



California Association of Public Authorities
for In-Home Supportive Services
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April 23, 2009

The Honorable Abel Maldonado
California State Senate
State Capitol
Sacramento, CA 95814

RE: SB 142 (Maldonado)
CAPA Position: OPPOSE

Dear Senator Maldonado,

The California Association of Public Authorities (CAPA) must respectively oppose your legislation, SB 142, which is scheduled to be heard April 28 in the Senate Human Services Committee. CAPA represents 52 Public Authorities and Non-Profit Consortia operating in 55 counties, each of whom serves as the local employer of record for the IHSS program and maintains the provider registry.

CAPA fully shares the impulse behind SB 142, which is to pursue reasonable measures to improve program integrity while eliminating any fraud. However, the bill's main provision, the requirement that all IHSS providers post start and stop times on their timesheets, seems unworkable at a basic level.

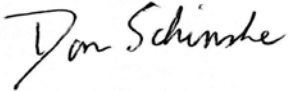
First off, the roll-out of the new timesheet appears pegged to the launch of CMIPS II. However, the timesheets being developed for CMIPS II, as currently planned (and funded), will contain fields allowing only for the tabulation of total hours, and not entries of exact times or the conversion of those times to work hours. It is unclear whether SB 142 is seeking a change in the specifications for CMIPS II, but we are concerned that such a change would delay implementation and require additional resources.

Even so, having providers enter start and stop times, convert the work blocks to hours and minutes, and then convert the totals to decimal entries, would seem to invite as much innocent error as it would discourage fraud. Much more extensive manual checking and follow-up would be required, at a time when the processing of timecards is poised to move toward electronic scanning. And the switch, at the very least, would require the delivery of some measure of instruction to the more than 800,000 providers and consumers that currently take part in IHSS – a significant undertaking all its own.

Because of these practical issues, CAPA must regretfully oppose the bill. However, we remain eager to work with the author and other policymakers on improving the program's integrity and

efficiency. IHSS is an ambitious, humane, and inspiring program that deserves not to be defrauded as much as it deserves not be apologized for.

Thank you for your consideration,

A handwritten signature in black ink that reads "Don Schinske". The signature is written in a cursive, slightly slanted style.

Don Schinske
Legislative Advocate

cc. The Honorable Carol Liu, Chair
Senate Human Services Committee
Members, Senate Human Services
Jack Hailey, Senate Human Services
Mary Tinker, Legislative Chair, CAPA
Bernadette Lynch, Board President, CAPA
Trula LaCalle, Executive Director, CAPA