

**Supplemental Nutrition Assistance Program
Program Access Review
Of
State of California
Health and Human Services Agency
Department of Social Services
San Diego County**

November 30-December 18, 2009



**United States Department of Agriculture
Food and Nutrition Service
90 Seventh Street
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San Francisco, California
94103**

PROGRAM ACCESS REVIEW
San Diego County
FINAL REPORT
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ACRONYMS

BPR.....Business Process Reengineering

FFY.....Federal Fiscal Year

FNS.....Food & Nutrition Service

SNAP.....Supplemental Nutrition Assistance Program

PAR.....Program Access Review

QC.....Quality Control

USDA.....United States Department of Agriculture

WRO.....Western Region Office

DEFINITIONS

ACCESS: San Diego Call Center

Best Practices: Exemplary methods or processes being used in one office or State that could be replicated in other offices or States.

Business Process Reengineering: County initiated changes to the procedures for administration of the SNAP program.

Corrective Action: Actions proposed or taken by a State or local agency to change or improve operational effectiveness.

Finding: Identification of non-compliance with program regulations, policies, and procedures. A corrective action is required.

Observation: Identification of a weakness involving management practices or unregulated activity. A suggestion for an alternative action is provided.

Program Access: Project designed to decrease barriers to the Food Stamp Program and increase participation among those who are eligible.

Recommendations: Statement of actions that address observations made in the review. These actions may or may not be required.

Required Corrective Action: Statement of actions that must be taken to correct non-compliance with regulations and with established policies and procedures. These actions may be prescribed or the State may be required to determine the actions to be taken.

Part One: Program Access Review Outcomes

The Federal Fiscal Year (FFY) 2010 Supplemental Nutrition Assistance Program (SNAP) Program Access Review (PAR) was conducted in San Diego at the North Coastal Office November 30-December 4, by Veronica Brown, Program Specialist at the Food and Nutrition Service (FNS), Walter Zaumseil, State Program Officer at FNS, and Taadhimeka with California Department of Social Services (CDSS). The onsite reviews of the North Central and South Offices were conducted December 14-December 17 by Veronica Brown, Program Specialist, Walter Zaumseil, State Program Officer, Hope Rios, State Program Officer, Dawn Baker, Quality Control Team Leader, Kathryn McQueen, Program Specialist, and Paul Arce, Program Specialist, all with FNS, and Frances Draper with CDSS. In addition, Dominic Pagano, Civil Rights Program Specialist, and Joe Torres, Civil Rights Director, conducted a concurrent Civil Rights review of all three offices.

During the review, FNS interviewed local office staff and clients, reviewed 280 case files, observed office procedures and met with two outside agencies. At the time of the review, the local offices, known as Family Resource Centers (FRC), were completing the first phase of an Eligibility Business Process Reengineering (BPR) project. The BPR was initiated by the Board of Supervisors to increase access to the SNAP program by providing “same day” service to clients. The County’s goal is to process all new applications to the fullest extent possible on the same day the application is received. Same day application processing was made possible by the implementation of a new task based model that includes document imaging and the creation of a call center. The plan began in March 2009 with the creation of ACCESS, San Diego’s call center. The North Central FRC began the office conversion on April 1, 2009 with the document imaging of all case files. The first stage of the BPR ended with the final conversion of the North Coastal Office in October 2009 and the full implementation of ACCESS in November 2009. The target date for the full implementation of the Task Based and the Same Day Application model at all FRCs is May 31, 2010.

Because of this recent reengineering effort, the review assessed the effect of the new business processes on worker efficiency, client access and customer service. Reviewers observed that some of the new processes seem to present barriers to applying households as well as ongoing households. In order to complete their application, interview, finger imaging or quarterly report requirements, applicants had to visit their local FRC multiple times to ensure required documents and verifications were received. This included submitting applications for benefits, submitting and resubmitting lost verifications, obtaining their EBT cards, completing SFIS finger imaging requirement and submission of their QR7 quarterly report forms. In particular, the South FRC required applicants to schedule a separate appointment in order to complete the SFIS portion of the application process, effectively requiring two appointments to receive benefits. While the appointment is better than having clients wait to be finger imaged, it does result in an additional visit to the office.

The Face to Face (F2F) waiver was in the process of being implemented and had not been expanded at the time of the review to cover all hardships. Some staff and managers were unaware of the waiver, and waiving the interview required a cumbersome supervisory approval that further delays the process. Unneeded steps in application processing further complicate the application process; one such step is Project 100% which creates additional delays and barriers to participation in how it is administered. With respect to the SFIS requirement, San Diego County does not take advantage of the State policy that allows the agency to postpone SFIS.

The adoption of the document imaging system (DoReS) has not gone smoothly, and is being implemented as it is being developed. The agency's imaging processes are being streamlined as greater familiarity with it develops and its role is being better understood. The document imaging work flow is complicated and further burdened by the required number of verifications and the frequency of quarterly reports (QR7s) that are required to be processed. These documents and this process constitute a significant work effort for the County. Further increasing the difficulties encountered as part of the imaging process, are routing inefficiencies of the mailrooms, of the drop boxes and of the reception desk; resulting in paperwork being lost or misplaced before it can be imaged, thereby increasing office visits as clients attempt to replace lost documents.

BUSINESS PROCESS REENGINEERING

The review examined the actual process of the reengineering effort as well as the effect of the specific changes-- Same Day Service, ACCESS call center, and document imaging. The report will first deal with the process and then the specific components.

The implementation of the BPR has been successful in decreasing case backlogs with improved scheduling and same day interviews, but unneeded steps in application processing complicate the application process and cause delays. Reviewers were impressed with the Refugee Assistance Program (RAP) at the North Central FRC which has successfully implemented all aspects of the BPR and provides excellent service to its refugee clients. Except for the refugees processed by RAP, serious barriers to access remain for all applying households as well as all ongoing households. FNS would expect that once the BPR is fully and properly implemented, all households in San Diego County will receive at least the same level of service that is provided to the small refugee community processed by RAP.

