



CDSS

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GOVERNOR

August 19, 2010

ALL-COUNTY LETTER NO. 10-39

TO: ALL COUNTY WELFARE DIRECTORS  
ALL IHSS PROGRAM MANAGERS

SUBJECT: ROLES AND RESPONSIBILITIES OF THE 78 COUNTY  
POSITIONS FOR CONDUCTING PROGRAM INTEGRITY/  
ANTI-FRAUD ACTIVITIES IN THE IN-HOME SUPPORTIVE  
SERVICES (IHSS) PROGRAM

REFERENCE: CFL 09/10-33 DATED OCTOBER 29, 2009; CFL 09/10-37 DATED  
DECEMBER 10, 2009; ACL 06-35 DATED SEPTEMBER 1, 2006;  
CFL 09/10-40 DATED DECEMBER 28, 2009; CFL 09/10-40E  
DATED APRIL 30, 2010; CFL 09/10-43 DATED  
DECEMBER 28, 2009; CFL 09/10-43E DATED APRIL 8, 2010

Reason For This Transmittal

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

This All-County Letter (ACL) clarifies the responsibilities of, and distribution methodology for, the 78 county positions established to conduct program integrity and anti-fraud activities in the In-Home Supportive Services (IHSS) program, as they differ from both Quality Assurance (QA) responsibilities and the responsibilities associated with county anti-fraud plans.

In October 2009, counties received an allocation as set forth in County Fiscal Letter (CFL) 09/10-33 for program integrity/anti-fraud positions. These positions carry responsibilities specific to the anti-fraud initiative, enacted pursuant to Assembly Bill (ABX) 4 19 (Chapter 17, Statutes of 2009) of the Fourth Extraordinary Session. These positions and their scope of responsibilities differ from those held by QA staff and from positions associated with the state-approved county anti-fraud plans. Each has a role in ensuring program integrity, including fraud prevention, detection, mitigation, and reporting within the IHSS program, yet they differ in responsibilities as shown below.

## **Program Integrity/Fraud Prevention, Detection, Mitigation, and Reporting:**

### Quality Assurance (QA) Staff

The IHSS QA program was established through Senate Bill 1104 (Chapter 229, Statutes of 2004), which outlined a number of enhanced responsibilities for CDSS and counties including: routine scheduled desk reviews, home visits, targeted reviews, general verification of receipt of services, third-party liability, and cooperation with data match and error rate studies. Most counties have been performing these activities since the program's implementation in 2004. QA activities must not be duplicated in other anti-fraud components. Further clarification can be found in ACL 06-35.

### 78 County Staff

The responsibilities associated with these positions are distinct from other fraud responsibilities, as they stem from the anti-fraud initiative. The duties of these staff are determined by each county based on need, and may include: conducting unannounced home visits, reviewing the results of criminal background checks, assisting as needed with the facilitation of provider orientations, reviewing a sample of provider timesheets, compiling and reporting fraud-related data, meeting with state and other designated staff regarding anti-fraud issues, and referring cases of suspected fraud in the IHSS program to the appropriate investigative agencies. These responsibilities supplement other anti-fraud and program integrity activities; however the activities must not duplicate other anti-fraud activities. Claiming instructions can be found in CFL 09/10-37.

### State-Approved County Anti-Fraud Plans

Counties choosing to participate must have a state-approved county anti-fraud plan on file with CDSS. Plans vary significantly from county to county, for example, a county's plan may establish a detailed or a simplified infrastructure to investigate and prosecute fraud. Please note, prosecution activities cannot be claimed consistent with federal fund matching rules as stated in CFL 09/10-43E, but the county's ability and willingness to prosecute fraud must still be outlined in the plan. Prosecution activities may be claimed to the Residual program using PC 330 (IHSS). Fiscal Year 2009/2010 plans include funding for positions carrying out responsibilities delineated in the approved plans. Responsibilities must supplement the anti-fraud and program integrity activities funded by a county's IHSS administration allocation and must not be identical to the responsibilities of other fraud components. Claiming instructions can be found in CFL 09/10-43.

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Attached you will find two charts. The first represents the number of new program integrity positions by county (Attachment 1). The second represents the delineation of responsibilities between the different components (Attachment 2).

If you have additional questions regarding this ACL, please contact the Adult Programs Branch, Operations and Quality Assurance Bureau at (916) 229-3494, or by email at [IHSS-QA@dss.ca.gov](mailto:IHSS-QA@dss.ca.gov)

