

**SUPPORTIVE PARENTS INFORMATION NETWORK (SPIN) & CARING COUNCIL RESPONSE
TO THE CHIEF ADMINISTRATIVE OFFICER'S PLAN TO ADDRESS SOCIAL SERVICE
ADVISORY BOARD WORK GROUP RECOMMENDATIONS**

MARCH 2011

SPIN and the Caring Council would like to acknowledge the enormity of the task assigned to the Chief Administrative Officer's (CAO) staff by the Board of Supervisors. To take 69 recommendations of varying levels of specificity with no particular set of priorities and return a plan of action within ninety days is a large undertaking. Given the size and complexity of the task it is of no surprise that the plan presented is very general, providing only broad brush strokes. As presented, we see it as a good start. However, much is yet to be done to address the significant problems with the County's safety net. Taken as a framework for action, this plan is helpful in directing where resources should go and pointing to ways to evaluate the efforts to improve services.

Our request to the Social Service Advisory Board is:

1. That you continue your role as monitor of progress on these recommendations by holding HHSa accountable, i.e., requiring regular evaluation of its progress on issues such as accuracy, timeliness, client service, etc.
2. This process continue to be a transparent one where the data and the evaluations are accessible to the public in such a manner as to allow for independent assessments and evaluation.
3. That you continue to serve as a platform where clients and constituents can raise issues, questions, and concerns with the expectation that they will be respectfully received and addressed.

Attached to this document is a detailed review of the plan with requests for information, suggestions for further action, questions about future actions, etc. The attachment is organized according to the categories presented in the plan, i.e., in place, in progress, feasibility, and requiring further study.

General Response

- In Place: The report identifies 21 recommendations as being "in place." While designed to improve the quality of service, little is said as to how these efforts will be evaluated. We are calling for an evaluation of the effectiveness of these efforts through the use of specific, measurable indicators and that the data collected are accessible to the public. The specific data and/or information being requested are listed in the following section.
- In Progress: The report identifies 23 recommendations as "in progress." As stated above, while these actions are designed to improve the quality of service, little is said as to how these efforts will be evaluated. Specific means for evaluating these efforts need to be put in place to insure they are achieving their intended objective.

For both these categories the report states what has been done and what is being done, but, with the exception of the ACCESS line, makes no statement as to how HHSa will know if what they are

doing is successful. We believe it is the responsibility of the SSAB to require HHSA to provide data that allow for judging the efficacy of HHSA's efforts.

- Feasibility: The report identifies eleven recommendations that are feasible or partially feasible. Again, the level of feasibility is stated without details as to how, when or if, HHSA plans to act on these recommendations [except Recommendation 29]. Additionally, there are no statements as to how HHSA will know if any of these actions, if implemented, are successful.
- Further study: The report identifies twelve recommendations as "requiring further study." As with the concerns raised about recommendations labeled as feasible, the report merely states that the recommendation requires further study. No statements are made as to how, when, and who will be involved in the "further study." To be meaningful, a timeline and process for action must be created and shared with the public.

Specific Data Requests

The following data is requested. It is also requested that the data be reported on a regular basis and be accessible to the public. These data serve as indicators of HHSA's progress on the specific issue and/or recommendation. A review of the attached detailed response identifies why this data are being requested and how it will be used to evaluate the success of HHSA's actions. The particular data requested are:

- Number of cases in pending over 30 days each month
- ACCESS data:
 - Percent of callers who reach a worker
 - Length of time it takes to reach a worker
 - Percent of callers who hang-up before reaching someone
 - Percent of callers who get referred to their FRC and why
- Suggested indicators for assessing improvement of services (program guides) are:
 - How many "QA-Negative Reviews" are conducted each month?
 - Of the reviews, how many are judged to be "Correct" and how many are judged "Incorrect?"
 - How many cases are noted as "Response Required QA?"
 - How many cases are noted "QA Negative Review Completed" each month?
 - How many cases result in corrective action and how many challenge QA?
 - How many cases result in benefits being awarded and/or restored?