FNS observed that the BPR process for managing documents has not significantly decreased the volume of paper within each FRC. The imaging process has not been adequately streamlined and the EWs are still dependent on paper files. In some cases, new applications are still being placed in 10-day files for EW processing and required verifications for ongoing cases are not imaged soon enough to be used. The imaging process is seriously hampered by the volume and frequency of the required verifications and other documentation

FNS also noted a potential disconnect between the FRC managers at North Coastal and North Central and their front office staff. Management does not seem tuned into what is happening below the supervisory level and believes that the transition is going well. On the other hand, workers and clients expressed frustration with the new processes citing lost paperwork and difficulty in phone contacts. In contrast to the northern FRCs, the South FRC is aware of their ongoing problems and has taken steps to address the issues under their control by adjusting some processes.

In general, we are concerned that the Business Process Reengineering effort as it has been implemented will not produce the desired results in improved customer service or workload reduction due to several choke points within the system. San Diego could decrease client office visits and increase access by reducing required verifications, making greater use of the face to face interview waiver, improving mail and drop box routing processes, and the development of self-help mechanisms in lobbies for clients. ACCESS must increase its capacity, develop evaluation standards for call duration and continue to expand the tasks it performs to completion to offset the impact of the movement of Eligibility Workers from the FRCs to the call center.

In order to verify that the BPR is being successfully implemented, Managers and Supervisors need to develop worker performance standards and increase the minimum sampling for determining worker performance on the task based system. The County should consider visiting states that have successfully implemented document imaging, call centers and task based systems, like Washington State, which has enabled it to meet rising demand while maintaining high performance standards. Most importantly, the County should ensure the involvement of all levels of HHSA, as well as other stakeholders, in the development of the revised business processes to ensure the most efficient choices for workers and clients.

Recommendations for the BPR

- Managers and Supervisors need to institute a more effective system for determining and monitoring the success of the BPR and making effective adjustments where possible and recommending changes for the countywide processes.
- Proactively communicate the BPR strategy to staff, community partners, and clients. Provide updates and solicit feedback on the BPR from all involved parties.
- Regularly include local and State staff in ongoing development, planning, and implementation of the BPR model.
- Network with other states such as Washington that have or are in the process of transforming their business model. At a minimum, include discussions with states that addressed organizational and cultural changes that focused on customer needs, resolution at first point of contact, and high productivity gains with less waste and unnecessary process.

SAME DAY PROCESSING

Same Day Processing begins with applicants waiting in line to be screened by the Office Assistants (OA) to confirm that their applications are complete and to check for eligibility to expedited service processing. If the application is not complete, the OA works with the client to obtain any missing information. The application is then logged into CalWin and sent to a queue for assignment to an Eligibility Worker. Once the application has been received, date stamped and a receipt issued for all documents submitted, the client is told to take a seat and wait to be seen by the first available eligible EW.

The same day interview is a major change in the application process and has the potential to greatly improve client service. Currently, the wait for the interview can take two to four hours depending upon the time of the month. The wait time due to lobby congestion at the reception desk is further exacerbated by the number of clients who are returning to drop off documents, complete the SFIS process for approval, talk to a worker about their case, or to pick up an EBT card. While there are separate lines for the various activities, the number of people coming in does cause congestion and may deter some applicants. The long office waits for initial intake and the interview can also result in some applicants leaving before they can be seen by a worker. The wait time is especially difficult for parents with small children, working families who must take time off to come to the office, and the elderly.

There also seems to be some confusion about the process for handling applicants who are unable to wait for a same day interview. Some office staff reported that such clients are given a set appointment, while other staff indicated that the client is told to return the next day and they will be assigned an appointment on a first-come, first-served basis. We were unable to obtain detailed procedures for the new processes and believe this may be causing confusion for the workers and results in an uneven implementation of the BPR.

While the BPR attempts to develop the same standards for all FRCs, there are some differences in implementation depending on when the FRC initiated the BPR and FRC facility capabilities. Of the three FRC's reviewed, the North Central FRC was the first office to implement the BPR in April 2009, followed by South FRC and finally the North Coastal FRC converted to same day processing October 15, 2009. Besides being the first FRC to convert to the BPR, the North Central FRC also has the advantage of being housed in a new complex that was built to accommodate traffic flow issues including a reception desk that allows face to face interaction, a sufficient waiting area and a choice of open or closed interview rooms. The North Coastal and South FRCs do not have these capabilities and the efficiency of their operations is hampered by facilities that do not accommodate the application and interview processes. Both North Coastal and South FRCs have glass partitions that separate the receptionist from the client. The North Coastal also lacks a speaker system at the window requiring both parties to shout their information in order to be heard, raising privacy issues. Both North Coastal and South FRCs have inadequate waiting rooms that cause crowded conditions. The North Coastal FRC was reviewed at the beginning of the month with the Office Manager reporting that

over 1000 clients visited the office on November 30. The crowded conditions at North Coastal FRC were exacerbated by the high number of mothers with infants and small children whose strollers and baby carriers were often seen blocking doorways and aisles. In an effort to escape the overcrowding, North Coastal clients often wait outside, or in the case of South FRC, clients are told they can wait in the Cantina, a café in the building complex. Whether waiting outside (North Coastal) or in the Cantina (South) both FRCs lack the ability to notify clients not in the waiting room that the EW is ready for their appointment. As a result, no clients were observed to be waiting in the Cantina for fear they would miss the appointment.

Another related issue at the South FRC is the practice of paging clients and asking/requiring them to call their EW on the ACCESS phone to conduct business. However, the page is not always clear so Reception has to page the EW (over the intercom system) and ask him or her to repeat the page. The South FRC has only two house phones and a pay phone in the lobby for all clients to contact ACCESS and their EW (when paged). The South FRC considers the payphone available to call ACCESS, toll free, but there is no sign informing clients that it is a toll free call. Interviewed clients indicated they used their cell phones.

All three FRC managers stated that they responded to periods of increased traffic by assigning EWs to the lobbies to assist clients with their applications. The County has also addressed the issue of clients applying to the “wrong” office by instituting a “No Wrong Door” policy which requires the FRCs to accept all applications, but then re-route applications to the correct office via inter-office mail which can create a delay. (Note: An option used in some other locations is to go ahead and process the application but then transfer the case to the correct office after approval.) The South and North Central FRCs also have a designated window for addressing specific questions. All three FRCs also have a strong process for providing in-house language services for the most common foreign languages in San Diego County; Spanish and Tagalong. The specifics of San Diego’s response to less common languages are addressed in the FNS Civil Rights Review.

