

# Recommendations for Improving The San Diego County Supplemental Nutrition Assistance Program (SNAP)

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A Report to the San Diego County Board of  
Supervisors

San Diego County Social Services Advisory Board

11/10/2010

## EXECUTIVE SUMMARY

This report San Diego County Social Services Advisory Board (SSAB) recommendations for improving the county's Supplemental Nutrition Assistance Program (SNAP), also known as Food Stamps, by simplifying the process and increasing participation, pursuant to a request by the San Diego County Board of Supervisors.

The recommendations are based on comprehensive analysis of the county SNAP process by an SSAB work group led by an ad hoc SSAB subcommittee, with participation by the county Health and Human Services Agency (HHSA) and six community based organizations (CBOs): Supportive Parents Information Network (SPIN), Caring Council, the San Diego Food Bank, the San Diego Hunger Coalition, 2-1-1 San Diego, and the Legal Aid Society of San Diego. The combined extensive experience of HHSA and the CBOs provided invaluable insights into the FS program operation and areas needing improvement.

As expected, the findings are essentially negative, since the focus of the task was to address areas where system improvements are needed; therefore, they should not be interpreted as an indictment of the county SNAP process. On the positive side, the county program currently serves more than 201,000 food stamp recipients.

However, the goal is to enroll everyone who is eligible for, and wants to receive, food stamps. The fact that HHSA data show the number of persons receiving benefits continues to increase significantly each month indicates that the goal is not likely to be reached in the near future.

Although much of the evidence received is factual. Although some evidence is anecdotal, it has withstood extensive Work Group examination and is assessed to be valid.

The SNAP process areas in which there are barriers to full enrollment, and thus need improvement, span the spectrum of system functions. The following short sample illustrates the scope of the problem:

- There is inadequate control and accounting for documents submitted by applicants, causing applicants to resubmit. Such occurrences result in increased stress on customers, and loss of confidence in the process.
- There are administrative inefficiencies resulting in applicants having to make multiple Family Resource Center visits, which in many cases is a significant hardship.

- There are documented errors and inconsistencies in the program guide materials used by county workers.
- There are errors in case records.
- The telephone call management system response to callers is slow. Customers wanting to speak with a county worker are on hold for an average of about 30 minutes.
- There are instances of administrative FS eligibility resolution taking more than the allowed 30 days.
- The automated CalWIN Notice of Action system often generates and mails multiple simultaneous notices citing different system actions, to an applicant or FS recipient on the same day. Receiving such bundle of notices, although required by regulations, typically results in added confusion and stress for the recipient.

Sixty nine recommendations are presented which, if implemented, will eliminate system barriers to full enrollment of FS-eligible persons in San Diego County, without compromising program integrity.

## **INTRODUCTION**

This report presents findings and recommendations for improving the county food stamp program and eliminating barriers to full enrollment, without compromising program integrity.

## **BACKGROUND**

The San Diego County Board of Supervisors, on July 14, 2010, requested that the San Diego County Social Service Advisory Board (SSAB) establish a time-limited Work Group to review reports and recommendations for changes to the County's SNAP process, and to provide recommendations to the SSAB for simplifying the process, increasing program participation, and maintaining program integrity. The SSAB was requested to provide its recommendations to the Board of Supervisors by December 8, 2010. Matters pertaining to the county policy regarding home visits for persons on cash assistance, or fingerprinting as required by state law, were specifically excluded from the scope of this task.

The Board of Supervisors requested that the Work Group composition consist of 2 SSAB members, one of whom would chair the Work Group; 2 members from the County Health and Human Services Agency (HHSA); members from six community based organizations (CBOs) - - 2 from Supportive Parents Information Network (SPIN), 2 from the Caring Council, 1 from the San Diego Food Bank, 2 from the San Diego Hunger Coalition, 1 from 2-1-1 San Diego, and 1 from Legal Aid Society of San Diego.

On August 12, 2010, the SSAB established an ad hoc subcommittee, designated the SNAP Subcommittee, to lead the Work Group. SSAB member Bob Brandenburg was designated to chair the subcommittee and the Work Group. SSAB chairman Philip Thalheimer was designated as the second member of the subcommittee.

## WORK GROUP MEMBERSHIP

The Work Group chair modified the membership allocations so that each participating organization had two principal members, and authorized the use of alternates in case principals were unable to attend a meeting - - subject to the constraint that no more than two representatives of each organization would attend any meeting. Work Group support staff and logistic support was provided by HHSA.

