

The State Hub Roadmap: CDSS CalFresh and CalWORKs Streamlining Verifications

Stakeholder Engagement Report

November 2018

social interest.
SOLUTIONS

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1 Introduction

This report summarizes input from key stakeholders about the current environment of eligibility verifications for CalFresh and California Work Opportunity and Responsibility to Kids (CalWORKs) in California and potential solutions. Stakeholder input informed the *As Is & Gap Analysis* and the *Alternatives Analysis* for the State Hub Roadmap project. Please see those documents for additional details.

1.1 CURRENT CHALLENGES

Stakeholders provided significant insights about current challenges faced by clients and program staff. Key themes included the following:

- **Lack of timely electronic data:** Electronic data matches can be a valuable verification method, but only if the data arrives at the time it is needed and is sufficiently up-to-date. These criteria are often not met, particularly for verification of earned income. As a result, clients are routinely asked for paper documentation.
- **Burdensome manual processes:** County workers are required to perform repetitive manual processes that could be avoided or minimized with better automation.
- **Burdensome paper document processes:** The lack of timely electronic data places a significant burden on clients to produce and staff to collect and process paper documents. These burdens often result in delays, denials, or churn.
- **Complexity and variability:** The systems, policies, and business processes for eligibility verification are complex and vary across programs and counties. This complexity and variability may unintentionally result in delays in the verification process, duplication of effort across counties, and often frustration for both county workers and clients who are trying to navigate the verification processes with imperfect data or information.

1.2 POTENTIAL SOLUTIONS

There was no single solution or option that stakeholders identified as the key

recommendation to streamline the CalFresh and CalWORKs verification processes. Stakeholders offered a variety of technical options, but also included suggestions relating to policy, training, and governance. Stakeholder suggestions included the following:

- Promote data timeliness;
- Increase access to other data sources;
- Automate rules and business processes;
- Facilitate document submission; and
- Align verification requirements and policies across programs.

For additional information about potential solutions for addressing existing challenges with the current environment for eligibility verification for CalWORKs and CalFresh, see the *Alternatives Analysis* for the State Hub Roadmap project.

2 Background

The California Department of Social Services (CDSS) is exploring electronic solutions to streamline and modernize the processes for obtaining required verifications for CalFresh and CalWORKs eligibility. The goal is to make the verification process fast, accurate, and efficient for both clients and program staff. Social Interest Solutions (SIS) assisted CDSS by analyzing the current environment of eligibility verifications for CalFresh and CalWORKs, performing an alternatives analysis of electronic verification systems being used in California and other states, and outlining recommendations for moving forward in the short, medium, and long term. A key component of SIS' analysis included understanding and incorporating input from a broad range of stakeholders. This report describes the project's stakeholder strategy and summarizes key insights.

3 Stakeholder Engagement Strategy

3.1 PURPOSE

The stakeholder engagement strategy was designed to achieve two primary purposes under this project:

1. To identify areas of convergence and divergence among the stakeholders regarding their principles and priorities for streamlining verification processes for CDSS clients in California; and
2. To gather information, insights, and ideas about California's existing and planned verification policies, processes, and systems.

A secondary purpose of the stakeholder engagement strategy was to promote a shared understanding among stakeholders and foster support for moving forward. However, the stakeholder engagement strategy for this project was not intended or designed to build consensus among stakeholders for any specific findings or recommendations.

3.2 IDENTIFICATION OF STAKEHOLDERS

Stakeholders were identified based on ongoing assessment of the information needed for the goals of the project and the individuals or groups likely to have the subject-matter expertise, experience, or other input to meet those needs.

During the initial planning phase of the project, SIS and CDSS jointly identified four broad categories of stakeholders to engage and developed a list of specific individuals and groups within each category. The initial list was updated and revised as needed during the project, with guidance from CDSS and input from other stakeholders. The broad categories of stakeholders included:

- **State Policy:** CDSS CalFresh and CalWORKs policy and program experts, as well as Medi-Cal experts from the Department of Health Care Services (DHCS).
- **State Technology:** Representatives from state agencies with responsibility for current and future verification systems, including the Office of Systems Integration (OSI), the Agency Information Office (AIO), DHCS, and the CDSS Automation,

Integrity and Client Initiatives Branch (AICI) and Information Systems Division (ISD).

- **County:** Representatives from county agencies and those that support county agencies and operations, including the County Welfare Directors Association of California (CWDA) and the Statewide Automated Welfare Systems (SAWS) Consortia. CWDA helped to identify representatives from a geographically diverse array of individual counties who could provide insights about areas of convergence and divergence in technology and business processes around the state. **Please note:** *It was beyond the scope of this project to document specific technologies and business processes in each of California's 58 counties.*
- **Consumer- and Community-Based Organizations:** Representatives from organizations that provide direct services to CalFresh and CalWORKs clients and/or advocate on their behalf. This category includes food policy, food bank, welfare rights, civil rights, immigrant rights, and legal aid organizations. Western Center on Law and Poverty (WCLP) helped to identify individuals and organizations who could provide insights on the consumer experience of the CalFresh and CalWORKs verification processes.

Specific stakeholders within these broad categories were further identified as part of the planning for the interview, focus group, and working session stakeholder engagement activities described below. In total, more than 100 individuals participated in these activities. For a complete list of these individuals, please see *Appendix A: Stakeholder Register*.

3.3 STAKEHOLDER ENGAGEMENT ACTIVITIES

The following stakeholder engagement activities were conducted from February through November 2018.

3.3.1 Public Webinars

An introductory project [kick-off webinar](#) was held on February 21, 2018. More than 100 stakeholders participated in the webinar, including representatives of state and county agencies, state legislators, and consumer advocates. The webinar presentation included: an overview of the project's scope, goals, deliverables, and

timelines; background about the verification process for CalFresh and CalWORKs; and an introduction to the stakeholder engagement plan.