All FRCs state that they are open to accepting applications until the offices close at 5:00 PM with the last time to schedule an interview between 3:30-4:00 PM. We were also advised that all late applications turned in after the cut-off period should be scheduled for a 9:00 AM interview, but there is some confusion over this issue with some reception staff stating that clients are told to return the next day and wait in the reception line to schedule the interview on a first-come first-served basis. FNS staff also observed that the North Central guard denied entrance to FRC clients after 3:30 PM. When FNS staff asked for clarification, the guard stated that they were instructed to deny late entrance by FRC staff. The North Central FRC Manager assured FNS staff that this was an isolated incident and not standard office procedure. FNS notes that this incident seems to support the contention of some clients and advocate groups that this is a routine practice for many FRCs.

FNS is pleased to see that the County is waiving the Face-to-Face (F2F) interview for all seniors and disabled persons without earnings. We understand that the F2F waiver will soon be implemented for recertifications and for working adults. We look forward to San Diego's expanded implementation of the F2F interview waiver as it should assist clients and help to decrease the office traffic within all FRCs. We also encourage more consistent use of the F2F interview waiver with all hardship cases such as families with small children, working families and those with transportation issues. However, the FNS reviewers note that the success of the F2F interview waiver is dependent on the ability of the FRCs to make necessary improvements in several areas that are discussed later in the report- 1) efficiently manage paper flow by ensuring documents are reliably received and stored in a retrievable manner, 2) decreasing the amount of required verification and 3) streamlining the document imaging process.

FNS is aware that the California Department of Social Services (CDSS) plans to issue an All County Letter soon with guidance for reducing verification. We encourage San Diego HHSA to review the verification required to eliminate duplications and any items that do not contribute significantly to payment accuracy as doing so will contribute significantly to increasing efficiency of the San Diego BPR and greatly enhance customer service.

Recommendations Regarding Same Day Service

Commending San Diego HHSA

- We commend San Diego HHSA for implementing the Same Day Service policy and addressing the need for a "No Wrong Door" Policy. However, we encourage the County to consider an expanded policy to accept and process applications at whatever office the applicant first contacts.
- We look forward to the expanded implementation of the Face to Face interview waiver as a major component of the plan to improve access and streamline operations.

Recommendations

- The BPR needs to be consistently implemented among offices and workers within each office by developing detailed procedures for handling applicants with a focus on increased customer service and streamlining processes to facilitate expeditious delivery of benefits.
- All FRCs should look into implementing a walk in numbering system for clients to reduce waiting lines, thereby allowing clients to take a seat instead of standing.
- The County should look into expanding the F2F interview waiver as broadly as possible. We also encourage the County to use the F2F interview waiver as an option for those applicants they are unable to interview on the initial day of contact.

- The County should review and reduce the verification required to only the minimum necessary as this will greatly alleviate the burden on clients and office processes.
- All FRCs should be encouraged to use the option allowed under current State regulations to postpone finger imaging (SFIS) until recertification.
- Consider revising the application intake process to have eligibility workers as the first point of contact for clients rather than clerical staff. This has been an effective tool to increase efficiency in other states such as New Mexico.

Findings

- All FRCs must follow SNAP policy for scheduling appointments for a set time and not advise applicants to return on a first-come, first served basis.
- All FRCs must enforce the SNAP policy for accepting and date stamping all completed applications until the office is officially closed.

Document Imaging

More needs to be done to streamline the document imaging system, including reducing the number of required verifications which contributes to the large volume to be imaged. Currently, all documents received by walk-ins, through the drop box or mailed to the FRCs are processed by the Office Assistants (OA). The OA then forwards documents to the scanning unit where they are imaged. If there is a delay in imaging, EWs will work with the paper files until the case is completed and then the file will be sent to imaging. The South FRC has opted to work with the paper files until imaging is streamlined and completed more quickly.

Several issues arose with the county imaging system during the review including EWs still relying on paper instead of imaged documents, files not adequately labeled or indexed in DoReS making them difficult to find, imaged documents indexed with the date they were scanned rather than the date received, and there was no indication of what documents are being scanned. FNS observed some troubling situations in certain offices. The North Coastal FRC's mass imaging conducted prior to August 2009 failed to capture all documents. Many of these files were subsequently shredded without verifying that they had been captured in the system. All three FRCs routinely lose documents which contributes to multiple trips to the FRCs by clients to submit and often resubmit lost verifications or other documents. A possible measure to reduce the number of workers who touch the documents prior to imaging would be to position the document imaging scanners at the reception desk instead of in the back office. Another possible solution that has worked well in other areas is the creation of a self-service lobby that would allow clients to scan their own documents.

Recommendations

- Position scanners at reception to immediately image files or put scanners in the lobby for self service use by clients.

- Documents need to reflect the date received from clients, not the date scanned (or no date).
- The document imaging system, DoReS, does not have an indexing system to make it more usable. The County should develop and consistently use clear indexing standards to facilitate retrieval of information.
- Review verification and documentation needed to reduce the volume of scanned documents.
- For modifications to the current model, select the best development process that will create capacity, involve the end user, and prepare the workforce for change.
- Measure expected productivity gains and make them visible.
- Include focus on culture and manage staff expectations before changes impact them.

ACCESS Call Center

FNS staff visited the Call Center/Voice Response Unit (ACCESS) to observe the facility's operations and the call center processes. During that visit FNS met with the call center manager and observed the call center staff, processes and automation. Discussions between ACCESS management and FNS clarified that the call center was not adequately staffed and did not have enough lines, currently 140 lines, to accommodate the number of calls received. To evaluate this, FNS staff called ACCESS to gauge customer access to the program. The FNS callers failed on numerous occasions or had extreme difficulty reaching a live person. The automated response system would inform the caller that all lines were busy, to call back later and then drop the call. Once FNS staff was able to reach the ACCESS center it was noted that the workers were friendly and knowledgeable. Because of the ACCESS system's limitations, there is, at this time, no way of knowing the number or percentage of calls that are automatically being dropped by the system when all lines are in use.

