

June 4, 2020

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 20-64

This letter provides guidance to the counties on the use of telephonic signatures on SSP 14 as a temporary procedure in county General Assistance/General Relief (GA/GR) programs, approved by Social Security Administration for use during the COVID-19 emergency, for purposes of obtaining valid Interim Assistance Reimbursement authorizations.



KIM JOHNSON
DIRECTOR

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DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

June 4, 2020

ALL COUNTY LETTER NO. 20-64

TO: ALL COUNTY INTERIM ASSISTANCE REIMBURSEMENT (IAR)
PROGRAM MANAGERS
ALL COUNTY GENERAL ASSISTANCE/GENERAL RELIEF
(GA/GR) PROGRAM MANAGERS

SUBJECT: GENERAL ASSISTANCE/GENERAL RELIEF (GA/GR)
TEMPORARY COVID-19 EMERGENCY PROCEDURES FOR
ACCEPTANCE OF VOICE SIGNATURES ON SSP 14 FOR
INTERIM ASSISTANCE REIMBURSEMENT (IAR)

REFERENCE: [20 CODE OF FEDERAL REGULATIONS \(CFR\) §416.1902;](#)
[PROGRAM OPERATIONS MANUAL SYSTEM \(POMS\)](#)
[SECTIONS SI 02003.001, SI 02003.002, SI 02003.005\(B\)\(1\),](#)
[SI 02003.006\(A\)\(2\);](#)
[ALL COUNTY LETTER \(ACL\) NO. 16-41;](#)
[PROGRAM MANAGER LETTER DATED MARCH 20, 2020;](#)
[INTERIM ASSISTANCE REIMBURSEMENT \(IAR\) STATE](#)
[HANDBOOK §15\(D\).](#)

The purpose of this All County Letter (ACL) is to relay to the counties guidance provided by the federal Social Security Administration (SSA) regarding temporary Coronavirus (COVID-19) pandemic emergency procedures for the use of telephonic signatures on the SSP 14 for purposes of obtaining Interim Assistance Reimbursement (IAR) authorization from General Assistance/General Relief (GA/GR) claimants. Please note that the guidance in this letter does not apply to the Cash Assistance Program for Immigrants (CAPI). For instructions regarding temporary COVID-19 pandemic procedures for obtaining SSP 14 signatures in CAPI cases, please refer to the [CAPI Program Manager Letter dated March 20, 2020](#).

Background

Counties may obtain reimbursement for GA/GR and other cash or in-kind benefits paid out to a claimant in the following circumstances:

- The benefits were paid to the claimant to meet their basic needs (such as food, clothing, shelter, transportation, emergency medical needs, etc.) while awaiting approval of an application for Supplemental Security Income/State Supplementary Payment (SSI/SSP) ([Program Operations Manual System \(POMS\) §SI 02003.002\(B\)](#)); and
- The benefits paid to the claimant did not include any federal funds ([POMS §SI 02003.002\(A\)](#)); and
- The claimant authorized the county to recover IAR from their first SSI check ([POMS §SI 02003.001](#)) and the authorization is on file with SSA ([20 Code of Federal Regulations \(CFR\) §416.1902](#)); and
- The claimant subsequently receives SSI benefits for a month in which they received county assistance ([POMS §SI 02003.001\(A\)](#)).

The IAR authorization form jointly approved by SSA and the State of California is [SSP 14](#). An IAR authorization is valid if the SSP 14 is signed and dated by both the claimant and the county. ([POMS §SI 02003.005\(B\)\(1\)](#)). The SSP 14 expires every twelve months ([POMS §02003.006\(A\)\(2\)](#); [ACL No. 16-41](#)). If the SSP 14 is expired, IAR may not be collected by the county from the claimant's first SSI/SSP check unless a new authorization has been signed by the claimant and the county. If SSA audits a county's IAR program and discovers that the county has collected IAR from a claimant's initial SSI/SSP check when no valid authorization was in effect, SSA will require that the county refund that money to the claimant, regardless of the amount of GA/GR or other benefits previously paid to the claimant by the county. ([IAR State Handbook](#) §15(D)).

Temporary flexibility during COVID-19 pandemic emergency

Most counties require GA/GR claimants to sign application and redetermination forms and other documentation in person at a county welfare office. However, as a public health measure in response to the ongoing COVID-19 pandemic emergency, most counties have either closed their offices to the public entirely or have greatly reduced the services, hours, and locations accessible for in-person visits. While counties have the option of mailing forms to claimants to complete, sign, and mail back to the county, many GA/GR applicants and recipients, particularly those who are homeless, may be difficult to contact by mail. Accordingly, many counties have been completing GA/GR applications and redeterminations with claimants by telephone.

Valid SSP 14s must generally be signed with "wet" (pen and ink) signatures of the claimant and a county representative. However, due to the current COVID-19 pandemic emergency, SSA has agreed to allow telephonic attestations documented as electronic case journal entries in lieu of wet signatures. The SSP 14s signed in this manner will be deemed acceptable by SSA as valid IAR authorizations for GA/GR claimants. This flexibility is a strictly temporary measure on the part of SSA that will

remain in effect only as long as exigencies require. The California Department of Social Services (CDSS) will provide further guidance to the counties by a future ACL or All County Information Notice at such time that SSA alters or terminates the flexibilities described below.

County responsibilities – SSP 14 in GA/GR cases

For the duration of the COVID-19 emergency, SSA will accept telephonic signatures on SSP 14 from GA/GR claimants, provided that the county follows the four steps described below:

- The county phone interviewer must read to the claimant the information on the SSP 14 and obtain affirmation that the claimant intends to file the SSP 14 with Social Security Administration.
- The county phone interviewer must obtain from the claimant a verbal attestation affirming under penalty of perjury that the SSP 14 information provided by the claimant is correct.
- The claimant must verbally provide the county phone interviewer with specific permission and assent to sign the SSP 14 on the claimant's behalf.
- The county must document the above three items by typing them into a journal entry on the claimant's electronic case file.

A properly documented conversation with the claimant, as described above, will be acceptable to SSA as a valid signature on SSP 14 and will preserve the county's ability to collect any IAR to which it is entitled.

For questions or clarifications on the above information, please contact the Benefit Programs Unit in the CDSS Adult Programs Division at (916) 653-3850 or CAPI@dss.ca.gov.

Sincerely,

Original Document Signed By:

DEBBI THOMSON
Deputy Director
Adult Programs Division