On June 5, 2018, CDSS and SIS held a [mid-project webinar](#). Following on the success of the first, the second webinar included a summary of project activities completed to date, preliminary findings, and emerging alternatives from the stakeholder engagement process. Turnout was similar to the first webinar with over 100 stakeholders in attendance.

A final webinar was held on November 15, 2018 to present the Roadmap, with more than 140 stakeholders in attendance.

3.3.2 Project Website and Email

From the project's outset, CDSS hosted a project website.¹ The website provides background information about the project, including a fact sheet and frequently asked questions. Webinar presentations and project updates were regularly posted to the site. CDSS also created a project email address (statehub@dss.ca.gov) where stakeholders could submit questions, materials, and comments for the project.

3.3.3 Interviews

Individual and small-group interviews were conducted using a tailored guide for each conversation. In total, 27 individuals were interviewed. See *Appendix A* for the full list of interviewees.

Each interview session was conducted by phone and lasted approximately one hour. Interviewees were provided background information about the project in advance and at the beginning of the interview. Interviewees were also informed that no specific comments made by them would be attributed to them in the Roadmap without permission. Some interviews were recorded with the interviewee's permission solely for the purpose of facilitating research notes. Summaries of key interviews were provided to CDSS.

Interview topics typically included, but were not limited to, interviewees' insights on the following:

- Current verification policies, systems, and processes;
- Current challenges or barriers to streamlining verifications for applicants and beneficiaries;
- Opportunities and options for streamlining; and
- Factors to consider when weighing options.

3.3.4 Focus Groups

Three focus groups were conducted. Attendance was by invitation only in order to facilitate an open discussion with opportunities for all participants to contribute.

- **Consumer advocates:** A total of 25 consumer advocates from 17 food policy, food bank, welfare rights, civil rights, immigrant rights, privacy policy, and legal aid organizations were invited to participate in a focus group held on April 18, 2018. Nine individuals attended the focus group. This focus group provided perspectives on the consumer experience of the verification processes throughout the state. For the first half, participants were asked to reflect on current verification challenges at different parts of the application process. They were specifically asked to discuss any unique challenges faced by certain populations, such as students, seniors, foster youth, limited English speakers, and immigrants. Participants were asked in the second half of the focus group to share their suggestions for potential solutions, recommendations, and opportunities for streamlining. All invitees were subsequently asked to provide additional feedback via the project email address.
- **County staff:** The other two focus groups included county health and human services staff overseeing the CalFresh and CalWORKs programs in their county. The counties invited were selected to ensure representation from different SAWS consortia, counties with a range of population sizes, and both rural and urban counties. On May 10, 2018, a southern California focus group with 22 participants representing San Bernardino, Ventura, Riverside,

San Diego, Orange, and Los Angeles counties was held. On May 24, 2018, a northern California focus group with 17 participants representing Marin, Merced, Sacramento, Santa Clara, Siskiyou, Stanislaus, and Yolo counties was held. These focus groups provided an opportunity to compare and contrast verification processes, challenges, and options across counties. Participants were asked about their systems and business processes, challenges with verifying specific eligibility factors and using specific data sources, and their suggestions for potential solutions, recommendations, and opportunities for streamlining.

3.3.5 Working Sessions

Two working sessions were conducted. Attendance was by invitation only in order to facilitate an open discussion and the opportunity for all participants to contribute.

- **IT Working Session:** A three-hour, in-person meeting with 28 participants was held on April 27, 2018 to discuss the current technical environment that supports verification requirements for CalFresh and CalWORKs eligibility, including current challenges and gaps, and explore options to modernize and integrate electronic verifications into the eligibility determination process. The main objectives of the working session were to:
 - Provide an opportunity for stakeholders with technical expertise to further refine the analysis of how the current systems across agencies obtain and share data for purposes of eligibility verification, and to help identify gaps and challenges;
 - Identify opportunities to leverage existing or planned IT initiatives, systems, and infrastructure (e.g., SAWS migration); and
 - Identify key technical and non-technical requirements that must be kept in mind when considering alternatives.

To facilitate discussion, SIS provided preliminary diagrams of the current verification and eligibility systems at initial certification, mid-period, and recertification for input and feedback. Participants were also asked to discuss

specific data sources, interfaces, and verification systems, such as the Applicant and Recipient Income and Eligibility Verification Systems (IEVS).

- **Final Working Session:** A three-hour, in-person meeting with 38 participants was held on August 1, 2018 to present identified alternatives based on work to date, to gather stakeholder input, and to analyze the current environment for CalFresh and CalWORKs verifications. The main objectives of the working session were to:
 - Gather participants who represent the array of stakeholders SIS engaged throughout the project, including consumer advocate, county, consortia, and state perspectives with policy, operations, and technology expertise;
 - Provide transparency and promote a shared understanding of gaps in the current environment; and
 - Discuss alternatives and solicit input from stakeholders to help ensure that the final Roadmap reflects the expertise and diversity of stakeholder perspectives that are critical to success.

To facilitate discussion, SIS presented identified alternatives for input and feedback. Participants were also asked to weigh trade-offs and assess options to streamline and modernize the processes for obtaining required verifications for CalFresh and CalWORKs eligibility.

3.3.6 Site Visits

Project team members from SIS and CDSS participated in site visits to Sacramento County on April 20, 2018, and to Los Angeles County on May 9, 2018. Each one-day site visit included tours, interviews, and observations at a local eligibility office that provides in-person services and at a customer service center that provides services by phone. The site visits provided opportunities to observe county workers conducting eligibility verifications in order to gain a better understanding of their existing systems and business processes. Interviews with clerical staff, county workers, supervisors and managers, and county IT staff provided additional opportunities to explore current verification gaps and challenges.