The lack of sufficient telephone lines and staff explains why ACCESS is not working at required capacity. We found that there are an undetermined number of rejected calls (caller told to call back later). The average wait time to speak to an agent in December 2009 was 20 minutes and the average wait time before a client abandoned their call was 10 minutes. Those callers that were able to get through to an agent could not always get answers to their questions or have changes made to their case files and, therefore, returned to their FRC in order to complete their transaction.

The County is expecting a report from AT&T that will provide the data for the number of calls rejected due to the lack of system capacity. Many clients did express frustration at attempting to use the ACCESS call center and this has led them to visit the offices to conduct business in person, effectively defeating the potential gains in reduced client visits by establishing the call center.

The ACCESS call center is further hampered by the speed at which it was developed and the lack of call center experience within the management and supervisory staff. Staff has not yet developed an in depth understanding of the automated tracking system.

Currently, the training materials for EWs are still in development as well as a preferred skill set for EWs, standards for phone performance, and goals. ACCESS is also hampered by technical issues that can cause phone messages to change languages during the wait period. ACCESS staff can take limited action on some cases and provide general information, but their ability to accept or process most case actions is limited; therefore, it largely functions as a messaging center for FRC staff. The limited capabilities of ACCESS cause many callers to be redirected to their local FRC, compounding the loss of the 73 EWs sent to work in the call center. The ACCESS center needs to reevaluate the tasks performed in order to relieve workload at the FRCs and better assist clients.

Recommendations

- The ACCESS system is overwhelmed and not responding adequately to client and FRC staff needs. The County could benefit from reevaluating the goals and tasks of the call center to better manage overall client interactions as well as workload distribution. Several states have established effective call centers that we recommend the County visit for further information.
- Develop performance measures for the call center staff.
- Increase capacity, reduce call and wait times, eliminate rejected calls.

Mail Rooms and Drop Boxes

A review of the mailroom procedures at all three offices noted problems with the handling of all incoming mail, consistent with applicant complaints that they cannot use the mail/drop boxes because mailed information is often “lost”. During a client interview, FNS discovered that the client applied through an outreach partner who had mailed the completed application on November 15, 2009. The FRC failed to contact the applicant in a timely manner so she came to the FRC on December 1 with her infant and small child, and waited for 2.5 hours only to be told that the FRC never received her application and to return the next day. The client then returned on December 2 and waited another 1.5 hours before she was told to fill out another application. Following up on the information provided in the client interview, FNS discovered that it is common for paper applications that are mailed to the North Coastal FRC from Outreach Partners to be misfiled or lost. The situation was similar at the North Central FRC whose Manager admitted that the mail room is an ongoing problem due to lack of staff that have been reassigned to document imaging. An interesting contrast was observed at the South FRC where there was a comparatively smaller amount of mail but it was not clear why.

The drop boxes are also problematic at all reviewed offices. The South Office conducts its first collection at 10:30 AM and the last pick up is 3:30 PM resulting in no credit for items dropped off between 3:30 PM and closing time. Envelopes rather than individual items are date stamped. The drop boxes at the North Coastal and North Central offices are on the side of the building and are not apparent to clients.

Recommendations

- To address lost applications from outreach partners, we recommend a FRC point of contact that can monitor applications that have been mailed or faxed from the Outreach Partners to the FRC.
- The procedures for the mailrooms and drop box system should be reviewed to determine the best process to accompany the new document imaging and same day service policies that will minimize document loss and ensure workers have access to all pertinent information as soon as possible.

Community Food Advocacy Groups

The FNS review team conducted meetings with two outside agencies, the Supportive Parents Information Network (SPIN) and the Hunger Coalition of San Diego, to discuss their perspectives on client access to the SNAP program through San Deigo's local offices and change/call center (ACCESS). FNS evaluated the role and effort of both agencies in referring and working with potential SNAP applicants and participants to access benefits. The Hunger Coalition is a California Outreach Partner that stated San Diego County has strengthened the relationship between the Outreach Partners and the FRCs. The Hunger Coalition also noted that communication between the Outreach partners and the FRCs has improved with their ability to contact the ACCESS center via email in order to resolve client complaints. The Coalition remains concerned over the complicated application process. SPIN is an advocacy group which has been critical of all FRCs and the BPR and has provided FNS with information to illustrate core problems with all aspects of the application process.

Fraud Prevention Program

FNS assessed program integrity measures being employed by the San Diego County HHSA by conducting case reviews, client interviews, observing office procedures and interviewed investigative supervisors from the District Attorney Fraud Division. FNS reviewers sought to evaluate the impact of Project 100% (a home visit and fraud investigation on CalWorks cases) on SNAP applicants and the participation rate, especially in determining what methods are used by the FRCs to ensure that SNAP benefit approval in combined cases is not delayed by Project 100%.

After reviewing the case files, we noted that fraud investigations could delay case determinations. One example is where the fraud investigation for CalWorks disclosed exempt resources such as automobiles. Rather than disregarding this information for purposes of the Food Stamp determination, case workers were requesting further verification of the exempt resource. The reviewers also noted that applicants are encouraged to apply for CalWorks which requires a Project 100% referral but when the CalWorks application is dropped there is no action to discontinue the investigation

because the application has been changed to a SNAP only case. Similarly, it was found that all cases involving homeless applicants are referred for a fraud investigation.

Recommendations

- HHS should reevaluate the effectiveness of Project 100% in view of the need to increase participation, improve service to clients and reduce workload.

Required Corrective Action

- Project 100% Fraud investigations must be terminated for combined cases that are converted to SNAP only when there is no reasonable suspicion of fraud.
- FRCs cannot require all homeless applicants to undergo a Welfare Fraud investigation to confirm residency as SNAP Fraud investigations must be based on a reasonable suspicion.

Outreach Partners

The reviewers were pleased to note the improved relationship between the local FRCs and the Outreach Partners. Several improvements have been made to the relationship including the ability of the Outreach Partners to email questions and issues on behalf of their clients to the ACCESS center. This relationship helps to decrease the potential traffic into the FRCs by allowing clients to remotely resolve issues. Another improvement is the willingness of the FRCs to accept applications from the Outreach Partners. Given the small size of its lobby and the building's structural shortcomings, the North Coastal FRC needs to encourage practices that have the dual goal of increasing successful application processing and file maintenance while decreasing client traffic into the office. The North Coastal FRC has developed a 'Flash Report Newsletter' that provides information to the local partners about meetings and program options. While this has been helpful to improved relations, the FRC still needs to better orchestrate communication with the local Outreach Partners regarding mailed applications submitted by the partners to avoid their continued loss in the system.