The Work Group principals were:

- Chair: Bob Brandenburg (SSAB)
- Philip Thalheimer (SSAB Chairman)
- Kim Forrester (HHSA)
- Patricia Lopez (HHSA)
- Joni Halpern (SPIN)
- Aida Reyes (SPIN)
- Bill Oswald (Caring Council)
- Don Davis (Caring Council)
- John Lucero-Criswell (San Diego Hunger Coalition)
- Jennifer Tracy (San Diego Hunger Coalition)
- Vanessa Franco (San Diego Food Bank)
- Daniela Solano (San Diego Food Bank)
- Gregory Knoll (Legal Aid Society of San Diego)
- Daniel Benson (Legal Aid Society of San Diego)
- John Ohanian (2-1-1 San Diego)
- Bill York (2-1-1 San Diego)

Cynthia Estrada (San Diego Hunger Coalition) attended one meeting as an alternate.

Board of Supervisors staff members Danny Melgoza and Stephanie Gioia attended as observers, and made numerous important contributions to Work Group discussions.

Irene Chin (HHSA) provided outstanding administrative support.

## **APPROACH**

The Work Group met for two hours once a week, for eight consecutive weeks, beginning August 23<sup>rd</sup> 2010. At each of the first seven meetings, one organization presented a report on the county SNAP operation, together with recommendations for improving the system. Each presentation was followed by a group discussion, and recommendations were compiled. An electronic copy of each report has been provided to the Board of Supervisors, to accompany this report.

The County HHSA presented the first report, to provide a baseline description of the program for the Work Group. The next six reports were presented by the respective CBOs, each of which focused on aspects of the program needing improvement, as seen from the perspective of that CBO.

The discussions generated numerous specific questions about system operation. Questions requiring information not immediately available from the HHSA members were relayed to other agency staff for response, which was unfailingly prompt.

The SSAB SNAP subcommittee component of the Work Group performed technical analysis of system performance issues such as the ACCESS telephone call management system response times.

Although the food stamp program has been renamed the Supplemental Nutrition Assistance Program (SNAP), the nomenclature transition is not yet complete. For example, the program guide is still called the Food Stamp Program Guide, and terms such as "Non-Assistance Food Stamp (NAFS) households" are still in use. Therefore, in the interest of clarity and ease of reference, this report uses the terms "SNAP", "Food Stamp", "Food Stamps", and "FS" where most appropriate.

## **FINDINGS**

This section presents the SSAB's findings, derived from the reports presented to the Work Group by the county HHSA and the CBOs, plus observations and analysis by the SSAB SNAP subcommittee members.

The task of providing recommendations for improving the county SNAP process entailed focusing on areas where the system is not performing as well as it should. Although all our findings are essentially negative, since they address areas where improvements are needed, they should not be interpreted as an indictment of the county SNAP process. On the positive side, the county program currently serves more than 190,000 food stamp recipients.

However, the goal is to enroll everyone who is eligible for, and wants to receive, food stamps. The fact that the number of persons receiving benefits continues to increase significantly each month shows that the goal has not yet been reached.

Progress toward the goal can be measured by monitoring the trend in the rate of change of the number of FS recipients. The slope of a graph showing the increasing total of FS recipients versus time will decrease as the goal is approached. When the goal is reached, the graph will level out at some approximately steady-state number that may vary slightly as people enter and leave the system. Eventually, as the economy recovers, the number of FS recipients will decrease and the enrollment curve will trend downward.

However, the enrollment trend line can be an accurate indicator of progress only if the SNAP process is free of barriers to timely enrollment of eligible applicants. The evidence received during the course of this task shows that such barriers are not only present, but that they also tend to increase anxiety among people who already are in difficult circumstances.

Our findings are listed here. They address general areas where improvement is needed, and constitute the basis for the specific recommendations in the following section. The first two findings illustrate the perils of relying on erroneous assertions about the food stamp program. The remaining items summarize the observed barriers to timely, accurate, and efficient operation of the SNAP process while maintaining program integrity.

