

**County of Orange Social Services Agency
Family Self-Sufficiency & Adult Services Division**

Program/Area: Adult Services/In-Home Supportive Services
Title: Telehealth Reassessment Policy
Number: 1047 **Status:** Final
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Approved: Signature on file

PURPOSE To provide In-Home Supportive Services (IHSS) staff guidelines regarding Telehealth Reassessment (TRA) regulations.

POLICY A TRA is available to all eligible IHSS recipients who elect to participate in a telephone or video call instead of an in-person needs assessment.

BOOKMARKS

- [Background](#)
- [TRA Eligibility](#)
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BACKGROUND On March 4, 2020, California declared a State of Emergency due to the COVID-19 pandemic. In response, the IHSS program authorized all counties to conduct needs assessments and reassessments (RAs) via telephone or video under specified circumstances. Following the announcement of the end of the State of Emergency on February 23, 2023, the IHSS program transitioned back to in-person needs assessments and RAs. On October 8, 2024, the California Department of Social Services (CDSS) implemented a permanent TRA process, providing flexibility for recipients and counties.

TRA ELIGIBILITY IHSS recipients will be assessed for TRA eligibility prior to each RA. To qualify for a TRA, the recipient must meet all the following criteria:

- Received an in-person intake assessment
- Received at least one in-person RA
- Meet stable care needs or stable care needs exception
- Have not received two (2) consecutive TRAs
- Agree to participate in a TRA
- Utilize the technology needed to successfully participate in a TRA either independently or have access to someone to help them

Recipients who qualify for a TRA will retain the right to choose an in-person RA.

STABLE CARE NEEDS

To qualify for stable care needs, recipients must meet all the following criteria:

- **Age:** Must be 19 or older; Minors are ineligible due to evolving care needs. A minor who turns 18 should have at least one in-person RA after their 18th birthday before they are eligible for a TRA.
- **No Safety Incidents:** No known incidents involving Adult Protective Services (APS) or other agencies responsible for investigating the health and safety of individuals since the last RA
- **No Health or Fraud Concerns:** No documented safety issues or suspicion of fraud since the last RA
- **No Recent Hospitalization:** No hospitalization, admittance to an overnight care facility for 24 hours or more, frequent emergency room or urgent care visits within the last three (3) months
- **Consistent Provider Services:** No gaps in provider services in the past six (6) months
- **No Residence Change:** No change in residence since the last RA
- **Memory, Orientation, and Judgment (MOJ):** Recipient either:
 - Lives alone and does not need assistance with MOJ **or**
 - Lives with others when assistance is needed with MOJ. Recipients who need assistance with MOJ and who live with others have access to additional supports in the home which contribute to their stability and are determined to have stable care needs.
- **Self-Reporting Ability:** Recipients must be able to self-report care needs without full reliance on an Authorized Representative (AR) who directs all aspects of the recipients' care. A recipient who requires their AR to set up a video call due to their limitations but can answer questions during the RA is eligible for a TRA.
- **No Protective Supervision Assessment Needed:** The recipient doesn't need an assessment or RA for protective supervision.
- **No Complex Paramedical Care Needs:** Only standard paramedical services are allowed. The following complex paramedical care exceed standard paramedical services would exclude a recipient from a TRA: administration of medications, gastrostomy tube care and maintenance, respiratory care and maintenance, digital stimulation and stool removal, catheter care, insertion of enemas, ostomy care, passive range of motion exercises, and blood glucose and urine testing.

If during the TRA, it is found that the recipient no longer has stable care needs, the appointment must be rescheduled for an in-person RA.

STABLE CARE NEEDS EXCEPTION

Exception to the stable care needs criteria allows recipients that receive case management through other support programs to qualify for a TRA, even if they do not meet all standard criteria mentioned in the definition of [Stable Care](#)

[Needs](#) above. To qualify under this exception, recipients must meet all the following criteria:

- Be at least 19 years old
- No known incidents involving APS or other agencies responsible for investigating the health and safety of individuals since the last RA
- No hospitalization, admittance to an overnight care facility for 24 hours or more, frequent emergency room or urgent care visits within the last three (3) months
- No change in residence since the last RA
- No documented safety issues or suspicion of fraud since the last RA

A recipient who is documented as receiving case management through another program and meets the exception criteria above, is considered to have stable care needs due to the additional support provided by case management. The additional support provided by case management helps stabilize their care and would be eligible for a TRA without meeting the definition of [Stable Care Needs](#) above. The IHSS program must contact and verify the additional support and document current case management involvement and the case manager's contact information.

Qualifying case management programs that help stabilize a recipient include but are not limited to:

- Regional Center Supported Living Services,
- Multipurpose Senior Services Program,
- Home and Community-Based Alternatives Waiver (formerly In-Home Operations Waiver), and
- Enhanced Care Management.

STATE OF EMERGENCY

During a State of Emergency, all impacted recipients will receive a Telephonic TRA, regardless of whether they meet the stable needs criteria or if it results in consecutive TRAs. In compliance with federal regulations, recipients must be offered the option of an in-person RA. If a recipient prefers an in-person RA, they will first receive an initial TRA during the State of Emergency, followed by an in-person RA as soon as feasible or upon the conclusion of the State of Emergency, whichever occurs first.

REFERENCES

[All County Information Notice \(ACIN\) I-82-17 – In-Home Supportive Services \(IHSS\) Assessment Clarifications and New or Updated Tools](#)

[All County Letter \(ACL\) 15-25 – Protective Supervision Clarifications](#)

[All County Letter \(ACL\) 24-72 Implementation of the In-Home Supportive Services Program Telehealth Reassessment Option](#)