An excellent example of a successful relationship between an FRC and the Outreach Partners is the Refugee Assistance Program (RAP) at the North Central FRC. The RAP group is in constant communication with the Refugee Outreach Partners; they accept mailed and faxed applications, they conduct phone interviews, they utilize interpretive services including the language line, and they immediately image all documents. More importantly the RAP supervisor and her team seem to be fully vested in the BPR and they are motivated to improve their processes as the tools become available.

Case Reviews

A total of 280 case files were reviewed during the PAR with 70 case files from each of the following categories: approvals, recertifications, terminations, and denials. In total, the three FRCs correctly processed 71% of the approvals, 68% of the Denials, 60% of the

recertifications, and 94% of the terminations. The primary focus of the reviews was on access related issues- timeliness of application processing, expedited service processing and issuance of proper, timely notices.

Timeliness of Application Processing remains a challenge for the three FRCs with 5 expedited cases taking over 7 days and 13 applications not processed within 30 days. Other issues observed were lack of proper withdrawal documentation, unnecessary requests for documentation (copies of the Social Security Card and car registration) and an expedited service case not having benefits issued due to a pending welfare investigation. The case reviewers also noted a problem with language issues including lack of interpreters and notices not provided in the correct language. Denial errors consisted of denials prior to 30 days, unclear notices, denials over 30 days and untimely denial notices.

Some notices were also problematic with issues including: missing notice, no timely notices, notices in the wrong language and contradictory notices sent to the same household. FNS is aware that the problem with incorrect notices is a CalWin systems issue that is being addressed by CDSS in partnership with the CalWin consortium.

The document imaging system also impacted the case reviews by highlighting the problem of lost documents. A major issue was found at the North Coastal FRC where 82% of recertification files sent to central processing for imaging were missing recertification applications or other essential paperwork. These files were then shredded without confirming their imaged status. The North Coastal FRC stated that at the time of the mass imaging process they did not have sufficient staff to fully crosscheck all 17,000 files that had been sent to be imaged offsite.

The following table shows the percentage of sampled case files found correct for each FRC. As stated above, the 18% correct recertifications for North Coastal is due to missing documents.

FRC	Approvals	Denials	Recertification	Termination
North Coastal	70%	68.5%	18%	96%
North Central	75%	56%	96%	85%
South	67%	79%	77%	100%

Miscellaneous Issues

The North Coastal FRC building is unwelcoming and poorly designed to handle its traffic flow. The high volume of people blocks aisles and forces many clients to wait outside where they cannot hear the P.A. system and risk missing their EW appointments. Like all the FRCs, many clients come to the office and wait in line simply to drop off documents because of the unreliable mail and drop-box systems. On a positive note, the office did have staff working the line to prepare clients and or encourage them to use a

drop box or mail. However, this appeared to be an instance where efficiency could be further improved by having an eligibility worker performing that task.

The North Central also has mail room and drop box issues with information getting 'lost' in the office, but there have been major improvements in management of traffic and office flow. The FRC has opted for an open interview room system which is more inviting and an effective use of their space. They have also created enclosed offices that are available for larger groups, especially those with children, and are effective in dealing with animated clients. The FRC has instituted a "Router" position to assign clients to an EW for an interview. In order to better manage the client overflow, a drop-in EW was established to answer short questions and handle simple case changes; 15 minutes per customer. The FRC has been attempting to develop the 'Qmatic' system (computerized office flow system) as a possible answer to improving lobby management system.

The South FRC faces many of the same challenges as North Coastal including a pay phone that does not have signage informing clients that they can use it for free. There are only two house phones in the lobby for all clients to contact ACCESS and their EW, which are insufficient for the very high volume of office traffic. The FRC has implemented the use of a worker to handle quick questions or process simple changes to existing cases.

CONCLUSION

San Diego HHSA is taking steps to increase participation and improve service but the effort has not yet yielded the expected changes. Several issues with the BPR were identified that can be resolved with refinement of the new procedures. We encourage the County to develop standardized procedures based on input from all levels of the organization. To further assist the County, we can offer funding through the State Exchange Program (SEP) for San Diego HHSA staff to seek technical assistance from other states that have successfully implemented a transaction management system similar to the San Diego BPR.

All Management staff should take an active role in implementing and monitoring the new business processes. Management should also involve line staff and other stakeholders when discussing solutions, both while implementing the BPR and as issues arise after the BPR is fully implemented. In order to confirm the successful implementation of the BPR, key elements and performance standards need to be set for all staff.

Part Two
Supplemental Nutrition
Assistance Program
SNAP
Civil Rights Compliance Review

U.S. Department of Agriculture
Food and Nutrition Service
Western Region Office
Office of Civil Rights

CIVIL RIGHTS REVIEW OF THE SAN DIEGO
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM
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ACRONYMS

CR.....	Civil Rights
DSHS.....	Department of Social and Health Services
CSD.....	Community Services Division
FFY.....	Federal Fiscal Year
FNS.....	Food and Nutrition Service
FSP.....	Food Stamp Program
HHSA.....	Health & Human Services Agency
ME.....	Management Evaluation
OCR.....	Office of Civil Rights
SAOR.....	State Agency Operations Review
SNAP.....	Supplemental Nutrition Assistance Program (formerly FSP)
USDA.....	United States Department of Agriculture
WRO.....	Western Region Office

DEFINITIONS

Applicant. A person who applies in writing, electronically, verbally, or through a designated representative for participation in an FNS federally assisted or conducted program.

Beneficiaries. Individuals who receive assistance, services, or benefits under an FNS program (e.g., persons receiving food stamp benefits, WIC benefits, and/or commodities). Some programs commonly refer to these individuals as participants.

Civil Rights (CR). The nonpolitical rights of a citizen; the rights of personal liberty guaranteed to U.S. citizens by the 13th and 14th Amendments to the U.S. Constitution and by acts of Congress.