Sincerely,

***Original Document Signed By:***

EILEEN CARROLL  
Deputy Director  
Adult Programs Division

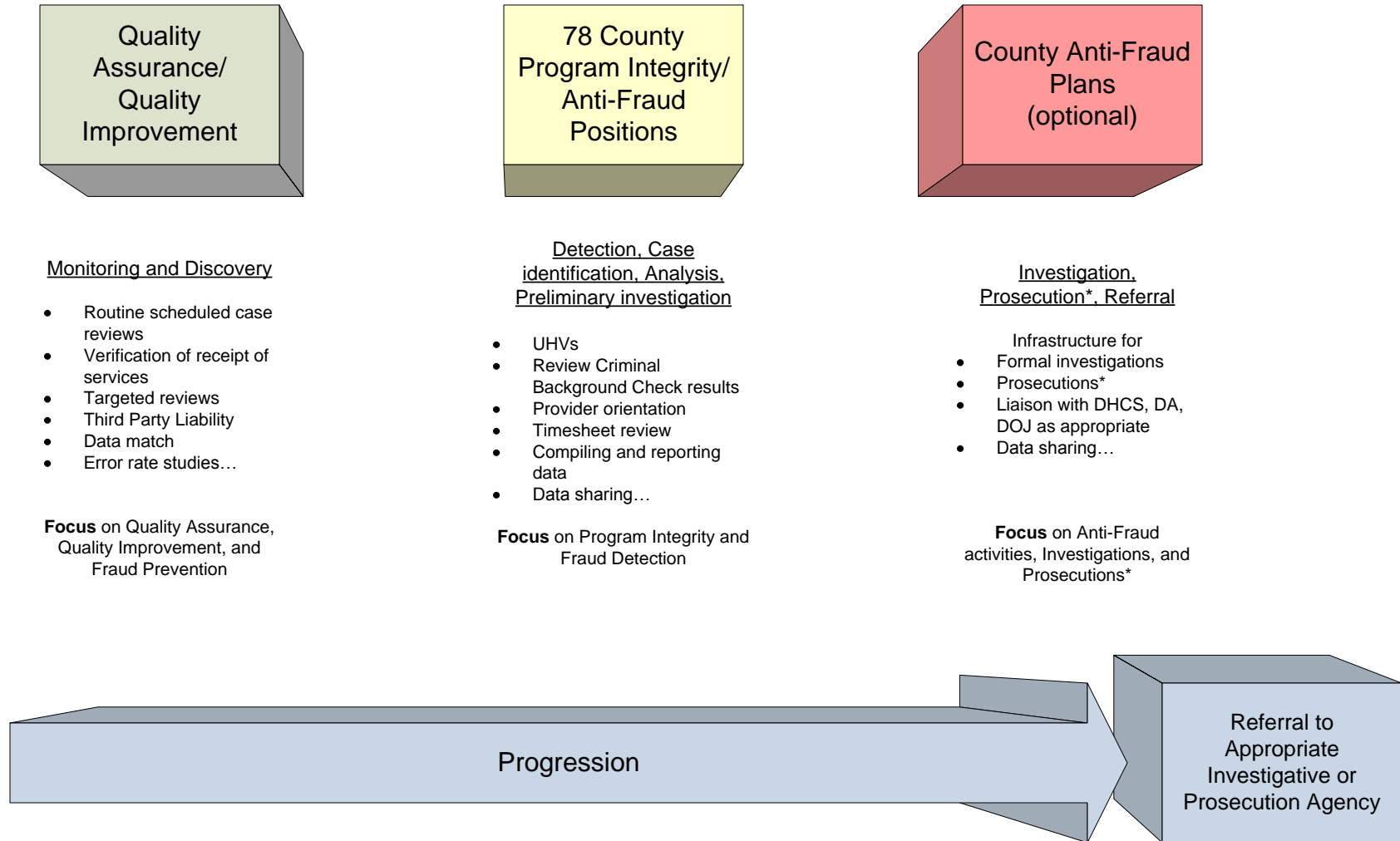
Attachments

## Attachment 1

County #	County Name	QA Staff	County Size	Program Integrity Staff
2	ALPINE	0.5	Very Small	0.5
26	MONO	1		0.5
46	SIERRA	1		0.5
14	INYO	1		0.5
25	MODOC	1		0.5
53	TRINITY	1		0.5
6	COLUSA	1		0.5
22	MARIPOSA	1		0.5
3	AMADOR	1		0.5
18	LASSEN	1		0.5
32	PLUMAS	1		0.5
5	CALAVERAS	1		0.5
8	DEL NORTE	1		0.5
55	TUOLUMNE	1		0.5
11	GLENN	1		0.5
35	SAN BENITO	0.5		0.5
47	SISKIYOU	1		0.5
29	NEVADA	1		0.5
58	YUBA	2		0.5
28	NAPA	1		0.5
9	EL DORADO	1		0.5
51	SUTTER	1		0.5
52	TEHAMA	1	Small	1
23	MENDOCINO	2		1
21	MARIN	2		1
17	LAKE	1		1
20	MADERA	2		1
40	SAN LUIS OBISPO	2		1
16	KINGS	2		1
12	HUMBOLDT	2		1
57	YOLO	2		1
31	PLACER	2		1
44	SANTA CRUZ	2		1
54	TULARE	3		1
45	SHASTA	1		1
48	SOLANO	3		1
42	SANTA BARBARA	2		1
41	SAN MATEO	2		1
24	MERCED	2	Medium	2
4	BUTTE	3		2
27	MONTEREY	3		2
56	VENTURA	3		2
15	KERN	3		2
49	SONOMA	2		2
13	IMPERIAL	2		2

County #	County Name	QA Staff	County Size	Program Integrity Staff
50	STANISLAUS	3		2
39	SAN JOAQUIN	3	Medium	2
7	CONTRA COSTA	3		2
10	FRESNO	3	Large	3
43	SANTA CLARA	3		3
33	RIVERSIDE	3		3
30	ORANGE	3		3
1	ALAMEDA	3		3
36	SAN BERNARDINO	3		3
34	SACRAMENTO	3		3
38	SAN FRANCISCO	3		3
37	SAN DIEGO	3		3
19	LOS ANGELES	7	Very Large	4
Totals:		<b>114</b>		<b>78</b>

## Delineation of Responsibilities Between QA/QI, PI/AF Positions, and County AF Plans



\*prosecution activities cannot be claimed consistent with federal fund matching rules as stated in CFL 09/10-43E