If successful, these actions should result in a reduction in percent of cases judged to be "Incorrect" and percent of cases requiring corrective action. [Recommendations 24-27]

- What issues arise for designated liaisons? How are they resolved? Are any reports issued? If yes, when and how obtained?
- A copy of the 90/90 plan
- Copies of state & federal audits and their outcomes
- How many people taking advantage of the new technology for getting information and applying [Recommendation 66]
- How are the Complaint Lines at both the FRCs and the ACCESS Line being used, how often, for what reasons, how resolved, etc

A Special Note on the Use of “Bridges Out of Poverty”

While we recognize HHSA’s attempt to address issues that relate to their staff’s understanding of poverty and the people who live in poverty, we are appalled at their decision to use the work of Ruby Payne [Bridges Out of Poverty]. Her work has been widely discredited for not having any basis in data or research and for reinforcing negative stereotypes of people living in poverty. A close examination of her work will show the following:

- The claim that she is the “leading U.S. Expert on the Mindset of Poverty, Middle Class, and Wealth” is only made by her publisher and Ms Payne is self-published.
- She has claimed that her “Framework for Understanding Poverty” is based on thirty years of longitudinal data when it is actually based on her experience being married to a man who supposedly grew up in poverty.
- Her work is rooted in the idea of a “culture of poverty.” More than forty years of research on this concept since it emerged in the 1960s has found no evidence to support that a “culture of poverty” exists. In fact, research consistently shows the opposite. People living in poverty generally share the same set of values and the same level of knowledge about issues such as nutrition, health, education, etc. as the general population.
- Her work focuses attention on a group she identifies as “Generationally Poor,” i.e., poor for two generations or longer. Analysis of people living in poverty shows that about 2% or less of population fits this description. In addition to focusing her entire program on approximately 2% of the population, there is no research to support the idea that this group has the defining characteristics she claims in her writings.

We strongly urge HHSA to abandon the use of this program and replace it with evidence-based training. SPIN and the Caring Council offer their services in assisting HHSA in finding a suitable replacement.

ANALYSIS OF SSAB SNAP WORK GROUP RECOMMENDATIONS: IN PLACE

No	Recommendation	CAO Response	Caring Council/SPIN Request
10	Develop description of what is a pending case	One in which an application has been filed on behalf of a household and a determination of eligibility has not been made	What percent of such cases are over 30 days? This data should be reported to the SSAB monthly and be accessible to the public.
16	Assess ACCESS call Center using the following: 1. Percent of callers who reach a worker 2. Length of time it takes to get through to a worker 3. Percent of callers who “hang-up” before they reach a worker 4. Percent of callers who are referred to an FRC and the reasons	Blank	This data be reported monthly to the SSAB and accessible to the public.
20	Implement a phone reporting system to capture # of abandoned calls, # of hang-ups and how long a call waits.		
22	Supervisors or the most experienced Food Stamp workers should immediately begin review of all Food Stamp pending applications and cases older than 20 days	See CalFresh Program Material Continuous Improvement Project	If this effort is successful it should reduce the number of cases in “Pending” and the number of “Pending” cases that are over 30 days. Number of cases in “Pending” over 30 days should be reported monthly to the SSAB and be accessible to the public
24	Different operational guides need to be created depending on how the application is received. A. Same day application and intake B. Same day application, but not same day intake C. One E-applications D. Mail/Fax applications	Addressed through face-to-face waiver – Recommendation 21	How is this effort being evaluated? Suggested indicators are: <ul style="list-style-type: none">• How many “QA-Negative Reviews” are conducted each month?<ul style="list-style-type: none">○ Of the reviews, how many are judged to be “Correct” and how many are judged “Incorrect?”○ How many cases are noted as “Response Required QA?”• How many cases are noted “QA Negative Review Completed” each month?<ul style="list-style-type: none">○ How many cases result in corrective action and how many challenge QA?○ How many cases result in benefits being awarded and/or restored?
25			
26			
27			
39	Improve language access	Language Line is currently available at all FRCs, ACCESS and 211, Recommendation 11 (in progress)	How is this being evaluated?
43	Partner with CBOs to conduct out-of-office outreach	Members of NSTF work to coordinate outreach efforts	How are outreach efforts being evaluated?