- One report cites a U.S. Department of Agriculture (USDA) assertion that each dollar of food stamp program expenditure generates \$1.85 in economic activity. However, this result is not based on empirical evidence. It was generated about 8 years ago, in a USDA computer simulation<sup>1</sup>, and thus is a hypothetical result reflecting the model's input assumptions.
- Another report cites a Food Research and Action Center (FRAC) report<sup>2</sup> asserting that the San Diego county food stamp participation rate is 35%, the lowest in the nation. That result was obtained using obsolete data. A recalculation by HHSA, using the FRAC algorithm with the most recent data for the county, yielded a participation rate of 56.6%. But even this result could be invalid because the FRAC algorithm is fundamentally flawed. It uses numerical population constants - - derived for the national population as a whole - - to compute the proportion of the population eligible for food stamps in any given locality. This is tantamount to

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<sup>1</sup> Kenneth Hansen and Elise Golan, "Effects of Changes in Food Stamp Expenditures Across the U.S. Economy," Food Assistance and Nutrition Report Number 26-6, U.S. Department of Agriculture, August 2002.

<sup>2</sup> "SNAP Access in Urban America: A City-by-City snapshot", September 2009, <http://www.frac.org>

assuming that the demographics of every locality are identical to those of the national population as a whole. Therefore, no FRAC estimate of the FS participation rate in any locality can be considered valid unless the numerical population constants used have been validated for that locality. It is clear from FRAC's discussion of its algorithm that the constants have not been validated for San Diego county, or for any of the other localities studied.

- The county's No Wrong Door Policy, which is intended to simplify the application process, is not reflected that way in the FS Program guide. The guide states that a Family Resource Center (FRC) can either approve an application submitted there, or refer the client to another office, which contradicts the concept of No Wrong Door.
- Although the program guide states that a photocopy of an alien status card is acceptable proof of eligibility, workers request proof of a Social Security Card. There also are cases in which U.S. citizen applicants are asked to present a Social Security Card, which is not required by regulations.
- The program guide states that a client should receive a list of the documents to be provided within 10 days of application and that on the 11<sup>th</sup> day a worker must call to follow up for review, but empirical evidence shows that follow-ups are not always made.
- The program guide contains contradictory guidance. For example, one section of the guide states that the Face to Face Waiver is for all Non-Assistance Food Stamp (NAFS) households, while another section states that the waiver is for disabled and elderly only.
- The program guide contains obsolete sections that still can be accessed by workers.
- The program guide access options menu is not everywhere clear and unambiguous. Guidance received by workers tends to depend on which program entry point is selected. This impacts the content of case notes, which currently appears to be left to the worker's discretion.
- Food stamp applications pending for more than 20 days are not consistently reviewed by supervisors to ascertain the reason(s) for delay.
- The program guide is ambiguous as to how late FRCs will take same-day intake appointments, and how customer service is resolved at cutoff time.



- The program guide is not clear as to who determines which phone number(s) to insert into a CalWIN application if the customer has more than one number, and how to ensure obsolete numbers are not reentered into the record.
- The Legal Aid Society of San Diego has offered to participate in a work group to revamp all benefit program materials used by County workers. There is a clear need for a “Tiger Team”, to accomplish this task expeditiously.
- There is a need for a Total Quality Management approach to improving the SNAP process. Community partners could be used to assist in quality control.
- There is a need for a much stronger Customer Service culture at all levels in the system.
- There are instances of documents being lost, requiring applicants to resubmit. Such occurrences result in increased stress on customers, and loss of confidence in the process. Even though an applicant has a receipt for having provided a document that subsequently cannot be found in the case file, the applicant is required to resubmit the document. This problem appears to stem from two general causes: failure to immediately scan a document into the system when presented by the applicant, and failure to maintain a continuous chain of receipt/control of documents that are for any reason retained in hardcopy form. It is not clear how widespread this problem is, but even one occurrence is too many.
- There have been instances of applicants reporting to CBOs that FRC workers verbally denied them eligibility for food stamps. These could have been misunderstandings by the applicants, but the effect on the applicant is the same as if there actually was verbal denial.
- Timely processing of all applications is a goal, but not yet a reality.
- The rate of errors in determining eligibility is too high.
- The quality of service at FRCs is a function of not only the physical conditions, but also other factors such as waiting time for service and number of customer visits required to complete application requirements.