Civil Rights Act and Regulations. Title VI of the Civil Rights Act of 1964 and other authorities as outlined in Section II above and in the program-specific appendices.

Complainant. A person or group of persons who allege discrimination in the delivery of program benefits or services by a State agency, local agency, or other sub recipient.

Corrective Action Plan. A plan describing the actions to be taken to resolve noncompliance with civil rights regulations, instructions, policies, and guidelines.

Discrimination. The act of distinguishing one person or group of persons from others, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected bases.

Federal Financial Assistance. Federal financial assistance includes, but is not limited to: Any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance; Grants and loans of Federal funds, Grant or donation of Federal property and interests in property; Commodities; Detail of Federal personnel; Sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property or the furnishing of services without consideration or at a nominal consideration, that is reduced for the purpose of assisting the State agency, local agency, or other sub recipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the State agency, local agency, or other sub recipient.

Federally Assisted Activities and Programs. Includes any program, project, or activity for the provision of services, financial aid, or other benefits to individuals (whether provided through a State agency, local agency, or other sub recipient receiving Federal financial assistance or provided by others through contracts or other arrangements with the State agency, local agency or other sub recipient), and including work opportunities, cash, loans, or other assistance to individuals. For the

purposes of this definition, services, financial aid, or other benefits provided to individuals are those provided with the aid of Federal financial assistance or with the aid of any non-Federal funds, property, or other resources required to be expended or made available for the program to meet matching requirements or other conditions that must be met in order to receive the Federal financial assistance, and to include any services, financial aid, or other benefits to individuals provided in or through a facility with the aid of Federal financial assistance or such non-Federal resources.

Finding: Identification of non-compliance with program regulations, policies, and procedures. A corrective action is required.

FNS Regional OCR – The organizational unit reporting to the Office of the Regional Administrator that has delegated CR authority at the regional level.

Grassroots Organization. An organization at the local level that interacts directly with potential eligible's or participants, such as an advocacy organization, community action program, civic organization, migrant group, religious organization, neighborhood council, or other similar group.

Investigation. Formal gathering of facts by the appropriate Office of Civil Rights (OCR) or other authorized government agency or private contractor that will refute or substantiate an allegation of discrimination.

Limited English Proficiency (LEP) Persons. Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Recipients of Federal financial assistance have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by person(s) with limited English proficiency.

Local Agency or Other Sub recipient. Any agency, organization, or corporation that receives Federal financial assistance either directly or indirectly from FNS. Examples of local agencies include, but are not limited to, school food authorities, food banks, and county health departments. .

Noncompliance. The finding that any civil rights requirement, as interpreted by regulations; this Instruction; policies; or State agency, local agency, or other sub recipient guidelines; has not been satisfied.

Participants. Individuals who receive assistance, services, or benefits under an FNS program (e.g., persons receiving food stamp benefits, WIC benefits, and/or commodities).

Potentially Eligible Persons. Individuals or households that may be eligible to receive FNS program assistance, benefits, or services, but have not applied.

Program Applicant. Any agency or organization that submits a request or plan as required for FNS or a State agency, as a condition of eligibility for Federal financial assistance.

Program Access: Project designed to decrease barriers to the Food Stamp Program and increase participation among those who are eligible.

Program Compliance Review. An evaluation procedure used to determine if State agencies, local agencies, and other sub recipients are administering and operating FNS programs in accordance with program and civil rights regulations, instructions, policies, and guidance.

Project Area. The county or similar political subdivision designated by a State as the administrative unit for program operations. Upon prior FNS approval a State, city, Indian Reservation, welfare district, or any entity with clearly defined geographic boundaries, or any combination of such entities, may be designated as a project area in accordance with regulations or guidelines for the specific program being administered.

Recommendations: Statement of actions that address observations made in the review. These actions may or may not be required.

Required Corrective Action: Statement of actions that must be taken to correct non-compliance with regulations, and with established policies and procedures. These actions may be prescribed or the State may be required to determine the actions to be taken.

Service Delivery Area. The locale serviced by a service delivery point in the administration of FNS assisted programs, such as a school district or a food stamp project area.

Service Delivery Point. A place in which FNS assisted program services or benefits are administered to the public. Examples of service delivery points are homes for elderly citizens, day care centers, clinic sites, and FSP certification centers.

State Agency or other Recipient. Any State Department (e.g., Health, Social Services, Education, Agriculture) or entity (e.g., Indian Tribal Organization (ITO)) that receives Federal financial assistance directly or indirectly from FNS, and either extends those funds to another State agency, local agency, or other sub recipient for the purpose of carrying out a program, or expends those funds directly in carrying out a program.

Refer to FNS Program appendices for additional clarification on State agencies.

Sub recipient. Any agency, organization, or corporation that receives Federal financial assistance indirectly from FNS. Examples of sub recipients include but are not limited to school food authorities, food banks, and county health departments.

Underserved Group or Community. A group or community whose participation in an FNS program is significantly below the percentage of potentially eligible members of the group or community in the service area.

USDA OCR - The organizational unit reporting to the Office of the Secretary of Agriculture that has authority to develop and administer a comprehensive program to assure equal opportunity and nondiscrimination for all persons in all aspects of USDA programs under applicable CR laws and regulations.

Part Two: Civil Rights Review Outcomes

The WRO's Civil Rights Review focused on the following areas; Civil Rights (CR) Training, Services for Limited English Proficient (LEP) clients, Services and Accessibility for Persons with Disabilities, Public Notification/ Complaint Procedures and Collection of Racial and Ethnic Data.

I. CIVIL RIGHTS TRAINING (FNS 113-1, Section IX)

Civil Rights training for all employees is required so employees and supervisors understand their civil rights obligations and requirements. Persons responsible for ensuring overall CR compliance at the county must receive training to assist them in performing their responsibilities.

Generally, local agencies are responsible for training their "frontline staff." Frontline staff interacts with program applicants or participants, and those persons who supervise "frontline staff," must also be provided civil rights training.

Training subject matter must include, but is not limited to: Collection and Use of racial and ethnic data, effective public notification, complaint procedures, resolution of noncompliance, requirements for reasonable accommodation and access for persons with disabilities, and ensuring for language assistance for persons with limited English proficiency.