3.3.7 CalACES Demonstration

Project team members from SIS and CDSS participated in a demo of the future California Automated Consortium Eligibility System (CalACES) platform, based on the existing LEADER Replacement System (LRS), in Norwalk, California on July 10, 2018. The demo provided an opportunity to observe and ask detailed questions about the current and future changes to system features, such as the following:

- Application registration;
- Electronic Document Management System that stores electronic images of notices, letters, and documents (e.g., pay stubs) provided by clients to verify information;
- Business Rules Engine for eligibility determination for CalFresh, CalWORKs, and Medi-Cal; and
- Real-time dashboards, such as the reception log and performance measures.

The demo also provided an opportunity to better understand the system architecture planned for the future consolidated SAWS system and its capability to interface with other existing or new systems and/or data sources.

4 Summary of Stakeholder Insights

The stakeholder engagement activities yielded valuable details and insights about the current policy, operational, and technical environment for obtaining required verifications for CalFresh and CalWORKs eligibility. In addition, stakeholders provided significant insights about current challenges faced by clients and program staff. Stakeholders also suggested potential solutions to address these challenges.

Key challenges in the current environment for eligibility verification and potential solutions from stakeholder input are summarized below.

4.1 CURRENT CHALLENGES

The current policy, operational, and technical environment for obtaining required verifications for CalFresh and CalWORKs is complex. Accordingly, the associated challenges are complex. Key findings are summarized below. For additional details about the underlying policy, operational, and technical environment, please refer to the *As Is & Gap Analysis*.

4.1.1 Lack of Timely Electronic Data

Electronic data matches can be a valuable verification method, but only if the data arrives at the time it is needed and is current enough to be useful. These criteria are often not met, particularly for verification of earned income. As a result, clients are routinely asked for paper documentation. Examples include the following:

- A primary source of electronic data for many eligibility factors, including earned income, is the Applicant Income and Eligibility Verification System (Applicant IEVS). It takes a minimum of 24 hours and often 5 to 7 days, sometimes longer, for Applicant IEVS results to be delivered to the county worker, which means it is not useful for same-day service. While a client may receive expedited benefits based on self-attestation, ongoing benefits are often pended until the client submits paper documentation (e.g., copies of pay stubs).
- Timely earned income data is particularly challenging. For example, state

wage data is available to electronically verify income, but employers report the data on a quarterly basis, so the electronic data the county worker has access to is generally at least three months old. However, federal SNAP rules for eligibility determinations at initial certification require consideration of the household's circumstances for the entire month of application.⁷ The wage data available may also not clearly indicate start and end dates for employment, making it challenging to verify whether the person still has the job that generated the wage data. More recent earned income data may be available in real time through other electronic sources, such as the Equifax/TALX Work Number service, but not all employers use this service, especially small- and medium-size firms. In addition, not all county workers currently have access to the service. As a result of earned income data challenges, clients who report earned income are routinely asked to provide paper documentation of the income.

- Some electronic data sources provide very old data. For example, annual asset matches from federal and state tax agencies are based on tax filings that are one to two years old. Old data may create the appearance of inconsistencies, which county workers then have to resolve. Often, this results in the county worker asking the client to prove a negative – e.g., that they no longer have a job, resource, or other factor indicated in the old data.

4.1.2 Burdensome Manual Processes

County workers are required to perform repetitive manual processes that could be avoided or minimized with better automation. Examples include the following:

- County workers access multiple systems to support the verification process. Often, these systems require the county worker to separately and repeatedly log into each one and manually enter the same or similar case information. For example, one county identified 23 different systems that are currently used by county eligibility staff for CalFresh, CalWORKs, Medi-Cal, and other county programs.
- Although the data is viewable on computer monitors, there is no automatic import functionality between current systems like the Medi-Cal Eligibility Data

System (MEDS) and SAWS, leaving county workers no other way to input data received from other sources, such as MEDS, into SAWS, the system to determine eligibility, than to manually type the information from one screen to another. Depending on the SAWS system, county workers may be able to copy and paste information from the external source or take a screenshot and attach it to the case record. Manual entry can increase the likelihood of error, such as transposed numbers.

- County workers manually review documents and determine whether they are sufficient based on the worker's own understanding of program rules and manual calculations, such as income calculations. Sometimes county workers have access to state or county operations manuals, or other charts and tools that help with these efforts.

4.1.3 Burdensome Paper Documentation Processes

The lack of timely electronic data places a significant burden on clients to produce and staff to collect and process paper documents. These burdens often result in delays, discontinuances, or churn.

Stakeholders shared differing opinions about the continued need for paper documentation from individuals and households. Some stakeholders were in support of moving toward a truly paperless process where all eligibility criteria could be electronically verified, while other stakeholders identified the continued need for paper documentation for some or all eligibility factors given the lack of quality, timely data for certain eligibility criteria from existing data sources.

4.1.3.1 Paper Documentation Challenges for Clients

- Clients may be confused and overwhelmed by document requests, particularly if they have language and/or literacy limitations.
- Clients may submit documents that are not sufficient for the county worker, such as a pay stub for the wrong pay period or a document that the worker does not find as acceptable evidence. As a result, clients may be asked for additional documents.

- Clients may be asked repeatedly for the same or similar documents. For example, a client may be asked to provide a birth certificate or immigration document that the client previously provided because the county worker may not be able to easily find it in the SAWS system given how documents are currently organized, or if the documents are in another county's document management system.
- Clients may be asked to submit documents for information that does not affect eligibility. For example, bank statements may be requested for CalFresh even though most households are not subject to a resource limit.

