

Transforming CalWORKs
Implementation Support:

Non-Compliance and Sanctions

June 9, 2026



Welcome

CFPIC

- Stuart Oppenheim, Director Emeritus CFPIC

CDSS Engagement Bureau

- Andrew Wilson, Analyst II
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Housekeeping

- Please mute your mics
- Name format: first, last, and county.
- Monitoring and responding to chat
- Complex questions held for the Q&A

Agenda

- CDSS: SB 119 Sanction Reforms
- Scenarios
- Automation
- Discussion and Q&A



Level setting: while other presentations in this series have had county participation in the form of presentations on best practices or similar, the changes to sanctions and noncompliance are such a significant departure from prior policy that we felt it more important to ensure unity of understanding on this subject.

Changes to Non-Compliance and Sanction Processes

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*CalWORKs Parent Engagement
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Learning Objectives

Participants should be able to:



List effective dates for SB 119 sanction reforms



Explain the changes to WTW sanction policy



Identify strategies for implementing these changes

Senate Bill (SB) 119 (Chapter 79, Statutes of 2025)

- The spirit of SB 119
 - Self-Determination
 - Flexible Program Requirements
 - Reduced Risk of Sanction
- ACL 26-28

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The intent of SB 119:

- On July 29, 2025, Senate Bill (SB) 119 was signed into law and includes a package of CalWORKs policy reforms that build on the foundation for program improvement first established through the CalWORKs Outcomes and Accountability Review (Cal-OAR) and county-led CalWORKs 2.0 efforts.
- These reforms further reorient CalWORKs from a compliance-based program to one that supports family stability and well-being.
- They center families' voice and choice and are designed to improve families' access to services, emphasizing self-determination in choosing WTW activities, increased flexibility to meet program requirements, and reduced risk of sanctions.

In April of 2026, CDSS released ACL 26-28, which describes the policies we will be discussing today. Please refer to ACL 26-28 for more detailed guidance on SB 119 sanction reforms. Note, if SB 119 did not explicitly change a rule, then current rules, guidelines, and county practices remain the same. This includes the grant calculations and sanction amounts, or the noticing requirements within the non-compliance process.

Senate Bill (SB) 119 (Chapter 79, Statutes of 2025)

Effective Dates

- July 1, 2025:
 - Reschedule Good Cause Meetings
- July 1, 2026:
 - Child Care Check
 - Cure After Break in Aid
- When Automation is Complete:
 - No Sanction in First 90 Days
 - Simplified WTW Sanction Curing



The effective dates for the non-compliance and sanction changes in SB 119 are staggered, with differences in effective dates based on statutory language that varies from section to section.

- The ability to reschedule a good cause appointment more than once had no effective date and therefore went into effect when the budget trailer bill was signed – July 1, 2025.
- The child care check and cure for sanctioned individuals after a break in aid go into effect July 1, 2026.
- The no sanctions for the first 90 days and simplified sanction curing changes, are only effective once necessary automation is ready.

SB 119 Sanction Reforms

1. No Sanctions in first 90 Days
2. Child Care Check
3. Appointment Flexibility

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No Sanctions in the First 90 Days:

In the interest of allowing an easier introduction to WTW, and less pressure at a stressful time in their lives, participants can no longer be sanctioned in the first 90 calendar days from the date an individual is approved for CalWORKs cash aid.

- As reflected in the previous slide, this change is effective July 1, 2026, or when necessary automation changes are complete, whichever comes later.

Child Care Check:

SB 119 added Section 11327.41 to the W&IC, which requires the county HHSA to ensure that, prior to imposing WTW sanctions, the county:

- Provided the participant a request form and the reimbursement rules for [child care] supportive services and
- That, if eligible for [child care] supportive services, the participant had **secured** [child care].
- The section also requires the county HHSA to verify, prior to sanction, that the participant had child care available at the time of required participation in a WTW activity.
- This policy takes effect July 1, 2026.

