



July 9, 2019

Charissa S. Miguelino, Chief
Adult Programs Policy and Operations Bureau
Adult Programs Division
California Department of Social Services
744 P Street, Sacramento, CA 95814

SUBJECT: draft ALL COUNTY INFORMATION NOTICE (ACIN) NO. I-38-19, Reply due July 22, 2019

Ms. Miguelino,

The California In-Home Supportive Services Consumer Alliance (CICA) respectfully submits the below comments.

CICA represents 33 county Advisory Committees throughout the State of California and one organization. CICA is committed to improving and enhancing the lives of all those who use and provide In Home Supportive Services. CICA is committed to empowering recipients, family, friends, community members and providers by offering education, training and networking opportunities. CICA believes that building collaborations among IHSS Public Authority Advisory Committees, and all stakeholders, will strengthen the recipient voice to elected officials, policy makers, and the public.

Below are comments gathered by the California IHSS Consumer Alliance (CICA) for the draft ACIN No. I-38-19' Reply due July 22, 2019.

On page 3 of the ACIN:

An RV may meet the definition of “own home” if it has the necessary utilities needed to provide authorized IHSS (i.e. running water, electricity, heat, and appliances for the safe storage and preparation of food for meals) and can be situated in a single location for a period of time. Such locations can include a campground, RV park, or other private property. Please note, living in a tent or a vehicle (i.e. car) even in locations in which an RV would qualify as one’s “own home” (such as a campground or private property) would not qualify as living in one’s “own home” for purposes of IHSS because such a living arrangement does not provide the necessary utilities for providing IHSS, such as running water, electricity, cooking facilities, or restrooms.

It is important to recognize living conditions have changed for many the IHSS program can serve. Living in a tent or one’s vehicle (i.e. bus, van, car) is how many houseless (homeless) are living today. The need for necessary utilities for providing IHSS, such as running water, electricity, and cooking facilities, or restrooms should not be the disqualification of receiving IHSS. Consider the below for a houseless (homeless) person:

1. Need for Electricity: this can be dealt with daily by visits to local Houseless (homeless) shelters or Day Care Centers to meet daily needs.
2. Cooking Facilities: Often food is brought to individuals all-ready prepared or they attend facilities that provide meals, some serve one-a-day and some two-meals-a-day.
3. Restrooms: Not sure the need for restrooms besides relief one-self of their body waste, but shelters and day-care centers provide toilets and showers – assistance can be provided for both depending on the Consumer’s need and ability

Some responses received about the above were: Water can be received in bottles, food can be prepared over campfires or camp stoves, and the need for electricity can be met with generators.

There seems to be no recognition to needs of those who are out of their homes because of a disaster and living in tents or their private vehicles. It seems to be extremely detrimental to Consumers suffering from earthquake damage near Ridgecrest, or the recent fires. The population being referred to are those with the ability to live outside of institutions needing little assistance provided by the IHSS program.

Another subject that has brought concern was travel and vacation for the family. One's home while on vacation or travelling for business (personal or family member employment) maybe a tent on a camp out, or RV, or Hotel/Motel room, or after a disaster and the need to sleep away from the home, not in a shelter (by the way, if the shelter is established correctly more assistance may be needed). One's "own home" can temporarily change (this is like the houseless [homeless] population).

Please consider our suggestions in updating "draft ALL COUNTY INFORMATION NOTICE (ACIN) NO. I-38-19."

Thank you,

Charles Bean

CHARLES BEAN
Executive Director