

July 2, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

**EXECUTIVE SUMMARY**

**ALL COUNTY LETTER NO. 20-76**

The purpose of this All-County Letter is to add to and extend flexibilities to In-Home Supportive Services Quality Assurance and Program Integrity activities that require face-to-face home visits, as well as provide guidance on workload priorities, during the COVID-19 response.



**KIM JOHNSON**  
DIRECTOR

**GAVIN NEWSOM**  
GOVERNOR

July 2, 2020

ALL COUNTY LETTER NO. 20-76

TO: ALL COUNTY WELFARE DIRECTORS  
ALL IHSS PROGRAM MANAGERS

SUBJECT: EXTENSION OF FLEXIBILITY IN CONDUCTING IN-HOME  
SUPPORTIVE SERVICES QUALITY ASSURANCE AND  
PROGRAM INTEGRITY ACTIVITIES AND WORKLOAD  
PRIORITY GUIDANCE DURING THE COVID-19 RESPONSE

REFERENCE: [COMMUNITY FIRST CHOICE OPTION \(CFCO\) STATE PLAN  
AMENDMENT \(SPA\) 13-007; MANUAL OF POLICIES AND  
PROCEDURES \(MPP\) SECTIONS 30-702.12; ALL-COUNTY  
LETTER 20-42 \(APRIL 16, 2020\)](#)

The purpose of this All-County Letter (ACL) is to add to and extend, flexibilities with regard to counties conducting In-Home Supportive Services (IHSS) Quality Assurance (QA) and Program Integrity (PI) activities, as well as to provide guidance on workload priorities due to the continued effects of the COVID-19 pandemic.

### **EXTENSION AND EXPANSION OF QA AND PI FLEXIBILITIES**

The [ACL 20-42](#) granted counties the ability to use a video conferencing option (such as Skype or FaceTime) in lieu of face-to-face visits for QA and PI home visits through June 30, 2020, to ensure that any unnecessary in-person contact is eliminated during the COVID-19 response. This ACL extends this option to December 31, 2020, and also allows the use of a telephonic option in addition to video conferencing in lieu of face-to-face QA and PI home visits through December 31, 2020. Counties must continue to take appropriate measures to comply with applicable confidentiality and privacy laws when contacting recipients and/or conducting assessments via video conference.

### **COUNTY REQUESTS FOR ALTERNATIVE QA CASE REVIEW MINIMUMS**

The CDSS provides counties with their QA case review minimum requirements (desk reviews and home visits) for the upcoming fiscal year (FY) each April. Per the [MPP](#)

[Section 30-702.123](#), requests for alternative minimums must be submitted in writing to CDSS for review and approval. The request must outline the county's justification as well as a requested alternative case review minimum. These requests are considered on a case-by-case basis. Requests received after the provided deadline are not considered.

For FY 2020-21, CDSS extended the deadline for counties to request alternative case review minimum requirements from May 30, 2020 to June 15, 2020. However, due to the continued effects of COVID-19, CDSS is eliminating the deadline for FY 2020-21. Counties may now request reductions at any time during FY 2020-21 for state review and approval. Requests may be approved for up to a 12-month period. Counties do not have to revise their QA/QI plans if the plans were approved prior to an approved reduction.

### **COUNTY PRIORITIZATION OF IHSS CFCO CASE REASSESSMENTS**

As Community First Choice Option (CFCO) IHSS recipients are some of the most vulnerable, counties are to immediately begin prioritizing the annual reassessments of CFCO IHSS recipients to ensure services are authorized accurately and timely. Additionally, CFCO recipients must be assessed every 12 months in order to determine that they continue to meet the required skilled nursing level of care necessary to receive the enhanced federal financial participation. As specified in the [CFCO SPA 13-007](#), as well as other program rules and requirements, county social workers conduct needs assessments every 12 months, when the individual's support needs or circumstances change, or at the request of the individual or the individual's representative.

Questions or requests for clarification regarding the information in this letter should be directed to the Adult Programs Division, Fiscal, Appeals and Benefit Programs Branch, Benefit Programs and Program Integrity Bureau, Program Integrity Unit at [ihss-pi@dss.ca.gov](mailto:ihss-pi@dss.ca.gov).

Sincerely,

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

DEBBI THOMSON  
Deputy Director  
Adult Programs Division