4.1.3.2 Paper Documentation Challenges for County Staff

- Some clients prefer to submit documents in person rather than via mail or electronic means. For example, they may prefer to get a receipt or they may expect to get benefits faster by hand-delivering the documents. Clients may also lack access to online tools or mobile apps to submit documents electronically. As a result, document submission is a significant cause of lobby traffic and waiting times.
- Due to the current systems and business processes, documents submitted in person may take as long or longer to get to the county worker than documents submitted through other means, such as one of the three online consumer portals or kiosks.
- Document images may be of poor quality. For example, clients may submit low-quality photos of documents or improperly scan a document so that the image is cut off. Document image quality may deteriorate between the time it is uploaded and the time it becomes viewable to the county worker due to image-compression issues.
- Due to various system limitations with existing document-management systems in different counties, documents may be improperly indexed or labeled, resulting in improper routing and processing. Some of these challenges stem from the consumer portal user interface. For

example, current portals do not have an easy way for clients to ensure the uploaded documents are complete or legible and do not provide a simple way to properly identify different documents. For example, clients can label uploaded documents only under 10 categories in one county.² As a result, clients will upload documents that do not fall into one of these categories, creating delays for the county in identifying and properly indexing the document so that it can be used to verify the proper eligibility factor.

- Regardless of how documents are submitted, they must be manually validated (i.e., determined to be legible and relevant) and processed (i.e., used to support an eligibility determination – or determined insufficient, thus requiring additional documentation) by county clerical or eligibility staff or both.
- An inability to access permanent documents that are already in the SAWS system creates duplication for both county workers and the clients. Case information and documentation from one SAWS system cannot easily be accessed by a county worker in another SAWS system or even the same SAWS system in a different county. Rather than being able to re-use documents that clients had provided the previous county, county workers in the new county ask clients to re-submit the same information so that the new case has the proper documentation. Although the Inter-County Transfer (ICT) policy and process require the original county to send all the case information to the new county, counties reported that the transferred file did not contain all the required verifications or the document image was not sufficiently legible.³

4.1.4 Complexity and Variability

Stakeholders from diverse perspectives consistently expressed frustration with existing data, processes, policies and barriers that created confusion for clients and uncertainty for county workers, but the specific causes of those frustrations varied greatly. These inconsistencies likely stem from the fact that policies, business processes, and technologies involved in eligibility verification vary

between CalFresh and CalWORKs, across counties, and among staff within a county. As a result, the verification experience and results can be highly variable for clients and county workers despite statewide policies and procedures.

4.1.4.1 Differences in Implementation of Eligibility Verification Policy

CalFresh and CalWORKs verification rules provide flexibility for clients and county workers. For example, verification of certain information is required, but the specific type of verification is not.⁴ Verification methods include electronic data matches, paper documentation, collateral contacts, and client statements.⁵ In addition, documentation of certain eligibility criteria – such as shelter costs – is only required if the information reported by the client is considered “questionable” by the county worker. This flexibility and discretion exercised by county workers can either help clients meet the verification requirements based on their individual circumstances, or create processing delays or barriers to access.

- Despite the flexibility and discretion, county workers may be less willing to accept documentation that is not commonly seen even though there are no rules prohibiting acceptance of specific types of documents. County workers are entrusted to make judgment calls about the validity of important documents and, because of the fear of making a mistake, may err on limiting what they would allow as acceptable verification. For example, stakeholders reported that some county workers refused to accept a foreign birth certificate to verify date of birth because the document was written in another language.
- Although eligibility rules permit county workers to use collateral contacts or self-attestation when documentary evidence is not available, stakeholders reported that these verification methods are considered insufficient, or only to be used as a very last resort rather than the next tier of acceptable verification after documentary evidence. For example, clients with untraditional jobs or a living situation where common documentary evidence is not available are often asked to provide specific documentation and are subsequently denied for failure to submit

the specific evidence. As a result, clients may be asked to make a good faith effort to obtain documentary evidence that may not exist, and only after they fail are they given an opportunity to provide verification through other acceptable methods.

- Not only do county workers have significant discretion to determine what evidence is sufficient for verification, they also have discretion to determine what information reported by the client may be “questionable,” which requires further investigation and verification as well as delays in processing. When county workers find information to be “questionable,” they may require clients to provide additional information to resolve the perceived discrepancy. Failure to comply may result in delays, denials, or reductions/discontinuances of benefits.

4.1.4.2 Variation Among Counties

CalFresh and CalWORKs are county-administered programs. Counties have significant operational latitude, which results in variations in how the verification process is handled across counties. For example:

- Some counties provide opportunities in the county’s office lobby for clients to scan their paper documents and obtain a receipt, which can help reduce wait times. However, other counties have county workers scan documents that clients bring to the office, which may result in better document image quality and indexing accuracy.
- Counties may adopt county-specific verification approaches, such as county-specific forms to document client statements, and county workers may be more or less willing to accept less common paper documents, such as an out-of-state certificate of home birth. Clients who are unaware of or do not have ready access to the county-specific forms, or who lack other birth records, may experience delays or denials in one county, but face different document requirements in another program or county based on that worker’s understanding of the rules.
- The need for documentation from clients may also vary among county

workers within the same county depending on an individual county worker's experience, training, and understanding of the policy rules.

4.1.4.3 Different Verification and Reporting Requirements Across Programs

Stakeholders reported that the lack of standardization on verification policy for CalFresh and CalWORKs causes duplication of efforts (including data requests), additional processing time, and confusion for the clients. Without alignment of both policies and procedures among the programs, clients must often provide the same information to each program at different times or in different formats. Examples include the following:

- Though CalFresh and CalWORKs generally have similar verification requirements, CalWORKs has additional eligibility criteria that require verification, such as resources, school attendance, and immunizations. As a result, CalWORKs clients may experience more verification challenges than CalFresh-only clients.
- A client receiving both CalFresh and CalWORKs (and potentially other benefits, such as Medi-Cal) may also have different reporting requirements. For example, clients may be subject to different Income Reporting Thresholds (IRTs) for each program, and find it challenging as to when and what needs to be reported (and verified).⁶
- CalFresh and CalWORKs moved to simplified reporting requirements for clients in 2013, changing from quarterly reporting to semi-annual reporting. However, county workers receive periodic data matches from third-party sources at times unrelated to the client's certification period and with information that the client is not required to report, such as wage matches that are run for the entire caseload once per quarter. County workers spend time processing these matches only to determine that no action is required. Sometimes county workers require clients to provide documentation to resolve an apparent, but ultimately irrelevant, inconsistency that was reported from an electronic data source.

