

December 18, 2018

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 18-XX

This letter is to inform counties that, commencing in Fiscal Year (FY) 2019-20, IHSS Anti-Fraud Plans will no longer be required for counties to administratively claim Title XIX Federal Financial Participation (FFP) for enhanced fraud prevention, detection, referral and investigation activities.

DRAFT



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DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

DRAFT

December 18, 2018

ALL COUNTY LETTER NO. 18-XX

TO: ALL COUNTY WELFARE DIRECTORS
ALL IHSS PROGRAM MANAGERS

SUBJECT: ELIMINATION OF IN HOME SUPPORTIVE SERVICES ANTI- FRAUD
PLAN REQUIREMENT

REFERENCE: [COUNTY FISCAL LETTER \(CFL\) NO. 09/10-43, DATED DECEMBER 28, 2009](#); [ALL COUNTY LETTER \(ACL\) NO. 10-39, DATED AUGUST 19, 2010](#); [CFL NO. 11/12-40, DATED FEBRUARY 15, 2012](#); [ALL COUNTY INFORMATION NOTICE \(ACIN\) NO. I-26-15, DATED APRIL 17, 2015](#)

PURPOSE

The purpose of this ACL is to inform counties that, commencing in Fiscal Year (FY) 2019-20, IHSS Anti-Fraud Plans will no longer be required for counties to administratively claim Title XIX Federal Financial Participation (FFP) for enhanced fraud prevention, detection, referral and investigation activities. This letter also advises counties that IHSS claiming instructions related to this letter will be provided in a forthcoming CFL.

BACKGROUND

The Budget Act of 2009 increased the IHSS appropriation by an additional \$10 million General Fund (GF) for fraud investigations and program integrity efforts. As outlined in [CFL No. 09/10-43](#), prior to claiming costs associated with IHSS enhanced anti-fraud efforts, counties were required to submit an Anti-Fraud Plan describing the county's proposed activities (supplemental to the anti-fraud and program integrity activities funded by the county's IHSS Administrative Allocation) to the California Department of Social Services (CDSS) for approval.

Once approved, counties were advised to utilize Anti-Fraud Plan Program Codes (PC) 740 (IHSS Non-PCSP/Plus Option Anti-Fraud Plan) and PC 741 (IHSS PCSP/Plus Option Anti-Fraud Plan) for costs associated with the plan's activities. The PC 740 was available for claiming costs related to non-Title XIX eligible activities specified in a county's approved Anti-Fraud Plan. Similarly, PC 741 was available for claiming all Title XIX eligible activities specified in a county's approved Anti-Fraud Plan. The codes included implementation activities related to the provision of fraud prevention, detection, referral, investigation, and program integrity. However, the activities were not intended to be duplicated by other IHSS activities or claimed to other IHSS codes.

ELIMINATION OF IHSS ANTI-FRAUD PLAN GENERAL FUND

The Budget Act of 2011 eliminated the GF portion for IHSS Anti-Fraud Plan costs ([CFL No. 11/12-40](#)). However, despite the lack of a GF allocation, counties were still allowed to draw down Title XIX FFP for relevant costs by claiming to PC 740 and PC 741 if they had a CDSS-approved Anti-Fraud Plan. The CDSS later reiterated this to counties, via [ACIN No. I-26-15](#).

ELIMINATION OF THE IHSS ANTI-FRAUD PLAN REQUIREMENT

Due to the elimination of the GF allocation, beginning in FY 2019-20, CDSS will no longer require counties to submit IHSS Anti-Fraud Plans to administratively claim Title XIX FFP for activities previously listed in county Anti-Fraud Plans. Accordingly, counties should cease claiming to PC 740 and PC 741, effective July 1, 2019. The CDSS will delete both PC 740 and PC 741 and issue new claiming instructions for the IHSS anti-fraud activities previously claimed to these PCs in a forthcoming CFL. Counties may submit all claiming related questions to fiscal.systems@dss.ca.gov.

For questions regarding this ACL, please contact the Adult Programs Fiscal, Appeals and Benefit Programs Branch, Program Integrity Unit at (916) 651-0554 or via e-mail at ihss-pi@dss.ca.gov.

Sincerely,

Original Document Signed By:

DEBBI THOMSON,
Deputy Director
Adult Programs Division