



WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES



EDMUND G. BROWN JR.
GOVERNOR

December 9, 2014

ALL-COUNTY LETTER (ACL) NO. 14-86

REASON FOR THIS TRANSMITTAL

- State Law Change
- Federal Law or Regulation Change
- Court Order
- Clarification Requested by One or More Counties
- Initiated by CDSS

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY IHSS PROGRAM MANAGERS

SUBJECT: CLARIFICATION ON THE REQUIREMENTS OF THE IN-HOME SUPPORTIVE SERVICES (IHSS) PROGRAM HEALTH CARE CERTIFICATION FORM (SOC 873) BEING PROVIDED DURING AN INTER-COUNTY TRANSFER

REFERENCE: [ACL NO. 12-36 DATED JULY 24, 2012](#), [ACIN I-74-11 DATED DECEMBER 6, 2011](#)

The purpose of this ACL is to provide clarification to counties on the eligibility documentation that must be maintained in recipients' case files and transferred appropriately during the Inter-County Transfer (ICT) process. This ACL will address the responsibility of the transferring and receiving counties and the importance of annotating Case Management, Information and Payrolling System II (CMIPS II) when the required documentation including the IHSS Program Health Care Certification form (SOC 873), is not available in hardcopy in the recipients' case file to be transferred.

BACKGROUND

Since the implementation of CMIPS II and the availability of case documentation within the system, counties have requested clarification regarding the required IHSS documents that must be transferred in hardcopy during an ICT. Counties have specifically requested clarification regarding receipt of an ICT absent the hardcopy of the SOC 873.

Counties have also expressed concern that California Department of Social Services' (CDSS) IHSS State Quality Assurance Monitoring Unit (QAMU) staff reviews their case files to determine if ICT processes are followed appropriately and therefore want to ensure they are in compliance by maintaining all necessary hardcopy documentation in the recipients' case file and annotating CMIPS II Case Notes screen when the required documentation is not available in hardcopy.

DOCUMENTS THAT MUST BE TRANSFERRED IN HARDCOPY DURING AN ICT

CDSS Manual of Policy and Procedures (MPP) section 30-759.911 lists the required documents that must be provided by the transferring county during an ICT. These documents include all IHSS forms which help to establish eligibility, including but not limited to the IHSS Application for Social Services (SOC 295); the most recent IHSS face-to-face assessment; including assessment narrative and any recent notes, an IHSS provider eligibility update; an IHSS Program Provider Enrollment form (SOC 426), if applicable; a Request for Order and Consent Paramedical Services form (SOC 321), if applicable; the current Notice of Action; and any information pertaining to overpayments and fraud investigations, if applicable. Some examples of overpayments and fraud information that must be transferred include but are not limited to the IHSS Complaint of Suspect Fraud Abuse Form (SOC 2248), IHSS Unannounced Home Visit Report from (SOC 2247), Overpayment Demand Letter, Repayment Agreement, and all documentation pertaining to an established lien, withholding, garnishment or tax intercept.

The SOC 873 is not currently listed in MPP section 30-759.911 as one of the documents required to be sent in an ICT since these regulations were written prior to the development of the SOC 873 in 2011, pursuant to Welfare and Institutions Code, section 12309.1. Notwithstanding, since the SOC 873 is a mandatory form that establishes IHSS eligibility, transferring counties must include a hardcopy of the SOC 873 with all documentation being transferred in an ICT. CDSS will update the ICT regulations in the future to include the SOC 873 as a required document that must be provided by the transferring county during an ICT.

For counties who use electronic record storage systems and scan case documents, the scanned version of the forms/documents stated above is sufficient to be sent to the receiving county.

COUNTY RESPONSIBILITY IF THE SOC 873 IS NOT PROVIDED IN HARDCOPY

Although CMIPS II has an indicator that identifies when a SOC 873 is received; it is not a document that is directly maintained in CMIPS II. In an ICT, the transferring county is required to provide the receiving county with hardcopies of all completed forms/documents that are maintained outside of CMIPS II, as listed above in the previous section “Documents that must be transferred in hardcopy during an ICT”.

In the event that the transferring county, for unusual or unforeseen circumstances, does not have the hardcopy of the SOC 873 to send with all other required documents, the transferring county should annotate recipients case file and the CMIPS II Case Notes screen that the SOC 873 is not available and that the Health Care Certification requirement has been met and proceed with ICT process.

As stated in ACIN No. I-74-11, neither the transferring county nor the receiving county is required to request a new SOC 873 from the recipient if the SOC 873 has already been provided by the recipient in the transferring county. However, if the SOC 873 or alternate documentation has not already been provided by the recipient in the transferring county, the receiving county shall request one at or before the face-to-face assessment with the recipient, which the receiving county is required to complete during the transfer period pursuant to MPP section 30-759.94.

In order to successfully complete the ICT process it is critical that counties communicate, provide all required hardcopy documentation, provide clear notes in the recipient’s case file and in CMIPS II and work together to ensure there is no interruption or overlapping of services as a result of a recipient moving from one county to another. Thorough documentation of a good faith effort to obtain the hardcopy of the SOC 873 (or other documents that establish eligibility for the IHSS program) by the receiving county in the recipient’s case file and in CMIPS II, will ensure that there will be no negative findings by QAMU staff with regard to the SOC 873 not being available in hardcopy in the recipient’s case file.

Should you have any questions regarding this ACL, the ICT process or the SOC 873, please contact the Adult Programs Policy and Operations Bureau at (916) 651-5350.

Sincerely,

Original Document Signed By:

EILEEN CARROLL
Deputy Director
Adult Programs Division

c. CWDA