4.1.4.4 Different Standards for Eligibility Versus Performance Monitoring and Improvement Activities

Stakeholders provided examples of county workers spending unnecessary time on verification activities and clients being asked to provide unnecessary or repetitive verification information.

- County workers may not distinguish between the different documentation requirements under CalFresh eligibility rules and under federally required quality control (QC) reviews. While eligibility workers have flexibility on what is acceptable verification, QC reviewers do not, which can sometimes lead eligibility workers to over-verify to avoid an error.
- Clients are sometimes asked to prove a negative – e.g., that they no longer have a job, resource, or other factor – because the county worker has access to information about the client from the past, in some cases years earlier, and must resolve the apparent discrepancy. For example, a county worker may have access to earnings information that indicates that a client had a job, and while the information does not show recent earnings (e.g., because the data is old or because it shows zero earnings in the most recent pay period) there is no clear indication that the job has ended, as stated by the client on her application. If self-attestation is not considered sufficient, the application is pended until the client obtains proof from the former employer, who may have fired, harassed, or harmed the client. Rather than contact the employer out of fear or embarrassment, the client may fail to respond to the request for verification and be denied benefits.
- Existing policy requires clients to provide documents and other information for verification purposes, but also requires county workers to assist the client in obtaining the required verification if the client is cooperating.⁸ Stakeholders generally noted more of an emphasis on the client's responsibility, as opposed to the county worker's, under this policy with differences in interpretation of this policy across counties.

4.1.4.5 Greater Barriers for Specified Populations

Stakeholders also provided examples of unique barriers to verification faced by certain populations, potentially impeding access to benefits, such as:

- Clients whose primary language is not English may also have limited literacy in their primary language. They may be particularly confused or overwhelmed by official document requests from the county, such as the “Request for Verification” ([Form CW 2200](#)), which is written in small print and is three pages long. In addition, they also are more likely to have difficulty using self-service tools, such as the consumer portals, scanners, and mobile apps, which may only be available in English and Spanish, with limited information available in other languages.
- Homeless clients may experience particular challenges complying with document requests because their documents have been lost, stolen, or seized. Accommodations are available in these situations, but clients may not be offered or aware of these options.
- Non-citizen clients may be required to provide documents of a particular type even when alternative documentation should be acceptable. For example, clients may be asked for copies of foreign birth certificates when other sources could be used to confirm date of birth. Clients may also be asked to produce previously submitted immigration documents at recertification/redetermination, even though their immigration status has not changed and there is an existing trusted electronic data source for the majority of non-citizens.⁹ There are also particular challenges with access for certain non-citizens, such as U visa holders, who may be incorrectly told they are ineligible because they do not have a specific immigration document.
- CalFresh eligibility rules for students are complicated and have recently changed. When in doubt, county workers may err on the side of over-documentation of student status and student exemptions. One stakeholder shared that county workers may request additional verification for a student application, which places that application back

in the task queue for another worker, just to avoid processing the more complicated case.

4.2 POTENTIAL SOLUTIONS

There was no single solution or option that stakeholders identified as the key recommendation to streamline the CalFresh and CalWORKs verification processes. Rather, stakeholders offered many suggestions that focused largely on technical options, but also included suggestions relating to policy, training, and governance.

The potential solutions offered by stakeholders that resonated the most with them are summarized below. They helped inform the numerous options detailed in the *Alternatives Analysis* to address the gaps identified in the *As Is & Gap Analysis*.

4.2.1 Technical Solutions

4.2.1.1 Promote Data Timeliness

Stakeholders offered suggestions aimed at getting the right information to county workers at the right time to reduce the need for paper documentation. Examples include the following:

- Increase the availability of data in real time, rather than batch.
- Explore opportunities to leverage the Federal Data Services Hub (FDSH) for CalFresh and CalWORKs. Stakeholders appreciated the availability of real-time data through the FDSH (via the California Healthcare Eligibility, Enrollment, and Retention System [CalHEERS]), as well as the auto-processing of that data to facilitate real-time eligibility determinations. However, stakeholders also noted that the level of detail provided through the FDSH/CalHEERS may not be sufficient for use by CalFresh and CalWORKs. For example, stakeholders questioned whether it yields sufficient income detail for purposes of calculating benefit amounts.
- Increase access to and use of the Equifax/TALX Work Number service for both intake and ongoing cases. While Work Number has its limitations, it does provide more current income data for some clients.

Some counties are currently using it at intake to promote same-day/one-touch service.

- Deliver Applicant IEVS results faster. Stakeholders indicated a desire for Applicant IEVS requests to be processed more reliably, with less need for county workers to make repeated manual requests. Stakeholders also questioned why results, in whole and in part, are often accessible much more quickly in MEDS than in SAWS.

4.2.1.2 Automate Rules and Business Processes

Stakeholders offered suggestions for reducing manual processing and promoting timeliness and accuracy through automation. Examples include the following:

- Automate verification workflow management. For example, based on the current data, the system could generate a customized checklist of the verifications still needed and examples of what could satisfy the requirements for those specific criteria.
- Automate filtering of data to display only the most recent and relevant available verification results based on a programmed hierarchy.
- Auto-adjudicate verification results and eligibility determinations when possible, such as when no changes on a case are indicated or client statements are compatible with electronic data sources.
- Explore Single Sign On (SSO) features to reduce or eliminate the need to log into multiple systems.
- Explore ways to better integrate the external data sources with SAWS in order to reduce or eliminate the need for manual data entry of verification data in the case record.

4.2.1.3 Facilitate Document Submission

Stakeholders suggested many ways to make it easier for clients to submit documents electronically. Examples include the following:

- Provide more self-service scanning capabilities in local offices, or use

kiosks at schools, libraries, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) offices (which primarily serve low-income infants, children, and pregnant women).