47	Create and maintain internal advocate(s) whose responsibility is to resolve problems in cases as they arise.	Each FRC has designated liaisons whose responsibility is to resolve issues as they arise.	What issues arise at each FRC? How are they resolved? Produce monthly/quarterly reports that are accessible to the public
49	All case files are to be updated daily	Cases records are required to be updated as information is received and process in accordance with the 90/90 plan.	Obtain a copy of the 90/90 plan
51	Workforce performance goals and incentives reflect the goal of increasing participation in HHS programs.	HHS Excellence Goals include improving timely processing of apps – incentives are available for outstanding individual and group performance.	How are “outstanding” performers identified? Where do the number of “Pending” cases fit in?
53	Institute a set of consequences to the worker/agency for errors that result in the delay, false denial, false termination, or incorrect reduction in food stamps award, etc.	State & Federal audit procedure include consequences for County not meeting standards.	Copies of audits
54	Institute regular trainings focused on issues related to poverty, e.g., its causes, types of poverty, challenges facing families in poverty, role of government programs in addressing poverty, etc.	The “Bridges out of Poverty” trainings was piloted and is being rolled out to Managers and Supervisors.	While “Bridges out of Poverty” is widely used, it has been heavily criticized for not being research-based and for reinforcing false, negative stereotypes of people in poverty. It is only Ruby Payne’s publisher that claims her to be a “Leading Expert” in poverty. She is self-published!
56	Develop a mechanism for regular dialogue between clients and members of the Social Services Advisory Board to ensure the Board hears the client perspective directly.	Brown act does not allow for interactive dialogue outside of public meetings, public comment allowed at SSAB	Appreciate the role of SSAB as providing a venue for raising issues.
59	A process should be implemented as soon as possible so that once a client has provided all requested information and has a receipt issued by the County of San Diego, the client’s file is placed in expedited status, overseen by a supervisor, to insure that a timely resolution is forthcoming, with a minimum of additional requirements of the client.	Case files are required to be updated as info is received and processed in accordance with 90/90 plan.	Obtain copy of the 90/90 plan
60	Pursue legislative remedy for the current requirement that a FS recipient changing residence from one California county to another must reapply for FS in the new county.	The legislation (AB 1612) was signed into law by CA Gov on October 8, 2010,	In this policy being implemented?
62	Revise the ACCESS telephone agent scheduling process so that all auxiliary time activities - - other than breaks and lunch - - occur when the agents are not assigned to telephone duty.	See CAO Analysis	See recommendations 16 and 20
66	Arrange mobile enrollment and case service for clients residing in remote areas, without convenient public transportation, or who for other reasons are unable to get to an FRC.	Increasing technology	How many clients/potential clients are accessing these services? How is this effort being evaluated?
67	Institute measures to ensure - - without exception - - that all FS applications are resolved within 30 days, not including delays due appeal scheduling.	90/90 plan	How many “Pending” cases are over 30 days each month?

ANALYSIS OF SSAB SNAP WORK GROUP RECOMMENDATIONS: IN PROGRESS

No	Recommendation	CAO Response (summary)	Caring Council/SPIN
1	Institute a Total Quality Management solution throughout the agency: 1. Acquire measurable, relevant, comparable data; 2. Identify system strengths and limitations; 3. Identify training opportunities; 4. Assure quality of services, including the availability of accurate, up-to-date local information; 5. Improve delivery and standardization of services; 6. Improve overall performance. 7. Process and Product Standards	Office of Eligibility Improvement enhancing computer system to capture results of quality assurance reviews.	When will this system be functional? What data will be captured? What information will be available to the public?
2	Develop quality as a culture in all levels of delivery system	FRCs continue to reinforce quality in all services – Office of Eligibility Improvement and Training Steering	How is effort being evaluated?
3	Create a Vision, Mission and Customer Service Statement by Reinforcing through training and staff buy in.	New training	How is effort being evaluated?
4	Implement skills based trainings	On going trainings are held to strengthen skill sets	How is effort being evaluated?
5	Ensure integrity of data (Metrics; Measurement; Gathering; Accuracy) and Add out-of-office phone based support by adding QR7 and recertification process	Metrics are currently reported as required by state & fed	What metrics are reported?
7	Implement procedure for County staff to deal with loss of documents	Agency implementing multi-faceted approach for document control	How is effort being evaluated?
8	Embrace culture change at the County to get benefits to those that are eligible	Nutrition Security Task Force and “Bridges out of Poverty” training	While “Bridges out of Poverty” is widely used, it has been heavily criticized for not being research-based and for reinforcing false, negative stereotypes of people in poverty. It is only Ruby Payne’s publisher that claims her to be a “Leading Expert” in poverty. She is self-published!
9	Use partners as a form of quality control	Continue Monthly meetings	Ensure the voice of the consumer is included directly (not through advocates)
11	Create current desk aid	Review availability of content of existing desks aids	When was review conducted? What were the findings of the review? What actions taken as result of the review?
12	Keep County staff engaged	See recommendations 1-4, 8, 44, 51-54	How is effort being evaluated?