FINDINGS

FNS reviewed San Diego County's efforts in providing civil rights training to its staff in the following areas:

1. FNS found that the civil rights training provided to local staff has been inconsistent and not conducted on a regular basis. Some employees don't recall ever receiving CR training. A regular schedule must be established for all new and continuing employees.
2. FNS found that employees that did receive training had difficulty recalling the content or topics covered during the training. As such, the content and effectiveness of the training needs to be examined so that staff receives a fuller and competent understanding of their CR obligations to clients.

REQUIRED CORRECTIVE ACTIONS

San Diego County must provide a regular schedule for CR training as well as have content that provides a complete understanding of civil rights pursuant to FNS Instruction 1-113. As a first step, San Diego County needs to meet with the WRO CR Director to develop a plan to accomplish these goals during FY 2010. The initial meeting or conference call should be arranged by April 30, 2010.

II. SERVICES FOR LIMITED ENGLISH PROFICIENT (LEP) CLIENTS

7 CFR Part 272.4 (b)

Agencies that fail to provide services to Limited English Proficiency (LEP) clients or applicants or deny them access to federally assisted programs and activities may be discriminating on the basis of national origin in violation of Title VI of the Civil Rights Act of 1964 and its implementing, regulations.

Title VI and its regulations require State and County agencies to take reasonable steps to assure “meaningful” access to the information and services they provide regarding the SNAP. What constitutes reasonable steps to assure meaningful access is determined by a number of factors listed in FNS Instruction 113-1 and the Food Stamp regulations.

FINDINGS:

The County of San Diego serves a substantial population of limited English proficient (LEP) clients, including Spanish-speakers. With the employment of bilingual staff and a telephone call center with access to a language line, the County has the ability to serve the needs of many in the LEP populations. However, there were specific problems uncovered during this review. They include:

1. SNAP written materials are not provided in languages other than English or Spanish.
2. There is a consistent delay of up to 2 weeks in obtaining a translator for clients who speak languages other than English and Spanish.
3. The County’s SNAP website is in English only. No information is provided in any other language.
4. Reception staff has problems identifying a person’s language other than English or Spanish.
5. Clients with limited English proficiency are unable to reach the ACCESS Center staff by telephone because of delays.
6. Information on the use of the drop boxes need to be put in languages other than English
7. Signage on how to use the lobby telephones to contact the ACCESS Center is in English only.

REQUIRED CORRECTIVE ACTIONS

1. SNAP written materials need to be made readily available in languages other than English or Spanish in all offices and lobbies immediately.
2. The delay in obtaining a translator for languages other than English and Spanish must be eliminated immediately. The use of a telephone language line service similar to what is available at the ACCESS call center would be a possible solution.
3. The website must have information on SNAP in languages other than English. Link(s) to SNAP information in other languages would meet this requirement. This corrective action needs to be accomplished in the next 60 days.
4. Reception staff needs a tool to identify the non-English speaking client's language. A language identification tool (such as the "I Speak Card") should be made immediately available for staff at all offices.
5. The ACCESS Call Center must improve its ability to handle calls sooner to avoid an adverse impact on clients with limited English proficiency. This is addressed in the Program Access portion of the report.
6. The instruction for the use of all the drop boxes must be in made available in English and Spanish immediately.
7. Signage on the use of the lobby telephones to contact the ACCESS Center and office staff must be in Spanish and English immediately.

BEST PRACTICES

1. The County of San Diego is to be commended for its language certification process which ensures that employee's second language proficiency can be used to serve LEP clients.
2. The Refugee Assistance Program located at the Kearny Mesa Office has a model language assistance program as well as maintains direct contact with community partners.
3. The County of San Diego is to be commended for its regular use of telephone interpretation services at the ACCESS call center

III SERVICES AND ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The Americans with Disabilities Act (28 CFR Part 35, Title II, Subtitle A), prohibits discrimination on the basis of disability in all services, programs, and activities provided to the public by State and local governments. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability as well as the USDA Implementing Regulation, 7 CFR Part 15 b.

In addition, FNS 113-1 Instruction states that the public is to be provided “appropriate information, including Web-based information, in alternative formats for persons with disabilities.” (FNS 113-1, IX, (B) (3))

FINDINGS ON PHYSICAL ACCESS:

1. Parking access issues. There is no signage at the Oceanside office to let disabled clients know that there are disability parking spaces available for their use at the other nearby parking lots.
2. Interior and Exterior drop boxes are not accessible for persons in wheel chairs. (all offices)
3. Walkway to the Chula Vista office has two access problems. There is a recessed light in the concrete sidewalk which blocks wheelchairs use. On the opposite side, there is a walkway with a fire sprinkler shut off valve in the middle of the accessible walkway.
4. Vegetation growing over handrails on access ramp is an access problem (Oceanside).
5. Some racks and information cases on the lobby walls are too high for access by persons with a disability. (all offices)
6. No space in the lobby is reserved for persons with wheel chairs. (all offices)
7. No chairs in the lobby are posted as reserved for persons with disabilities. (all offices)
8. Some And Justice for All posters in the lobby are not in a prominent location nor viewable by persons in wheel chairs.
9. The orientation rooms do not have an And Justice for All poster. (all offices)

10. The portable no smoking sign is blocking an accessible pathway into the Oceanside building.
11. The front doors at the Chula Vista office are not accessible as push-pull pressure is excessive. At the Chula Vista Office the guard stated that they are not allowed by contract to assist persons into the building. Thus, it is particularly important that the front doors be adjusted to ADA standards.
12. The Chula Vista office has two disability accessible reception windows. However, one is used for finger imaging and the other is used for EBT. They are not available for use by persons with disabilities transacting other business.
13. SNAP materials are not readily available in large print, Braille or audio.
14. Public and employee restrooms in the offices and call center reviewed do not appear to meet all of ADA accessibility guidelines. The problems identified so far include:
 - a. Doors do not close and do not meet the push pull requirements. (all sites except the Kearny Mesa public restrooms.
 - b. Large concrete trash containers and chairs in some restrooms block access (Chula Vista)
 - c. Soap dispensers not accessible to persons in wheelchairs. (Oceanside, Chula Vista)
 - d. Disability Stall door is installed backward. A person in wheelchair would have no privacy. (Oceanside-employee 2nd floor)
 - e. Not all restrooms at the call center are accessible. Those that are not accessible do not have a sign indicating where the accessible restrooms are located.

