationwide Prisoner Match
- Deceased Person Match

Recipients brought a State-law action challenging the Project 100% program which have resulted in \$894.14 in litigation expenses and \$71,331.15 in salaried attorney time. The County has required all families applying for CalWORKs benefits to submit to possible unannounced home visit interviews to verify eligibility information supplied by the applicant before benefits are granted investigations and interrogations by law enforcement investigators. This policy imposes hardships on people of color and women, who are disproportionately represented among CalWORKs applicants, is cost-ineffective and fails to achieve its intended goals of verifying eligibility, detecting fraud, or deterring fraud.

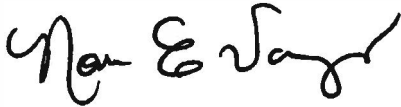
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Families feel criminalized for requesting aid and have their privacy invaded through the P100 ~~home visit~~~~announced investigations~~. The home ~~visit~~~~investigations~~ may cause unnecessary delay in the delivery of aid and services to hungry and homeless families. As a County we must move away from models that measure success on how many people it keeps in poverty and shift to a County that directs resources to get people out of poverty and back to the workforce.

**LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN**

Today's proposed request supports the Living Safely Initiative of the County of San Diego's 2021-2026 Strategic Plan. With the County's commitment to excellence, this action will make a positive difference in the lives of the residents we serve.

Respectfully submitted,



NORA VARGAS  
Vice Chair, First District



TERRA LAWSON-REMER  
Supervisor, Third District

**ATTACHMENT(S)**

N/A

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**AGENDA ITEM INFORMATION SHEET**

**REQUIRES FOUR VOTES:**       Yes     No

**WRITTEN DISCLOSURE PER COUNTY CHARTER SECTION 1000.1 REQUIRED**  
 Yes     No

**PREVIOUS RELEVANT BOARD ACTIONS:**  
N/A

**BOARD POLICIES APPLICABLE:**  
N/A

**BOARD POLICY STATEMENTS:**  
N/A

**MANDATORY COMPLIANCE:**  
N/A

**ORACLE AWARD NUMBER(S) AND CONTRACT AND/OR REQUISITION NUMBER(S):**  
Click here to enter text.

**ORIGINATING DEPARTMENT:** First and Third Supervisorial Districts

**OTHER CONCURRENCE(S):**    N/A

**CONTACT PERSON(S):**

Gloria Cruz Cardenas

Andrew J. Feaster

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Name  
(858) 289-9203

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Name  
(858) 289-9244

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Phone  
Gloria.CruzCardenas@sdcouty.ca.gov

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Phone  
Andrew.Feaster@sdcounty.ca.gov

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E-mail

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E-mail