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Administrative Conference of the United States  
1120 20<sup>th</sup> St. NW, Suite 706 South  
Washington, DC 20036

Re: Reduction of Administrative Burdens in Customer Service

Thank you for the opportunity to share suggestions on the ways administrative agencies can reduce burdens and barriers to efficient and effective customer service provision.

These comments are from advocates working in California on programs impacting low-income individuals. Our client base routinely interacts with public administrative agencies regarding benefits and services, including TANF family cash aid, SNAP food assistance, Medicaid, Unemployment and Social Security. They generally have transportation, cell phone/phone data, and computer access issues, and have a high prevalence of disabilities and language barriers. Uniformly, the process of attempting to access subsistence benefits is fraught with inefficiencies, delays and barriers that deprive our clients of subsistence benefits they urgently need, and require repeat handling of cases that are denied and have to be reopened, appealed or new applications submitted. Submission of required verification and application/renewal paperwork, and reporting changes or getting case information pose the greatest barriers, and are a constant struggle.

Our clients generally can use the benefits once received, although electronic theft (skimming and scamming) remains a large problem. Unlike all other people using Point of Service debit-type cards, people on public benefits who are required to use Electronic Benefits Transaction (EBT) cards are excluded from basic card protections. Western Center and other California legal organizations have already submitted comments to the Consumer Financial Protection Bureau (CFPB) opposing the Bureau's proposal to continue excluding EBT cards from financial protections.

We suggest improving the following areas:

- Access issues for unsheltered client or clients with disabilities
- Mail issues
- Service when Interactive Voice Recognition system or "Phone bank" (vs. individual worker) services are used
- Making permanent flexibilities provided during COVID-19, permitting greater access to conducting business virtually or electronically

These suggestions are discussed below.

### ***Eliminate Inefficient Supervisory Review***

Unnecessary levels of supervisory review at benefits-granting agencies delay provision of critical assistance to beneficiaries. Agencies add extra steps to require supervisors to approve the issuance of benefits to an applicant, even when fraud and questionable information are not at issue. Given the high volume of cases that these agencies handle, requiring a supervisor to review and approve decisions on individual applications creates serious bottlenecks that hamper the administration of these programs.

### *Examples*

- SNAP Expedited Services

Under the provisions of the Supplemental Nutrition Assistance Program (SNAP), applicants who are in acute need of food assistance (i.e. those who have less than \$150 in monthly income or whose shelter costs exceed their income and savings) are entitled to receive benefits within seven calendar days if they qualify for the program. In the State of California, welfare departments are required to issue CalFresh benefits (the state's SNAP program) within three calendar days to applicants who meet these criteria. This "Expedited Services" policy recognizes the urgency of these cases and the serious harm that befalls individuals and families who do not have money to feed themselves.

In the County of Los Angeles, which has the highest level of poverty in the State, the welfare department failed to issue benefits within three calendar days for nearly 50% of the applicants who were eligible. Los Angeles advocates sued the County welfare department for their failure to implement the "Expedited Services" provisions.

In response, the County evaluated and revised its internal processes. One of the most impactful changes that the department made was removing the requirement that a supervisor sign off on the approval and issuance of expedited benefits. Approving Expedited Services involves the same review of eligibility factors as non-expedited cases, but only the Expedited Services approvals required supervisory review. This cleared a serious bottleneck in the County's processes and resulted in near complete compliance: roughly 98% of applicants who were eligible for expedited benefits received them.

- EBT Card Benefits Replacement

Beneficiaries of SNAP and cash programs like TANF receive their payments on an Electronic Benefits Transfer (EBT) card, which functions like a debit card. Unfortunately, these cards do not have the level of security that bank-issued debit cards have. Benefits recipients are regularly subject to electronic theft of their SNAP and TANF payments, leaving them without money to pay for food, rent, gas, etc.

The process of requesting reimbursements from county welfare departments can be arduous, and people often experience significant delays in receiving their reimbursement. This can be exacerbated by unnecessary review of reimbursement approvals by supervisors. In Los Angeles County, supervisors are required to sign off

before reimbursement can be issued. Interestingly, there is no internal requirement that supervisors review denials of reimbursement requests. This added layer of review slows down the reimbursement process and leaves families without vital assistance.

“Supervisory approvals” are used by local and state TANF, SNAP and Medicaid agencies to discourage approval of benefits. Denials of benefits are never subject to required supervisory approval.

### ***Require Acceptance of Telephonic and Electronic Signatures***

The expanded use of telephonic signature technology by benefits-granting agencies during the pandemic has been enormously helpful. The logistical challenges of getting wet signatures causes unnecessary delays and unfair denials/terminations. Requiring wet signatures on documents burdens applicants and beneficiaries who are unhoused, elderly, and/or have disabilities. These applicants go into an agency office to sign documents, which can be very difficult for those with mobility issues. Applicants and recipients who must wait to receive and return documents by mail, experience problems with timely submissions due to slow mail delivery, and those who do not have a fixed address are disadvantaged.