21	Our analysis indicates that a county worker has absolutely no one place to go to get accurate information on how to properly administer the Food Stamp Program and this condition must be rectified before the adding/subtracting/moving of resources.	See CalFresh Program Material Continuous Improvement Project	How is this effort being evaluated? Suggested indicators are: <ul style="list-style-type: none"> • How many “QA-Negative Reviews” are conducted each month? <ul style="list-style-type: none"> ○ Of the reviews, how many are judged to be “Correct” and how many are judged “Incorrect?” ○ How many cases are noted as “Response Required QA?” • How many cases are noted “QA Negative Review Completed” each month? <ul style="list-style-type: none"> ○ How many cases result in corrective action and how many challenge QA? ○ How many cases result in benefits being awarded and/or restored? <p>If successful, these actions should result in a reduction in percent of cases judged to be “Incorrect” and percent of cases requiring corrective action. [recommendations 24-27]</p>
28	Complete revamping of the Food Stamp Student Guide to comply with Federal, State and County rules.	Creating an online Eligibility University	When implanted? See above for evaluation
31	Hold training for County Employees	See recommendation 4	How will effort be evaluated?
35	Improve training, monitoring & accountability	See recommendation 1	How will effort be evaluated?
36	Improve capacity for and culture of accountability and customer service	See recommendations 1,2,3	How will effort be evaluated?
38	Create an accessible complaint process	Complaint process advertised in multiple languages at all FRCs. Access line has process	Access line in inaccessible – not viable complaint process – How often is complaint process used at FRCs? What kinds of complaints are received? How are they resolved and how quickly?
40	Address high rate of lost documents	See recommendation 7	How will effort be evaluated?
41	Address over-verifications	See recommendation 11	When was review conducted? What were the findings of the review? What actions taken as result of the review?
42	Address high negative error rates	See recommendation 1	When will this system be functional? What data will be captured? What information will be available to the public?
44	Ensure efficient use of limited HHS resources	County continues adjust its processes to leverage its resources within the current economic climate	How will effort be evaluated?
48	Develop and maintain a means for reviewing Notices of Action being sent out daily in order to identify and prevent the mailing of multiple and/or conflicting Notices of Action.	State/Fed require mailing of NOAs – Staff will continue to review for unnecessary NOAs. Client questions answered at FRCs and Access line.	How many NOAs reviewed, how many deemed unnecessary?” FRCs and Access not accessible without hours of client time – not viable response at this time

50	All clients are to be notified in a timely manner if there is any change in their case and/or status.	See recommendation 48	FRCs and Access not accessible without hours of client time – not a viable response at this time
52	Develop/maintain means of insuring workers are up to date with rules and regulations as published in FS Regs ACLs, Special Notices, Program Guide, etc.	Program staff & Training Committee coordinate efforts	See recommendation 21

ANALYSIS OF SSAB SNAP WORK GROUP RECOMMENDATIONS: FEASIBILITY (Including Partially and not Feasible)			
No	Recommendation	CAO Response	Caring Council/SPIN
6	Make FRCs more inviting, includes copier, coffee and play area	See recommendation 58	What is timeline for instituting changes? Children space – El Cajon has children’s furniture – can expand on this.
13	Assess timeliness of processing applications using the four indicators: 1. Percent of cases pending at the end of month 2. Percent of cases resolved over 30 days 3. Percent of cases resolved within 30 days 4. Percent of expedited cases pending at end of quarter	Partially feasible	Data available from CA DSS Need to know number of “Pending” cases over 30 days
19	Review the benchmarks quarterly and re-convene the Workgroup if any or all of the benchmarks are not met.	Partially feasible. HHSA submits reports to SSAB	Need to set benchmarks on metrics to indicate success.
23	Proper and complete Case Notes must be required.	See recommendation 46 – County will review standards	What are the standards? When reviewed? Findings from review? Actions taken? How evaluated?
29	Review of all County created Food Stamp Program forms to make sure that they are updated and obsolete forms are removed.	To be completed in 3 months (June/July 2011)	How will findings be reported?
30	LASSD offers to be part of a technical workgroup that does a revamping of all benefit program materials used by County workers	Will develop a process to solicit input on materials	When and who will be invited?
32	Build friendlier website	Website change in planning stages	When will it be completed?
55	Create a “complaint” process that allows clients to file complaints that go directly to the Social Services Advisory Board – not through HHSA.	Not feasible	SSAB presently serving function well
63	Use public service announcements on radio, TV, and buses, to advertise the FS program and where to get information about how to apply.	FNS conducts marketing efforts. County staff will leverage these opportunities to design local campaign	When? Who will be involved? How will it be evaluated?
64	Establish and advertise a single point where clients can register complaints.	Partially feasible. See recommendation 38 – Clients have several points to register complaints	Access line in inaccessible – not viable complaint process – How often is complaint process used at FRCs? What kinds of complaints are received? How are they resolved and how quickly?