- Improve the SAWS consumer portal user interface. For example, to reduce improper indexing and routing, stakeholders suggested either adding more categories of documents or eliminating all categories (i.e., effectively create a single folder into which all of the client's documents could be uploaded). Stakeholders also suggested using the same technology that banks use to scan checks: if the image is not clear, clients are asked to re-scan or re-take the picture.
- Promote greater use of electronic notices, alerts, and other communication tools to help clients know what documents they need to provide and when.
- Add optical character recognition (OCR) and intelligent document recognition (IDR) tools into the eligibility processes. For example, these tools could facilitate document validation, indexing, and routing, and automate reading and processing of key data elements within a document.
- Create a central document repository that is easily searchable and complies with existing confidentiality protections. During recertification/redetermination, this would allow the re-use of permanent verifications that clients had submitted with their initial application so that clients would only be required to submit verification for those eligibility criteria that have changed.

4.2.2 Non-technical Solutions

4.2.2.1 Policy

Stakeholders consistently noted that much of the complexity and duplication in the current verification processes stem from different policies and requirements for CalFresh and CalWORKs, as well as Medi-Cal. Different

definitions of household, income, and allowable expenses are not easily understood by clients or county workers. Stakeholders' suggestions for policy alignment or standardization include:

- Re-use of certain data across programs, especially for permanent verifications for continuing cases;
- Creating a single, statewide policy manual that could be updated by the state and used by county workers in all counties;
- Address differences between eligibility standards and performance monitoring and improvement standards to help eligibility workers avoid performing more verification activities during an eligibility assessment than is required for purposes of eligibility verification;
- Updating CalFresh and CalWORKs regulations and re-organizing All County Letters by subject matter rather than year (similar to Medi-Cal guidance provided by DHCS); and
- Promoting one-touch application processing, on-demand interviews, and simplifying the current application and forms. For example, [GetCalFresh.org](https://www.getcalfresh.org) uses plain language in its application tool, which has helped many find the application process less intimidating.

4.2.2.2 Training

Stakeholders noted that some of the challenges clients experience may be the result of insufficient training or tools for county workers, especially for populations where the rules may be unique, such as homeless individuals or students. Suggestions from stakeholders included:

- Standardized training materials and “cheat sheets” created by CDSS when there is a change in policy;
- Creating tools to help county workers and clients determine which student exemption applies to them; and
- Training on the reasonable accommodations that should be provided to clients who are homeless, disabled, or have limited English proficiency.

Stakeholders also recognized the need for basic technology training. For example, in addition to user-friendly training for clients on how to upload documents from the online portal or mobile app, such as YouTube videos or visual charts, training county staff on those same tools will allow them to better assist their clients and help them overcome potential barriers.

4.2.2.3 Governance

Stakeholders addressed the need for formalized governance structures among state agencies with overlapping verification responsibilities, between state and county agencies, and among counties in order to promote collaboration and alignment. For example, agencies that “own” different systems and data sources should work across agencies to promote appropriate data-sharing while reducing duplicate data and streamlining processing of the data.

4.2.2.4 Client-Centered Vision

Stakeholders identified examples where streamlining or simplifying verification would require greater emphasis on the state’s vision of a client-centered environment for eligibility verifications. For example, many counties use expedited processing standards to help clients complete their application the same day, but only a few counties clearly stated that their goal was same-day, one-touch processing for everyone, not just those with immediate need. Stakeholders also pointed to Idaho as an example of where a change in culture led to shorter application-processing times, fewer cases that needed to be “pending” for follow-up, and higher customer satisfaction because county workers used every available tool to complete verification of eligibility and interview on the same day. Although the size and complexity of California may be seen as a barrier to changing the culture, stakeholders encouraged CDSS to use its existing authority – as well as flexibility, such as taking advantage of available state options – to ensure a consistent focus and emphasis on streamlining the verification process to help ensure eligible clients are able to access critically needed benefits at the time they need them.

5 Conclusion

The stakeholder engagement strategy successfully met its goals. Stakeholder insights heavily informed the *As Is & Gap Analysis* and the *Alternatives Analysis*. Ongoing stakeholder engagement beyond this project will be valuable as verification solutions move forward.

6 Appendix A: Stakeholder Register

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
Bay Area Legal Aid (BALA)	Cynthia	Chagolla	Focus Group	4/18
Alliance to Transform CalFresh	Jennifer	Tracy	Working Session	8/1
California State Assembly Budget Committee	Nicole	Vazquez	Working Session	8/1
California Association of Food Banks (CAFB)	Stephanie	Nishio	Focus Group	4/18
California Automated Consortium Eligibility System (CalACES)	Joel	Acevedo	Working Session	4/27; 8/1
California Automated Consortium Eligibility System (CalACES)	John	Boule	Interview	4/26
California Automated Consortium Eligibility System (CalACES)	Anna	Chia	Working Session	4/27; 8/1
California Automated Consortium Eligibility System (CalACES)	Michele	Peterson	Working Session	4/27
California Automated Consortium Eligibility System (CalACES)	Sharon	Teramura	Working Session	4/27
California Department of Health Care Services (DHCS)	Jodee	Barton	Working Session	4/27
California Department of Health Care Services (DHCS)	Miguel	Bodied	Working Session	4/27
California Department of Health Care Services (DHCS)	Ken	Buehler	Interview; Working Session	4/27; 7/4
California Department of Health Care Services (DHCS)	David	Bullard	Working Session	4/27
California Department of Health Care Services (DHCS)	Anne	Gezi	Working Session	8/1