- There are customers living in rural areas, far from the nearest FRC, not well served by public transportation, who could be candidates for a mobile service similar to that used by public health nurses serving rural areas.
- SNAP process performance data are not readily available for local public inspection, without having to request copies of State reports.
- There appears to be a need for County case workers to be better trained in customer service and program rules.
- Call management system statistics show that customers calling to speak with an agent experience very long waiting times. Approximately 38% of callers abandon the call - - hang up - - after an average of about 13 minutes. The remaining 62%, who hang on until an agent answers, wait an average total of about 30 minutes. These long delays also tend to tie up available telephone lines, making it extremely difficult for new callers to even get into the queue.
- The call management system maintains statistics on how agent time is used when agents who are assigned to answer phones are not actually available to do so. This time is called Auxiliary Time, and is divided into seven subcategories: Break, Lunch, Training, Meeting, Special Projects, Coaching, and Administrative. On average, each agent spends about 15% of total on-duty time in auxiliary mode. Time at lunch or on break accounts for 10% of total auxiliary time. The remaining 5 subcategories account for 5% of auxiliary time, which amounts to an average of about 530 agent-hours of lost telephone answering time per month, which could be saved if non-break and non-lunch auxiliary duties were scheduled for periods when the agents are not assigned to answer phones.
- When a FS recipient changes residence from one county to another, the FS case in the original county is closed and the customer must re-apply in the new county, which can cause an interruption in benefits. Preliminary information indicates that this problem may be addressed in the recent State budget trailer bill.
- There is no central point - - accessible by phone, email, or personal visit - - where dissatisfied customers can register complaints.
- Resolving these issues will require time, and there will be a need for continuous oversight during that process. Reconvening a work group periodically to provide the oversight would not be a practical means of providing the required continuity.

Therefore, the SSAB has created a standing SNAP agenda item for its monthly meetings, to provide a venue for monitoring progress and for Work Group CBO members to keep abreast of progress and new issues that may arise.

## RECOMMENDATIONS

Work Group participant recommendations for improving the San Diego County SNAP process are presented here, verbatim. Those with source "All" arose by consensus during Work Group discussions. The recommendations are numbered for ease of reference; the numbers do not connote priority.

	<b>Recommendation</b>	<b>Source</b>
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; and, 6. Improve overall performance. 7. Process and Product Standards	211 San Diego
2	Develop quality as a culture in all levels of delivery system	211 San Diego
3	Create a Vision, Mission and Customer Service Statement by Reinforcing through training and staff buy in.	211 San Diego
4	Implement skills based trainings	211 San Diego
5	Ensure integrity of data (Metrics; Measurement; Gathering; Accuracy) and Add out-of-office phone based support by adding QR7 and recertification process	211 San Diego
6	Make FRCs more inviting, includes copier, coffee and play area	ALL
7	Implement procedure for County staff to deal with loss of documents	ALL
8	Embrace culture change at the County to get benefits to those that are eligible	ALL
9	Use Community Based Organization partners as a form of quality control	ALL
10	Develop a description of what is considered a pending case.	ALL
11	Create a current desk aid for guidance on issues related to: immigrant households; options for translation services; types of eligibility verifications required; alternatives for typical verifications; what eligibility workers are required to do to assist applicants in getting verifications, etc.	ALL

12	Keep County staff engaged	ALL
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	Caring Council
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.)	Caring Council
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]	Caring Council
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	Caring Council
17	Set goals for the measures identified above	Caring Council
18	Set benchmarks for assessing movement toward the goals for each measure	Caring Council
19	Review the benchmarks quarterly and re-convene the Workgroup if any or all of the benchmarks are not met. <b>(SSAB comment:</b> Resolving these issues will require time, and there will be a need for continuous oversight during that process. Reconvening a work group periodically to provide the oversight would not be a practical means of providing the required continuity. Therefore, the SSAB has created a standing SNAP agenda item for its monthly meetings, to provide a venue for monitoring progress and for Work Group CBO members to keep abreast of progress and to remain coupled to the process.)	Caring Council