Appointment Flexibility:

Additionally, SB 119 created flexibility for counties to allow participants to re-schedule good cause appointments more than once.

- Prior law only allowed them to reschedule once in a 20-day period.
- The law now states participants may reschedule that appointment "at least once," during that timeframe.
- While this could cause additional administrative burden if the participant needs to reschedule a large number of times, the 20-day time period still provides an upper limit to this.
- This policy was in effect as of July 1, 2025.

Simplified Sanction Curing

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1. Curing Plans Obsolete
 - a. Desire to cure
 - b. Intent to participate
 - c. No Cure Plan
2. Cure After Break in Aid
3. County Discovery of Participation

These are the three ways that sanction curing and resolution has been simplified under SB 119.

Curing Plans Obsolete:

1. First is the elimination of curing plans. Once necessary automation is in place and this policy takes effect, a simple verbal declaration of the desire to cure a sanction **and** the intent to participate is all that is necessary.
 - The request to cure can include a phone call with the case worker, email, or automation through apps like BenefitsCal, if implemented.
 - This policy takes effect once necessary automation is in place, at which time the WTW 29, sanction curing plan will also become obsolete.
 - Note, per ACL 26-28, while a signed WTW plan is not required to cure a sanction, the county must formalize the agreed upon WTW activity or activities and document any necessary supportive services in a written WTW plan as soon as administratively possible.

Cure after break in aid:

2. As of July 1, 2026, sanctions can no longer follow an individual or case after a break

in aid. Anyone who left aid while in sanction, who later re-applies and is approved for CalWORKs will have their sanction cured.

- The very act of reapplying for CalWORKs cash aid serves to communicate a desire to cure their sanction and an intent to participate.
- Their aid must be restored in the application month in alignment with existing practice for granting aid to eligible adults.

County Discovery of Participation:

3. Per existing WTW policy described in ACL 19-68, county HHSAs are prohibited from imposing WTW noncompliance procedures and sanctions when the county discovers a participant is meeting WPR.

- SB 119 will require that a WTW participant’s sanction end when a county HHSAs verifies or otherwise discovers, “based on the most recent documentation available,” that a sanctioned individual “is or has been” meeting the minimum hourly federal work participation requirements.
 - CDSS plans to release follow-up sanction cure guidance detailing how counties can use available data sources for this purpose.
- Note: In alignment with existing WTW sanction curing processes, the sanction would end the first of the following month.
- Additionally, SB 119 did not include a provision for individuals discovered to be meeting WPR to opt to remain in sanction status.
 - That option will no longer apply once this provision of SB 119 takes effect.

PRACTICAL SCENARIOS



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It's now time for some interactive engagement! CFPIC helped us make the following scenarios interactive. Vote in the poll for each of the three scenarios, and feel free to provide your reasoning in the chat.

Scenario 1: Tupou

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- Tupou is sanctioned, contacts their WTW case worker, and indicates the desire to end their sanction.
- However, when the worker tries to engage them in a discussion about what activity or activities they would like to do, they indicate no intent to participate.
- Does the county have to cure Tupou's sanction?

Options are Y/N/Maybe.

No. In order to have their sanction cured, an individual must indicate both the desire to end their sanction and the intent to participate.

Scenario 2: Sifa

- Sifa is sanctioned, contacts his WTW case worker, and indicates the desire to end his sanction and intent to participate.
- However, Sifa does not commit to a specific activity at the time he requests to cure his sanction.
- Does the county have to cure Sifa's sanction?

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Y/N/Maybe

Answer:

Yes, the sanction must be cured. According to SB 119 and ACL 26-28, if the individual has contacted the county and indicated both the desire to cure and intent to participate either verbally or in writing, then the individual does not have to commit to or fulfill a specific activity in order to have the sanction cured.