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
California Department of Health Care Services (DHCS)	Wendy	Louis	Working Session	4/27
California Department of Health Care Services (DHCS)	James	Petrick	Working Session	4/27; 8/1
California Department of Health Care Services (DHCS)	John	Roussel	Working Session	4/27
California Department of Health Care Services (DHCS)	Craig	Stone	Interview; Working Session	4/27; 7/2; 8/1
California Department of Health Care Services (DHCS)	Manuel	Urbina	Working Session	4/27; 8/1
California Department of Health Care Services (DHCS)	William	Wall	Working Session	8/1
California Department of Health Care Services (DHCS)	Sandra	Williams	Interview; Working Session	4/3; 4/27; 8/1
California Department of Health Care Services (DHCS)	Amy	Winter	Working Session	4/27
California Department of Health Care Services (DHCS)	Emily	Yamamoto	Working Session	4/27
California Department of Social Services (CDSS)	Chris	Alivio	Interview	4/27
California Department of Social Services (CDSS)	Analyn	Deloso	Working Session	4/27; 8/1
California Department of Social Services (CDSS)	Shawn	Dorris	Working Session	8/1
California Department of Social Services (CDSS)	Kevin	Ehmka	Working Session	4/27
California Department of Social Services (CDSS)	Abhinash	Rathore	Working Session	4/27
California Department of Social Services (CDSS)	Jansson	Stout	Interview	7/3
California Department of Social Services (CDSS)	Francisco	Verduzco	Interview	4/27

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
California Department of Social Services (CDSS)	Brian	Wong	Interview	5/1
California Food Policy Advocates (CFPA)	Jared	Call	Working Session	8/1
California Food Policy Advocates (CFPA)	Elyse	Homel Vitale	Focus Group	4/18
California Health and Human Services Agency (CHHS)	Adam	Dondro	Interview; Working Session	3/20; 4/10; 8/1
California Health and Human Services Agency (CHHS)	Lupe	Grimaldi	Working Session	8/1
California Health and Human Services Agency (CHHS)	Sheryl	McCarthy	Interview; Working Session	3/20;4/10; 4/27; 8/1
California Health and Human Services Agency (CHHS)	Don	Michie	Interview	3/20; 4/10; 4/27
California Health and Human Services Agency (CHHS)	Colin	Stevens	Interview; Working Session	3/20; 4/10; 4/27; 8/1
California Rural Legal Assistance, Inc. (CRLA)	Monica	Sousa	Focus Group	4/18
California Senate Budget and Fiscal Review Committee	Theresa	Peña	Working Session	8/1
California Work Opportunity and Responsibility to Kids Information Network (CalWIN) Consortia	Jolina	Lovette	Working Session	8/1
California Work Opportunity and Responsibility to Kids Information Network (CalWIN) Consortia	Jeff	Purificacion	Working Session	8/1
Center on Budget and Policy Priorities (CBPP)	Stacy	Dean	Interview	4/11
Center on Budget and Policy Priorities (CBPP)	Jennifer	Wagner	Interview	4/25
CHHS Office of Systems Integration (OSI)	Suman	Biswas	Interview; Working Session	4/18; 8/1
CHHS Office of Systems Integration (OSI)	Melissa	Diamond	Working Session	8/1

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
CHHS Office of Systems Integration (OSI)	Kristine	Dudley	Interview	4/18
CHHS Office of Systems Integration (OSI)	Dan	Kalamaras	Working Session	8/1
Coalition of California Welfare Rights Organizations (CCWRO)	Kevin	Aslanian	Focus Group	4/18
Coalition of California Welfare Rights Organizations (CCWRO)	Grace	Gallagher	Focus Group	4/18
Code for America	Monica	Beas	Interview	7/12
Code for America	Caitlin	Docker	Interview	7/12
Code for America	Dave	Guarino	Interview; Working Session	7/12; 8/1
County of Marin Health and Human Services	D'Angelo	Paillet	Focus Group	5/24
County of Ventura Human Services Agency	Maria	Maestro	Focus Group	5/10
County of Ventura Human Services Agency	Magda	Pfeifer	Focus Group	5/10
County of Ventura Human Services Agency	Laura	Wuertele	Focus Group	5/10
County Welfare Directors Association of California (CWDA)	Cheryl	Davis	Working Session	4/27
County Welfare Directors Association of California (CWDA)	Assmaa	Elayyat	Interview; Working Session	3/5; 4/27; 8/1
County Welfare Directors Association of California (CWDA)	Christian	Festa	Working Session	4/27
County Welfare Directors Association of California (CWDA)	Jazmin	Hicks	Interview; Working Session	3/5; 4/27
County Welfare Directors Association of California (CWDA)	Ricardo	Miranda	Working Session	4/27; 8/1
County Welfare Directors Association of California (CWDA)	Yvonne	Pielenz	Working Session	8/1

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
County Welfare Directors Association of California (CWDA)	Christiana	Smith	Interview; Working Session	3/5; 4/27; 8/1
Legal Aid Foundation of Los Angeles (LAFLA)	Jessica	Mark	Focus Group	4/18
Legal Services of Northern California (LSNC)	Stephen	Goldberg	Working Session	8/1
Los Angeles County Department of Public Social Services (DPSS)	Maria	Aldaco	Focus Group	5/10
Los Angeles County Department of Public Social Services (DPSS)	Maria	Galindo	Focus Group; Working Session	5/10; 8/1
Los Angeles County Department of Public Social Services (DPSS)	Fabiola	Martinez	Focus Group	5/10
Los Angeles County Department of Public Social Services (DPSS)	Oahn	Ngo	Focus Group	5/10
Los Angeles County Department of Public Social Services (DPSS)	Vardan	Poghosyan	Focus Group	5/10
Los Angeles County Department of Public Social Services (DPSS)	Ruby	Quintanilla	Focus Group	5/10
Merced County Human Services Agency	Danielle	Beliveau	Focus Group	5/24
Merced County Human Services Agency	Lizabeth	Bravo	Focus Group	5/24
Merced County Human Services Agency	Victoria	Taylor	Focus Group	5/24
Mexican American Legal Defense and Educational Fund (MALDEF)	Jeannette	Zanipatin	Focus Group	4/18
Napa County Health & Human Services Agency	Alli	Muller	Working Session	8/1
North Carolina Department of Health and Human Services	Sheri	Botts	Interview	5/23
North Carolina Department of Health and Human Services	David	Locklear	Interview	5/23