20	Implement a phone reporting system to capture # of abandoned calls, # of hang-ups and how long a call waits.	Legal Aid Society
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.	Legal Aid Society of San Diego, Inc.
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	Legal Aid Society of San Diego, Inc.
23	Proper and complete Case Notes must be required.	Legal Aid Society of San Diego, Inc.
24	Different operational guides need to be created depending on how the application is received. A. Same day application and intake	Legal Aid Society of San Diego, Inc.
25	Different operational guides need to be created depending on how the application is received. B. Same day application, but not same day intake	Legal Aid Society of San Diego, Inc.
26	Different operational guides need to be created depending on how the application is received. C. One E-applications	Legal Aid Society of San Diego, Inc.
27	Different operational guides need to be created depending on how the application is received. D. Mail/Fax applications	Legal Aid Society of San Diego, Inc.
28	Complete revamping of the Food Stamp Student Guide to comply with Federal, State and County rules.	Legal Aid Society of San Diego, Inc.
29	Review of all County created Food Stamp Program forms to make sure that they are updated and obsolete forms are removed.	Legal Aid Society of San Diego, Inc.
30	LASSD offers to be part of a technical workgroup that does a revamping of all benefit program materials used by County workers	Legal Aid Society of San Diego, Inc.
31	Hold training for County Employees	SD Food Bank
32	Build user friendly website	SD Food Bank
33	Develop application tracker	SD Food Bank
34	Open phone line on ACCESS	SD Food Bank

35	Improve training, monitoring & accountability	SD Hunger Coalition
36	Improve capacity for and culture of accountability and customer service	SD Hunger Coalition
37	Make ACCESS accessible. (See recommendation # 61)	SD Hunger Coalition
38	Create an accessible complaint process	SD Hunger Coalition
39	Improve language access	SD Hunger Coalition
40	Address high rate of lost documents	SD Hunger Coalition
41	Address over-verifications	SD Hunger Coalition
42	Address high negative error rates	SD Hunger Coalition
43	Partner with CBOs to conduct out-of-office outreach	SD Hunger Coalition
44	Ensure efficient use of limited HHSA resources	SD Hunger Coalition
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.	SPIN
46	Set and maintain a standard for case notes so that a coherent story can be told for each client. [Check existing standards in health, mental health, etc.]	SPIN
47	Create and maintain internal advocate(s) whose responsibility is to resolve problems in cases as they arise.	SPIN
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.	SPIN
49	All case files are to be updated daily	SPIN
50	All clients are to be notified in a timely manner if there is any change in their case and/or status.	SPIN
51	Workforce performance goals and incentives reflect the goal of increasing participation in HHSA programs.	SPIN
52	Develop and maintain means of insuring workers are keeping up to date with rules and regulations as published in Food Stamps Regulations, All County Letters, Special Notices, Program Guide, etc.	SPIN

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.	SPIN
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.	SPIN
55	<p>Create a "complaint" process that allows clients to file complaints that go directly to the Social Services Advisory Board – not through HHSA.</p> <p><b>(SSAB comment:</b> This would not be practical. The SSAB meets only once a month, and does not have the administrative resources to handle formal complaints. Clients can present brief comments to the board during the public comment portion of the monthly meeting agenda.)</p>	SPIN
56	<p>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.</p> <p><b>(SSAB comment:</b> Clients can present brief comments during the public comment portion of the monthly meeting agenda.)</p>	SPIN
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.]	SPIN
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	SPIN
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.	SSAB
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.	SSAB



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.	SSAB
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.	
63	Use public service announcements on radio, TV, and buses, to advertise the FS program and where to get information about how to apply.	SSAB
64	Establish and advertise a single point where clients can register complaints.	SSAB
65	Post SNAP process performance data on-line, for ready access by the public.	SSAB
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.	SSAB
67	Institute measures to ensure - - without exception - - that all FS applications are resolved within 30 days.	SSAB
68	Institute measures to ensure that every document presented by an applicant is immediately scanned into the system, and that 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.	SSAB
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.	SSAB

## PRIORITIZING RECOMMENDATIONS

We advise pursuing all recommendations concurrently, since they address critical needs.

And, we agree with the Legal Aid Society's argument, in recommendation 21, that the problem of inconsistent and inaccurate information on how to administer the Food Stamp Program must be addressed before resources are changed or moved.

However, correcting program guide problems need not delay work on other recommendations. Implementation of those not requiring resource changes can be concurrent with the program guide work. Recommendations with resource implications will require potentially extensive analysis. Doing the analysis concurrently with the program guide work will save time and allow the recommendations to be implemented when the corrected program guide is in place.

In the event that circumstances require prioritizing recommendations, it would be necessary to account for the complex multi-faceted impacts of each change. SPIN and Caring Council have provided the following procedure as an example of how this problem could be approached.

The process ranks recommendations based on five priority categories, weighting each category on its importance, and then using both category and weight to rank the recommendations.