REQUIRED CORRECTIVE ACTIONS

1. Place exterior signage at the Oceanside Office to inform disabled clients there is disability parking spaces available for their use at the other nearby parking lots.

2. The Interior and exterior drop boxes are to be placed at a height and location so that they are accessible to a person in a wheel chair. (all offices)
3. The recessed light in the Chula Vista concrete sidewalk needs to be repaired so it does not block the walkway for wheel chair access or impede access to persons with other disabilities. On the opposite side, an accessible path must be created around the fire sprinkler shut off valve.
4. Vegetation growing over handrails on Oceanside office access ramp need to be removed so it does not impede use of the handrail and ramp.
5. Racks and information cases on the lobby walls are to be lowered for access by persons with a disability. (all offices)
6. Space in all lobbies must have a space reserved for persons with wheel chairs. (all offices)
7. At least three Lobby chairs are to be posted as reserved for persons with disabilities. (all offices)
8. And Justice for All posters in all lobbies are to be placed in a prominent location and viewable by persons in wheel chairs.
9. The orientation rooms must have an And Justice for All poster. (all offices)
10. The portable no smoking sign at the Oceanside office must be placed so it does not block the accessible pathway to the front doors of the Oceanside building.
11. The front doors at the Chula Vista office must be adjusted to ADA push-pull standards.
12. One of the Chula Vista office's two disability accessible reception windows must be made available for use for persons in wheel chairs and not used exclusively for EBT or photo imaging functions.
13. SNAP materials must be made readily available in large print, Braille or audio. And staff must be informed of where such materials are located.
14. Restroom doors must close and meet the ADA push pull standards. (all sites except the Kearny Mesa public restrooms).

15. The large concrete trash containers and chairs in some restrooms must be removed or placed where they do not block wheel chair access. (Chula Vista)
16. Each public and employee restroom must have an accessible soap dispenser for use by persons in a wheel chair. (Oceanside, Chula Vista)
17. The disability stall door that is installed backward must be repaired so a person in wheelchair has privacy. (Oceanside-employee 2nd floor)
18. All restrooms at the call center that are not accessible must have signage posted stating where the accessible bathrooms are located in the building

In view of the large number of corrective actions on physical access, the county will need to confer with the WRO CR Office to develop a plan and timetable within 60 days of the date of this report to address these deficiencies.

IV. PUBLIC NOTIFICATION

All Food Stamp programs must include a public notification system. The purpose of this system is to inform applicants, participants, and potentially eligible persons of the program availability, program rights and responsibilities, the policy of nondiscrimination, and the procedure for filing a discrimination complaint.

Each state agency must take specific action to inform applicants, participants, and potentially eligible persons of their program rights, and responsibilities and the steps necessary for participation.

Applicants and participants must be advised at the service delivery point of their right to file a complaint, how to file a complaint and the complaint procedures. In addition, all information materials and sources, including, web sites, used by State agencies to inform the public about Food Stamps must contain a nondiscrimination statement.

In addition, FNS 113-1 Section IX, B, 2, requires that local agencies must inform potentially eligible persons, community leaders and grassroots organizations about the Food Stamp Program. This includes information about eligibility, benefits, services, location of local offices and hours of service. This information can be communicated by such methods such as, but not limited to, Internet, newspaper articles, radio and television announcements, letters, leaflets, brochures, computer-based applications, and bulletins. FNS 113-1, IX, (A) (2) and (4), Appendix A, (G) (I) and (2).

FINDINGS

1. The *Civil Rights Information* form 0-44 HHS (6/99) Eng/SP lists USDA as a source to file a complaint but it does not have the contact information for USDA. This form is attached to the food stamp application.
2. The ACCESS Call Center does not record or maintain information on discrimination complaints.
3. And Justice for All (ADJ) posters are not in a prominent location in the office lobbies nor viewable by persons in a wheelchair.
4. The orientation rooms do not have the ADJ poster.

REQUIRED CORRECTIVE ACTIONS

1. Insert the USDA contact information on the *Civil Rights Information* form 0-44 HHS (6/99) Eng/SP. This needs to be completed within 30 days of the date of this report.
2. The Access Center must record and maintain information on discrimination complaints and forward them to the County Civil Rights Coordinator. This requirement must be accomplished immediately.
3. And Justice for All (ADJ) posters must be immediately placed in prominent and accessible locations in all the lobbies.
4. All orientation rooms must have the ADJ poster posted in a prominent and accessible location. This requirement must be accomplished immediately.

V. COLLECTION OF ETHNIC AND RACIAL DATA AND PROGRAM PARTICIPATION

Local agencies must provide for and maintain a system to collect the racial and ethnic data in accordance with FNS policy. This data will be used to determine how effectively FNS programs are reaching potential eligible persons and beneficiaries, identify areas where additional outreach is needed, assist in the selection of locations for compliance reviews, and complete reports as required. (FNS 113, Section XII)

In addition, agencies are responsible for analyzing current racial or ethnic data to determine if the Food Stamp Program is reaching potentially eligible, low-income households throughout its service areas. (FNS 113, appendix A, (I).

Unexplained discrepancies in participation data that indicate a service area is not in compliance with civil rights requirements must be reviewed or investigated further. Trend analysis must be conducted to determine if significant changes in racial and ethnic participation data warrant further review or investigation.
(FNS 113, Appendix A (I))

FINDINGS

1. County staff utilizes incorrect procedure whenever clients do not report their race or ethnicity on the application. Staff states that client's race or ethnicity is marked as unknown or left blank.

REQUIRED CORRECTIVE ACTIONS

1. Whenever client chooses not to fill in their race or ethnicity, staff is required to utilize visual observation to fill in the information. It's advisable that staff inform client of this procedure to encourage them to self-identify their race or ethnicity.

NOTE: Most of the corrective actions are to be remedied immediately or within a reasonable timeframe. In its response to FNS corrective actions, the county should propose a reasonable time frame to correct deficiencies whenever there is no stated deadline. FNS will review the county's proposed timeframes and consult with the county to arrive at a mutually agreeable deadline if necessary.