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
North Carolina Department of Health and Human Services	Angela	Taylor	Interview	5/23
Orange County Social Services Agency	Dana	Ardeleanu	Focus Group	5/10
Orange County Social Services Agency	Estera	Heiberge	Focus Group; Working Session	5/10; 8/1
Orange County Social Services Agency	Luisa	Luna	Focus Group	5/10
Orange County Social Services Agency	Maria	Manzo	Focus Group	5/10
Orange County Social Services Agency	Melissa	Polanco	Focus Group	5/10
Riverside County Department of Public Social Services	Andrea	Chavez	Focus Group	5/10
Riverside County Department of Public Social Services	Jill	Sandefur	Focus Group	5/10
Sacramento Department of Human Assistance	Brad	Legal	Carriker	5/24
Sacramento Department of Human Assistance	Linh	Do	Focus Group	5/24
Sacramento Department of Human Assistance	Tamara	Tyukayev	Focus Group; Working Session	5/24; 8/1
San Bernardino County Human Services	Stephanie	Bon	Focus Group; Working Session	5/10; 8/1
San Bernardino County Human Services	Adriana	Hermosillo	Focus Group	5/10
San Bernardino County Human Services	Scott	Neeri	Focus Group	5/10
San Diego County Health and Human Services Agency	Patty	Baker	Focus Group	5/10

ORGANIZATION	FIRST NAME	LAST NAME	TYPE OF ENGAGEMENT	ENGAGEMENT DATE(S)
San Diego County Health and Human Services Agency	Ronda	Fikes	Focus Group	5/10
San Diego County Health and Human Services Agency	Alberto	Garcia	Focus Group; Working Session	5/10; 8/1
San Francisco-Marin Food Bank	Francesca	Costa	Focus Group	4/18
Siskiyou County Health and Human Services Agency	Trish	Barbieri	Focus Group; Working Session	5/24; 8/1
Siskiyou County Health and Human Services Agency	Gabrielle	Sanders	Focus Group	5/24
Santa Clara County Social Services Agency	Kamille-Angelita	Savin	Focus Group	5/24
Santa Clara County Social Services Agency	Maria	Savin	Focus Group	5/24
Stanislaus County Community Services Agency	Catherine	Bender	Focus Group	5/24
Stanislaus County Community Services Agency	Jeanette	Fabela	Focus Group	5/24
Stanislaus County Community Services Agency	Octavia	Gardner	Focus Group	5/24
Virginia Department of Social Services	Nicole	Cox	Interview	5/18
Western Center on Law & Poverty (WCLP)	Mike	Herald	Interview; Working Session	3/13; 8/1
Yolo County Health and Human Services Agency	Lauren	Hartmann	Focus Group	5/24
Yolo County Health and Human Services Agency	Jennifer	Martinez	Focus Group; Working Session	5/24; 8/1
Yolo County Health and Human Services Agency	Jill	Twiss	Focus Group	5/24

7 Appendix B: Project Sponsors

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES (CDSS)

Leadership

Todd Bland

Kimberly Johnson

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CalFresh

Alexis Fernandez

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Automation, Integrity and Client Initiatives (formerly Program Integrity & Automation)

Kimberly Brauer

Jillian Burgos

Raquel Givon

Jessica Lopez

Virginia Lugo

Jaime Poulton

8 Appendix C: Acronyms

AIO	Agency Information Office
Applicant IEVS	Applicant Income and Eligibility Verification System
CaIACES	California Automated Consortium Eligibility System
CaIHEERS	California Healthcare Eligibility, Enrollment, and Retention System
CaIWIN	CalWORKs Information Network
CaIWORKS	California Work Opportunity and Responsibility to Kids
CDSS	California Department of Social Services
CHHS	California Health and Human Services Agency
CWDA	County Welfare Directors Association of California
DHCS	California Department of Health Care Services
FDSH	Federal Data Services Hub
ICT	Inter-County Transfer
IDR	Intelligent Document Recognition
ISD	Information Systems Division
IT	Information Technology
LRS	LEADER Replacement System
MEDS	Medi-Cal Eligibility Data System
OCR	Optical Character Recognition
OSI	Office of Systems Integration
QC	Quality Control
Recipient IEVS	Recipient Income and Eligibility Verification System
SAWS	Statewide Automated Welfare System
SIS	Social Interest Solutions
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

9 Endnotes

- 1 CDSS State Hub Project website, accessible at: <http://www.cdss.ca.gov/inforesources/calfresh/State-Hub-Roadmap>
- 2 “Tutorial: Submitting An Application,” Los Angeles County Department of Public Social Services (LAC DPSS), accessible at: https://www.youtube.com/watch?v=UuWBfJ1_BGw
- 3 Since June 2017, the receiving county may not conduct an interview or ask clients who are moving from another county to provide documentation that they had already provided until the household’s next periodic report or recertification/redetermination date. WIC §§ 10003(d)(CalWORKs), 11053.2(d)(CalFresh).
- 4 Title 7 Code of Federal Regulations (C.F.R.) Sections 273.2(f)(4)(i) and 273.2(f)(5); California Manual of Policies and Procedures (MPP) Section 63-300.5(i).
- 5 MPP § 63-300.5(h).
- 6 MPP § 44-316.324. Reporting timelines for joint CalFresh and CalWORKs cases (referred to as “Public Assistance CalFresh [PACF]” cases) should be aligned by the counties. MPP § 40-107(j).
- 7 7 C.F.R. § 273.10.
- 8 7 C.F.R. § 273.2(f)(5).
- 9 Systematic Alien Verification for Entitlements Program (SAVE), accessible at: <https://www.uscis.gov/save>