### Priority Categories:

PRIORITY CATEGORY	DEFINITION
Impact on Clients	<p><b>Recommendations that impact the:</b></p> <ul style="list-style-type: none"> <li>○ Time it takes to get benefits from submission of application to determination</li> <li>○ Number of false denials</li> <li>○ Length of time it takes to implement an Out of Hearing Resolution</li> <li>○ Length of time a clients application is considered "pending"</li> <li>○ Refusal to give applications to potential clients</li> <li>○ Verbal denials</li> <li>○ Length of time spent at FRC</li> <li>○ Number of trips to the FRC</li> <li>○ Length of time waiting on ACCESS call</li> <li>○ Capacity of ACCESS address issues presented by client</li> <li>○ Access to an individual who is knowledgeable of case and can provide support and direction</li> <li>○ Overall experience at the FRC (e.g., clean, comfortable and attractive waiting room; space for children with materials; place to eat/drink; access to copier phone, etc.)</li> </ul>
Level of Change	<p><b>Recommendations that require:</b></p> <ul style="list-style-type: none"> <li>○ Modifying an existing process</li> </ul>

	<ul style="list-style-type: none"> <li>○ Eliminating existing or creating a new process</li> <li>○ Levels of the organization that must be involved in carrying out recommendations (Vertical)</li> <li>○ Number of departments or sections that must be involved in carrying out recommendations (Horizontal)</li> <li>○ Changes in lines of authority</li> <li>○ Changes in job descriptions</li> <li>○ Changes in pay scales</li> </ul>
Impact on Culture of the Organization	<p><b>Recommendations that address:</b></p> <ul style="list-style-type: none"> <li>○ Staff understanding of role (e.g., providing assistance v. protecting the public dollar)</li> <li>○ Level of staff knowledge of various cultures and languages among clients</li> <li>○ Level of staff knowledge of poverty, its causes, how it is maintained, and the challenges confronted by people living in poverty</li> <li>○ Client experience at FRC, ACCESS, etc. [externally assessed]</li> <li>○ Mechanisms for getting and incorporating client feedback</li> </ul>
Implementation Time	<p><b>Implementation time:</b></p> <ul style="list-style-type: none"> <li>○ Immediate (within three months)</li> <li>○ Intermediate (within six months)</li> <li>○ Long-term (more than six months)</li> </ul>
Cost	<p><b>Recommendations that impact the budget:</b></p> <ul style="list-style-type: none"> <li>○ What is the dollar amount?</li> <li>○ Do the funds presently exist?</li> <li>○ Does funding require reallocation of existing funding?</li> <li>○ Is new/additional funding required?</li> <li>○ Who can authorize funding (HHSA or Board of Supervisors)?</li> </ul>

**Weighting Categories:** SPIN and Caring Council propose that the priorities be weighted based on their importance and necessity as follows:

1. **Impact on Client:** These recommendations will have the greatest impact on the participation rate, and should receive the greatest weight.
2. **Level of Change:** Systemic changes should receive the second highest weight.
3. **Impact on Culture of the Organization:** Because change can only be sustained if it becomes part of the organizational culture, these recommendations should receive the third highest weight.
4. **Implementation Time:** Lasting change is seen as more important than quick changes, so these would have the fourth highest weight.

5. **Cost:** While cost is always an issue, it is given the lowest weight, in part because it is assumed that the County would receive additional funding if participation rate increased, thereby offsetting some of the costs of these changes.

**Process for Prioritizing:**

1. Each recommendation would be rated as “High,” “Medium,” or “Low” for each priority category. For example, the recommendation, “Provide Language Line services in all FRCs” might be rated as follows: high on “Impact on Client;” low on “Level of Change;” low on “Impact on Culture;” medium on “Implementation Time;” and, “medium” on cost.
2. Once all recommendations are rated, pull out the recommendations within the “Impact on Client” category that are rated “high” and report them as the highest priority.
3. The second tier of recommendations would be those that are rated “medium” for Impact on Client and “high” for Level of Change.
4. This process would be continued until all recommendations are ranked.

**SSAB comment:** The sample procedure proposed by SPIN and Caring Council, while feasible, is an excellent illustration of not only the inherent complexity of ranking recommendations, but also the potential for exponentially increased complexity if the factors governing priority categories change. We reiterate our advice to pursue all recommendations concurrently.

## **SUMMARY**

This report has presented 69 recommendations for improving the county SNAP process which, if implemented will eliminate system barriers to full enrollment of FS-eligible persons in San Diego County, without compromising program integrity.



