

June 20, 2025

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 25-46

The purpose of this letter is to notify Public Authorities and counties of a new certification requirement due to changes to the [Federal Register, Vol. 89, No. 78](#) requiring changes to the Public Authority/Nonprofit Consortium Invoice (SOC 448) and the In-Home Supportive Services Contract Expenditure Invoice (SOC 432).



JENNIFER TROIA
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

June 20, 2025

ALL COUNTY LETTER NO. 25-46

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY WELFARE FISCAL OFFICERS
ALL COUNTY FISCAL OFFICERS
ALL IN-HOME SUPPORTIVE SERVICES PROGRAM MANAGERS
PUBLIC AUTHORITY EXECUTIVE DIRECTORS

SUBJECT: **NEW CERTIFICATION REQUIREMENT DUE TO CHANGES TO THE FEDERAL REGISTER, VOLUME 89, NO. 78, REQUIRING CHANGES TO THE PUBLIC AUTHORITY/NONPROFIT CONSORTIUM INVOICE (SOC 448) AND THE IN-HOME SUPPORTIVE SERVICES CONTRACT EXPENDITURE INVOICE (SOC 432)**

REFERENCE: [TITLE 2 OF THE CODE OF FEDERAL REGULATIONS](#)
[FEDERAL REGISTER VOL. 89, NO. 782, CFR 200.415\(b\)](#)

The purpose of this All County Letter (ACL) is to inform Public Authorities and counties of a new certification requirement for the Public Authority/Nonprofit Consortium Invoice (SOC 448) and In-Home Supportive Services Contract Expenditures Invoice (SOC 432) resulting from changes to the [Federal Register, Vol. 89, No. 78](#).

Background

[Federal Register, Vol. 89, No. 78](#) introduced changes to various parts of the Code of Federal Regulations (CFR), including [Title 2 CFR Part 25](#) (Unique Entity Identifier and System for Award Management), [Title 2 CFR Part 175](#) (Award Term for Trafficking in Persons), and [Title 2 CFR Part 200](#) (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). These changes became effective October 1, 2024.

The revised language to [2 CFR section 200.415\(b\)](#) is as follows (with additions in [bold])

(b) **[Subrecipients under the Federal award must certify to the pass-through entity whenever applying for funds, requesting payment, and submitting financial reports: “I certify to the best of my knowledge and belief that the information**

provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of [U.S. Code Title 18, section 2, section 1001, and section 1343](#) and [Title 31, section 3729–3730 and section 3801–3812](#).” Each such certification must be maintained pursuant to the requirements of [section 200.334](#). This paragraph applies to all tiers of subrecipients.]

Pursuant to the recent changes to [2 CFR section 200.415](#), subrecipients must make the above certification to the pass-through entity whenever applying for funds, requesting payment, and submitting financial reports.

Public Authorities and counties are subrecipients for federal funding received by the California Department of Social Services (CDSS), and CDSS is the pass-through entity for such funding. Therefore, Public Authorities and counties must certify the above statement to CDSS when submitting SOC 448 and SOC 432 invoices.

To comply with these changes, this language has been added to the SOC 448 and SOC 432. All invoices submitted after September 30, 2024, must be resigned and resubmitted to the Public Authority Unit (PAU). Public Authorities and counties will be contacted by their assigned PAU analyst with any invoices requiring new signatures.

If you have any questions or need additional guidance regarding the information in this letter, please contact the Adult Programs Division (APD), PAU at APD_PAU@dss.ca.gov. The inquiry will then be directed to the assigned PAU analyst for each county.

Sincerely,

Original Document Signed By

LEORA FILOSENA, P.M.P.
Deputy Director
Adult Programs Division