

# Solano County Health & Social Services Department



Mental Health Services  
Public Health Services  
Substance Abuse Services  
Older & Disabled Adult Services

Eligibility Services  
Employment Services  
Children's Services  
Administrative Services

Patrick O. Duterte, Director

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Fairfield, CA 94533-6804

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October 23, 2009

Eva Lopez, Deputy Director  
Adult Programs Division  
California Department of Social Services  
744 P Street, MS 8-17-12  
Sacramento, CA 95814-05512

Dear Ms. Lopez:

This letter expresses serious concerns that Solano County has regarding the directives provided in All County Letter (ACL) 09-52, dated 10/1/09, which outlines new In-Home Supportive Services (IHSS) provider requirements mandated by legislation, to be implemented by counties effective November 1, 2009. Accordingly, Solano County has made diligent efforts to comply with all applicable directives regarding implementing changes to the provider enrollment process. However, Solano County is very concerned about the short implementation timeframe and the lack of information and instructions provided.

One of the major concerns is the requirement for providers to submit fingerprints and undergo criminal background checks. Due to the November 1 implementation date, there are no providers currently in compliance with the new mandates, and any new providers and current providers taking on new customers will need to be processed under the new guidelines. This will create a lag time in providing IHSS recipients with caregivers when needed, and could result in severely impaired recipients going without needed services.

Solano County is asking for specific instructions, training materials, and resources to implement provider enrollment in Solano County, we believe implementing this mandate on November 1, 2009 will have serious or potentially harmful consequences for our IHSS recipients. Not being able to hire a provider in a timely manner could present a huge safety risk to an elderly or disabled resident and jeopardize their ability to live independently in their home. We are requesting that the State allow us to continue with the "old" process until we have received clear instructions in regards to this new process and have had time to implement them. Further, we are requesting the state to approve a workaround in the CMIPS system to allow for us to implement this process.

In regards to providing orientation, we have not received the materials the state requires us to give to providers. Once we receive these materials, we will need time to develop our enrollment process, train staff, duplicate materials, and arrange for space to show the 45-minute video as we currently do not have sufficient space to perform this task.

Re: All County Letter (ACL) 09-52, dated 10/1/09

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CDSS has placed the County in an untenable position by requiring changes be made and providing incomplete and inadequate directions for implementation. It is impossible for the County to provide responsible and thorough customer service to a critically important segment of our population under these circumstances.

The County is in urgent need of clarifications and answers regarding the unresolved issues stated in this letter in order to move forward with implementation.

Sincerely,



Patrick Duterte, Director,  
Solano County Health & Social Services  
275 Beck Avenue  
Fairfield Ca, 94533

cc: Board of Supervisors .....  
Michael Johnson, County Administrator  
John Wagner, Director CDSS  
CWDA