



Kris Grasty – Director
5357 Truxtun Avenue
Bakersfield, CA 93309
(661) 868-1000; (661) 868-1001 FAX

October 20, 2009

Eva Lopez, Deputy Director
Adult Program Division
Department of Social Services
State of California
744 P Street
Sacramento, CA. 95814

RE: IHSS Provider Enrollment Requirements

Dear Mrs. Lopez:

I would like to thank the California Department of Social Services (CDSS) for this opportunity to express our concerns regarding the implementation of the new IHSS provider enrollment requirements. Since receiving the All County Letter (ACL 09-52) on October 1, 2009, Kern County has worked feverishly to meet the implementation deadline of November 1, 2009. In considering the resources, allocation, and timeframe provided, counties were not given sufficient time to implement accordingly. Like all other counties throughout the State, we are still waiting on further direction from CDSS on the revised content required for the new provider orientation. The orientations themselves require us to re-evaluate how we administer, deliver, and schedule orientations. This is critical because we anticipate an increase in the demand of providers (current and prospective) wanting to attend the required orientation. The increase in demand forces us to reallocate staff in an effort to provide additional provider orientation sessions. Additionally, like some counties, we need to receive approval from our Board of Supervisors in order to enter into agreement with the California Department of Justice to conduct criminal background checks, and receive criminal history information on our providers. This creates an additional obstacle, particularly in trying to place an item on a busy Board of Supervisors agenda.

Unfortunately, these issues are in addition to all the confusion that is occurring amongst our providers and clients regarding the changes we are implementing. The lack of time has limited our ability to properly inform the United Domestic Workers Union, providers (current and prospective), and clients that it will be impacting. Although the mandate is clear, the timeframe provided significantly hinders a county's ability to implement the new procedures which results in providers and clients unnecessarily being subjected to not only confusion and frustration, but poor service in light of the changes we are imposing on them.

Again, I would like to thank you for this opportunity. It is our hope that you would consider postponing implementation at least until December 1, 2009, or if possible the beginning of the following year. Your utmost consideration of our request is greatly appreciated.

Sincerely,

Kris Grasty
Director