65	Post SNAP process performance data on-line, for ready access by the public.	Performance currently posted – will create link from County Website	Additional information is needed that is not reported to State, e.g.: <ul style="list-style-type: none"> • Pending over 30 days • Number of negative actions • Outcome of negative outcome reviews • Number, types and outcomes of appeals • Etc.
69	Implement an urgent comprehensive overhaul - - with participation by the Legal Aid Society of San Diego - - of all program training and guidance materials, to ensure they are current, clear, and consistent.	See recommendation 30	When and who will be invited?

ANALYSIS OF SSAB SNAP WORK GROUP RECOMMENDATIONS: REQUIRES FURTHER STUDY

No	Recommendation	CAO Response	Caring Council/SPIN
14	Assess the accuracy of case determinations using: 1. The monthly negative error rate 2. The percent of cases to appeal 3. Length of time from appeal to decision 4. Outcomes of appeals (e.g., Out-of-hearing resolutions, overturning of decisions, etc.)	Items 2, 3, 4 require further study to determine relevance and availability of data	When will study begin and who will participate
15	Assess the quality of service at Family Resource Centers. In particular, develop and maintain the means for assessing the following: 1. Length of time waiting at FRCs 2. Number of trips required to FRC 3. Conditions of facilities [see SPIN recommendations	Items 1, 2 require further study for availability of data and means of collecting data	When will study begin and who will participate
17	Set goals for the measures identified above	See recommendation 61	When will consultant be hired? How will measures be decided?
18	Set benchmarks for assessing movement toward the goals for each measure	See recommendation 61	When will consultant be hired? How will measures be decided?
33	Develop application tracker	Can be tracked electronically by client and CBO. Agency researching Customer Relations Management Tools	When will study be completed and how can be results be accessed?
34	Open phone line on Access	See recommendation 61	When will consultant be hired? How will measures be decided?
37	Make ACCESS accessible	See recommendation 61	When will consultant be hired? How will measures be decided?
45	Develop and maintain a case monitoring system that includes a record of the chain of possession of documents and records so that every document can be traced.	Implementation of an independent bar-coding system for all documents now being researched.	When will research be completed? How can results be accessed?

57	Develop and maintain a monitoring system that captures actions that prevent individuals from applying [e.g., verbal denials, raising immigration status issues, asking irrelevant personal questions, etc.]. [e.g. recording and/or video taping interaction, secret shopper, etc.]	Further study regarding legality, feasibility costs and resources is needed	When will study begin? How can results be accessed?
58	Upgrade all Family Resource Centers so that they include things such as space and material for children, free copiers, access to telephones, access to food and water, uplifting environment [color of walls, signs, etc.], eliminate search and scans, remove bulletproof glass between client and worker	List: Water, food, copiers, etc.	When will study on: vending machines, elimination of scans, searches and bulletproof glass begin? How can results be accessed?
61	Assign the number of additional ACCESS agents necessary to reduce the average telephone answering delay time to approximately 10 seconds. The number of additional agents should be determined analytically, not by cut-and-try methods.	Assign the number of additional ACCESS agents necessary to reduce the average telephone answering delay time to approximately 10 seconds. The number of additional agents should be determined analytically, not by cut-and-try methods.	When will consultant be hired and what will measures be? How will results of consultants work be accessed by public?
68	Institute measures to ensure that every document presented by an applicant is immediately scanned into the, and a receipt certifying that it has been scanned is provided to the applicant. And if, for any reason, a document cannot be immediately scanned into the system, issue a receipt to the applicant and maintain a continuous written chain of custody of the document so that its whereabouts can be determined at any time.	See recommendation 30	When and who will be invited?