Telephonic signature technology allows applicants/beneficiaries to complete applications and renewals entirely over the phone. This technology has been used more widely during the pandemic and has improved access to benefits. Benefits-granting agencies should ensure though that they offer telephonic signature options for *all* necessary forms.

#### ***Example***

- Partial electronic signature application processes  
The State of California administers a program called the Cash Assistance Program for Immigrants (CAPI) that assists people who are 65+ and/or disabled and who do not qualify for SSI because of their immigration status. To qualify for CAPI, applicants have to have very little income and low resources.

While many of the CAPI application forms can be completed telephonically, there are two forms that applicants have to sign by hand. If these forms are not completed, the application will be denied. For clients who are elderly and/or disabled and/or indigent (as so many CAPI applicants are), this requirement remains a major burden to accessing the program.

Agencies should standardize their telephonic signature processes and ensure that this is an option for all necessary forms.

### ***Expand Acceptance of Telephonic and Virtual Meetings/Apearances***

During COVID-19, many agencies that normally required in person appearances, such as for benefits interviews or court appearances, permitted virtual participation. Platforms such as Zoom, WebEx and others have become commonly used and deemed sufficiently secure. Many states or county offices for state program only have single sited offices, although serving large geographical areas. Winter road conditions and disasters can interfere with road transportation. Low-income households may not be able to afford or have reliable transportation to attend in person meetings and appearances. The California courts and legislature have returned to their regular rules: the party must be more than 50 miles away to appear by phone. The legislature is

phased out virtual testimony, although temporarily continuing phone in appearances. This limits civic participation, when no issues were apparent from the emergency measures during COVID.

### ***Improve Access to Mail Delivery***

The U.S. mail delivery has slowed substantially. Fewer offices are holding general delivery mail, and those that do limit the length of the hold. Government offices are not providing alternatives for holding mail to those without a fixed or safe mailing address. See Western Center's policy paper, [\*Return to Sender: : How an Unreliable Mail System Harms Californians Living in Poverty\*](#), for a full discussion of the problem and proposed solutions.

In addition, the major public benefit programs provide only 10 days to respond to notices, even if mailed. With mail routinely taking 4-7 days to arrive/be delivered, it is nearly impossible to comply with the notice in a timely manner. Limits on cell phone access, and limited data plans restrict the ability to get emails that state the agency has issued a notice. If a person does not get a notice prior to the action taking place, they generally will not qualify for their aid to remain the same pending a hearing. This means they are completely cut off subsistence benefits for as long as several months while waiting for a resolution to their hearing. Many clients are unaware that they could reapply for benefits in the interim, and even if aware, have to wait for application processing. Sometimes they are even discouraged from reapplying by agency workers who don't want the agency to be handling the case on two fronts, on an appeal and an application for the same client.

Issues in receiving US mail interferes with the ability of low-income individuals, especially those who are unsheltered or living with disabilities, to obtain and maintain social benefits. Expanding access, at least with government agencies for civic and public benefits services, would prevent wasteful "churning" of applications and repeat administrative corrections when mail is delayed.

### ***More Effective Interactive Voice Recognition (IVR) and Phone Banks***

During recent recessions, government agencies reduced staff answering phone and servicing cases. As a result, more agencies are using IVR (or phone trees) to provide static information and redirect calls, and "phone banks" or "banked caseloads" where staff work in pools on cases. Both these systems could be a "win-win" if done properly, but often low-level systems that do not handle all the needs, and insufficient staff training/monitoring leads to long wait times, frequent dropped and disconnected calls, language and disability access barriers, lack of follow through and no accountability or tracking.

- IVR systems must have "up front" language options to direct calls to the correct language recordings. The agency must include all commonly used languages – which may have a higher frequency of particular language for phone services due to limited education, functional illiteracy, age, and disabilities, compared to the larger service population of the agency which may be more comfortable with written instructions and online services.

The systems should state up front how to repeat the menu of options, and not have too many options to get to the first branching off. All systems should have a "0" option to reach an operator.

Agencies must monitor hang ups, dropped calls and wait times, and have effective plans for providing additional coverage if those numbers go up.

- Phone banks/banked systems should have sufficient staff training and wait time monitoring. There should be a board that displays backlogs and a floating staff person monitoring the board, who can redirect calls when a staff person is backing up and take other measures to reduce time. Calls need to be logged immediately into the case system, along with a worker name or number for accountability and tracking. Matters that can be fully resolved within a specified time should be completed, and seen through to the final stage in the any automation so that the consumer's problem is done and no further contact needed.

Phone staff need to have the ability to quickly view case status and set appointments, if needed, as well as take phone-reporting (when permitted under agency rules) on the spot and completed with a telephonic signature.

Special lines should be set up for technical assistance for online systems, to not clog up the regular phone lines for people who cannot use online systems.

Phone banks also need to have a backup worker who can spend longer resolving the consumer's problem, so that further calls are not needed. If the initial staff person realizes that the person needs an appointment or paperwork they must be able to set the appointment and generate sending the paperwork.

Thank you for considering these suggestions.

Sincerely,

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