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GAVIN NEWSOM
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December 30, 2024

SENT VIA EMAIL TO KOTHARIC@SACCOUNTY.GOV

Chevon Kothari, Deputy County Executive
Sacramento County Social Services Agency
700 H Street, #7650
Sacramento, CA 95814-1280

SUBJECT: SOCIAL SECURITY ADMINISTRATION AUDIT OF SACRAMENTO
COUNTY INTERIM ASSISTANCE REIMBURSEMENT PROGRAM

Dear Chevon Kothari:

This letter is to notify you that the San Francisco Regional Office of the Social Security Administration (SSA) has completed its audit of the Sacramento County Social Services Agency Interim Assistance Reimbursement (IAR) program.

As part of the SSA audit of Sacramento County, SSA selected and reviewed 11 random cases from October 2022. Based on this sample, the audit found that Sacramento County complied with the agreement between SSA and the California Department of Social Services (CDSS). We commend Sacramento County staff for a successful audit and encourage their continued diligence.

Although no corrective action is required regarding this audit, CDSS requests that Sacramento County respond with a brief letter to CDSS via email to Steven.Koehler@dss.ca.gov, no later than **January 21, 2025**, acknowledging Sacramento County's successful audit. This will allow both CDSS and SSA to maintain complete records of the audit process.

For questions regarding this letter, please contact Steven Koehler, Manager of CDSS', Adult Programs Division, Benefit Programs Unit, via email at Steven.Koehler@dss.ca.gov.

Sincerely,

LEORA FILOSENA, P.M.P.
Deputy Director
Adult Programs Division

Enclosure

cc: Gina Delgado
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NARRATIVE REPORT

The Interim Assistance Reimbursement (IAR) provisions of the Social Security Act permit state and local interim assistance (IA) agencies to recover retroactive Supplemental Security Income (SSI) payment from an individual for the amount of IA the agency provides for meeting basic needs while the individual's SSI application is pending, or SSI benefits are suspended or terminated and subsequently reinstated.

In 1989, the State of California revised the IAR authorization to allow for reimbursement between California counties. The State outlined and the Social Security Administration (SSA) agreed to the following process for inter-county reimbursement. The IA agency that receives the IAR check is responsible for disbursing the funds including completing the accountability report, sending the other IA agency their share, and sending the Notice of Action and the excess of the IAR check to the individual within the ten working day requirement.

The SSA regional offices periodically conduct sample reviews of state/county accounting records of paid IAR cases. The purpose of the reviews is to provide oversight of state/county and federal IAR accounting procedures.

In March 2024, SSA's San Francisco Regional Office notified the Sacramento County Social Services Agency that the regional office would conduct a mail sample review of the October 2022 IAR payments made to Sacramento County.

Review Procedure

We reviewed 11 cases for the sample month of October 2022. To obtain sample data, we reviewed the SSI, IAR Activity List for October 2022.

Acronyms used in this Report

IA	Interim Assistance
IAR	Interim Assistance Reimbursement
SSA	Social Security Administration
SSI	Supplemental Security Income

Completion of Interim Assistance Reimbursement Authorization by Interim Assistance Agency

The IAR authorization is an individual's permission in writing for SSA to withhold his or her initial retroactive SSI payment and repay the IA agency for interim assistance the agency gives the individual while the individual's SSI application is pending, or SSI benefits suspended or terminated and subsequently reinstated. It is important to indicate whether the authorization is for an Initial Claim case or a Post Eligibility case by using the correct authorization or checking the Initial Claim or Post Eligibility boxes on a

multipurpose authorization [Form SOC 455](#). When in doubt as to whether the individual is a new applicant or in suspense status, the IA agency should have the individual sign an Initial Claim authorization because of the protective filing considerations. When in doubt as to whether the individual is a new applicant or in suspense status, the IA agency should have the individual sign an Initial Claim authorization because of the protective filing considerations.

The State has opted to include protective filing language on the IAR authorization. The SSA establishes the protective filing date for SSI eligibility in Initial Claims as the date the IA agency receives the Initial Claim IAR authorization. Therefore, an IA agency representative must sign and date the agency's portion of the signature line of the authorization.

An authorization is effective for reimbursement purposes when SSA receives the authorization or electronic notification from the State that it has received an authorization. In addition, if the State does not notify SSA within thirty days of the date the individual signed the authorization, the authorization is not binding on the applicant. The authorization remains in effect for one year from the date received by the State unless the individual files an application for SSI benefits. Once the individual files the application for benefits, the authorization will cease to have effect when:

- The SSA makes the first retroactive SSI payment on the individual's application or the SSA makes the first retroactive SSI payment following the termination or suspension of the individual's benefits, or
- The SSA makes a final determination on the individual's claim, or
- The individual and the State terminate the authorization.

Review Findings

Sacramento County Social Services Agency completed the authorization forms accurately.

Completion of the Notice of Action

The SSA regulations require that the State (i.e., IA agency) send the individual a written notice explaining the amount of the payment received from SSA; the excess amount due the individual, if any; and the individual's right to a hearing if he/she disagrees with the State's action regarding the apportionment of the IAR check. After the State receives the IAR payment through direct deposit, the State must prepare an apportionment notice to the recipient within ten working days from the date the State received the IAR payment.

Review Findings

Sacramento County Social Services Agency sent the Notice of Action with the required information for all the cases timely.

Computation of Reimbursable Interim Assistance

Federally reimbursable IA is assistance wholly funded from state or local payments. The SSA will not reimburse the state for payments made wholly or partially from federal funds.

For Initial Claim cases, the IA agency may only recover interim assistance paid during the period beginning with the first month for which the individual received an SSI payment and ending with (and including) the month of payment. For Post Eligibility cases, the IA agency may only recover interim assistance paid beginning with the first day for which the individual's SSI payments were suspended or terminated, if the individual was subsequently found to have been eligible for and received such payments and ending with (and including) the month payment is made.

Review Findings:

Sacramento County Social Services Agency computed and retained the correct IAR amount.

Recommendations for the IA Agency

Based on this review, we have no recommendations. Sacramento County Social Services Agency is following the IAR processing procedures.