That said, it's possible for a county to attempt to get sanctioned individuals to commit to an activity when they request to cure their sanction, for example, by signing or re-affirming their WTW plan. However, signing a plan or committing to a specific activity cannot be required prior to curing.

Scenario 3: Elenoa

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- Elenoa contacts their WTW case worker and indicates the desire to end her sanction and intent to participate.
- Elenoa follows through, signs a plan, and provides proof of participation.
- If Elenoa **hadn't** followed through and met with the county to complete a WTW plan, could the county initiate noncompliance?

Y/N/Maybe

Answer: Maybe. Elenoa is required to complete a WTW plan unless she's discovered to be meeting WPR. If Elenoa's proof of participation is sufficient to meet WPR requirements, she technically does not have to sign a WTW plan. The county could not initiate noncompliance or impose a sanction as long as she is meeting WPR.

If Elenoa did not provide proof of participation and/or their verifications fail to satisfy their hourly requirements, the county could opt to initiate noncompliance. However, we understand the county would first try to work with Elenoa to help her meet her hourly requirements and be in good standing with the program since she is demonstrating she wants her sanction cured and to participate.

Automation

1. Re-applying, being approved, and curing
2. Noncompliance and the first 90 days
3. Forms

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Re-applying, being approved, and curing:

Some county partners have asked why the curing of sanctioned individuals who left aid and later re-apply and are approved for CW takes effect July 1, 2026.

- In consultation with CalSAWS, CDSS understands that no automation changes are required for counties to be able to cure sanctions for individuals who have just been re-approved for aid.
- However, CDSS acknowledges there are county business practices which may require revision for this change to take effect.
- In just a few moments, we will create space for counties to brainstorm how they can implement this policy change effective July 1, 2026
- Note, automation is scheduled to be completed in September 2026 which should support a wide range of county business practices in implementing this policy.

Noncompliance and the first 90 days:

CDSS has also received a number of questions around initiating noncompliance in the first 90 days. In particular, county partners have expressed concern that, depending on when noncompliance is initiated, it could result in participants' sanction effective dates being within the first 90 days, in conflict with SB 119 and ACL 26-28.

- Noncompliance processes have been largely unaffected by SB 119 and the 20 day

- good cause determination and 10 day noticing periods still exist.
- Counties could adopt business practices to ensure no sanctions are imposed until day 91 by not initiating noncompliance prior to the 61st day.
- However, CDSS is working with CalSAWS to ensure an automation solution is incorporated that protects counties from accidentally initiating a sanction prior to the 91st day.
- At this point, it's not clear whether additional guidance will be required to implement an appropriate automation solution or what the timeline might be for doing so.
- CDSS will provide updates to our county partners as they become available and will continue to engage both CalSAWS and counties to identify and implement an appropriate solution.

Forms:

CDSS is engaged in a detailed review of forms related to non-compliance and sanction, such as the WTW 32 compliance plan and the NA 840 notices series, and will be issuing updates to those forms as soon as possible.

Now What?

- How will your work change once the no sanctions for the first 90 days policy takes effect? Please share any effective and/or innovative participant engagement approaches your county uses or plans to use.
- How will or does your county ensure child care is secured prior to requiring participation?
- Prior to automation enhancements, how can you revise county processes to implement sanction curing for individuals who leave aid in sanction status, then re-apply, and are approved?

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CFPIC SLIDO questions.

Q & A



For
Questions
Please
Contact

- Your WTW county contact
- The CalWORKs Engagement Bureau at CWEngagementPolicy@dss.ca.gov
- The CDSS Transforming CalWORKs team at TransformingCalWORKs@dss.ca.gov

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As with all new bills and corresponding policy guidance, the policies provide a framework but aren't expected to address all questions or unique scenarios which may arise.

Please contact the CW Engagement Bureau with any follow-up questions you may have, and we will be happy to reply via county question, policy interpretation, and/or follow-up guidance (for example, an SB 119 Q&A), as necessary.