



CCWRO Welfare News-2019-08 September 5, 2019

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Stephen Goldberg, Legal Services of Northern CA, Honored by CDSS



On August 6, 2019, CDSS presented Stephen Goldberg, Regional Counsel of Legal Services of Northern California, with a CDSS Lifetime achievement award for his advocacy on behalf of his law-income clients. Stephen's biography follows.

Stephen is the classic polymath—he can do everything. Before he graduated from McGeorge, like any aspiring attorney, he competed in mock trial in high school and debated in college. He won a top attorney award in mock trial competition and a national economics writing contest.

After graduating from High School in Palo Alto in 1987, Stephen attended UC San Diego. Stephen majored in political science with minors in history and law and society. He graduated *cum laud* with honors. Thereafter Stephen attended McGeorge School of Law and graduated in 1994. He received the American Jurisprudence award for Federal Courts.

After law school, Stephen did not choose the career that one would expect. He dedicated his life's work to three things: public interest advocacy, training young minds, and music.

Stephen started his long and active law service in public interest law focusing on housing and public benefits. He elected to work for the Human Rights/Fair Housing Commission and Legal Services of Northern California as a staff attorney. He then worked for Lawyers for Civil Justice and the Coalition of California Welfare Rights Organizations for a short time before rejoining LSNC.

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County Practices Result in California's Low CalFresh Participation Rate

California is at the bottom of the barrel for CalFresh/SNAP participation in the United States. Only Utah, North Dakota and Wyoming have lower rates than California.

California spends millions on outreach and has the highest administrative costs in the country. Unlike most other states, California's 58 counties operate its CalFresh program. This results in 58 different policies and procedures to process CalFresh applications. Counties seem to be more interested in denying or closing Cal Fresh cases than authorizing benefits to starving families. It is not unusual for a child to go to bed hungry because their parents did not satisfy the county-specific procedural requirements. As the Table below demonstrates, over 50% of the April 2019 CalFresh applications were denied because of "procedural requirements" as opposed to the applicants being found ineligible. It is noteworthy that 78 % of the CalFresh denials in San Diego County are due to procedural denials. Similarly, the denial rate in San Francisco is 78%; Contra Costa, 77%; Orange, 74%; Riverside, 71%; Alameda, 74%; and Stanislaus, 63%.

"Procedural Reasons include such things as the household failed to complete the application process by not signing the application, not attending the interview, or failed to provide the requested verification."

Source: CDSS CF 296 Instructions.

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Goldberg Honored (cont'd from page 1)

As a representative for advocates statewide, Stephen has reviewed countless draft regulations, All County Notices, and All County Information Notices for the CalWORKs, CalFresh, IHSS, and RCA programs and provided invaluable input. After LSNC's regional counsel, Jodie Berger, became a SHD judge, Stephen became acting regional counsel and took Jodie's place as key advocate for public benefits.

Stephen frequently gives voice to the advocate community in the State Hearings Arena. Not only does he provide well-reasoned comments to proposed State Hearing regulations and procedures, but he also doggedly participates in sub-committee meetings such as SB320 and ACMS. Stephen is a well-respected and much sought after panelist at the SHD's Statewide Training Conference.

Stephen is also a life-long debater who selflessly coaches several high school debate teams, including McClatchy High School in Sacramento and Nevada Union High School in Grass Valley each week. Stephen had a cameo appearance in a documentary movie about high school debate in 2007. Each January, the Debate organization announces the national debate topic for the next year. During the summer, Stephen conducts research on the topic and develops pro and con arguments. Then, from September to June, Stephen travels to Grass Valley and McClatchy almost every week to help students prepare for the debate tournaments.

Stephen is the founder and president of the Sacramento Urban Debate League. After much work and politicking, he secured the National Catholic Forensic League National competition. The competition is held in Sacramento at multiple locations, including McClatchy High School, the Sacramento Convention Center, and Sacramento State University.

Stephen shares his love for the law by teaching courses to undergraduate paralegal students at American River College in landlord tenant law and administrative law. In this way, he can be Professor Goldberg. He is also a mentor to new attorneys at LSNC and through Legal Aid Association of California, a statewide organization for legal services programs.

Finally, if these activities were not enough, Stephen plays trombone in the Sacramento City College Jazz Band. The band holds at least four concerts during the school year. He practices trombone at his LSNC office at 11:00 P.M. and has been told not to give up his day jobs. At some point during each concert, he has a solo. He usually gives a heads-up for the concert an hour in advance in the hope that no one can come.

CCWRO is honored for Stephen's friendship and support.

County Practices (cont'd from page 1)

A failure to sign a CalFresh application is confusing since 58% of the CalFresh applications are filed in person while the remaining 42% are filed on-line. It is puzzling how an application could be submitted without being signed.

Another reason that counties deny an application is for "not attending" an interview. Frequently, missed interviews are the result of the county dictating the time and place of the appointment interview without considering whether the time and place is convenient for the applicants. Many times the applicant has to take the kids to school, or the doctor. Once the county sets the time and place for the appointment interview, it is difficult for the applicant to request a change in the appointment. In most counties, applicants do not have workers. Even if they have an assigned worker it is hard for the applicant to contact the worker. In counties that use call centers, it is nearly impossible for the applicant to change an appointment.

Counties frequently deny CalFresh benefits for failing to provide verification which is unnecessary to demonstrate eligibility. Counties often request a long list of documents from households to prove CalFresh eligibility. If the county doesn't receive the extraneous documents, the case will be closed.

Every month, counties are required to submit a **CF 296** report detailing the number of applications received, the number denied because the household is ineligible, and the number denied for procedural reasons.

Some counties, like Sacramento and Santa Clara simply do not submit the report. Nevertheless, CDSS continues to issue funding to non-reporting counties. What happens to CalFresh beneficiaries who do not report - benefits stopped summarily.

See page 3 for county-by-county application denials due to procedural (bureaucratic).

(Cont'd on page 3)

May 2019 CalFresh Applications Denials

May, 2019 - CF 296		Ineligibility Denials	Procedural Denials	Procedural Denials As Per- centage of Total Denials
Statewide	County Size	35168	35228	50%
Sacramento	Large	NO REPORTS		
Santa Clara	Large	NO REPORTS		
Alpine	Very Small	0	1	100%
Mono	Small	2	15	88%
Colusa	Small	4	19	83%
Napa	Medium	18	85	83%
Placer	Medium	58	253	81%
San Luis Obispo	Medium	55	213	79%
Amador	Small	11	41	79%
San Diego	Large	1036	3778	78%
San Francisco	Large	207	736	78%
Yolo	Medium	75	261	78%
Contra Costa	Medium	187	627	77%
Santa Barbara	Medium	150	478	76%
Solano	Medium	125	398	76%
Orange	Large	708	2017	74%
Alameda	Large	443	1242	74%
San Mateo	Medium	143	399	74%
Ventura	Medium	166	445	73%
Riverside	Large	1661	4067	71%
Nevada	Small	59	141	71%
Santa Cruz	Medium	84	184	69%
Sutter	Medium	61	131	68%
Glenn	Small	22	47	68%
Butte	Medium	319	579	64%
El Dorado	Medium	108	194	64%
Stanislaus	Medium	452	776	63%
Fresno	Large	601	996	62%
Shasta	Medium	272	427	61%
Monterey	Medium	216	338	61%
Madera	Medium	86	132	61%
Tuolumne	Small	44	67	60%
Del Norte	Small	47	66	58%
Tehama	Small	143	199	58%

May 2019 CalFresh Applications Denials

**May, 2019 - CF
296**

**Ineligibility
Denials**

**Procedural
Denials**

**Procedural
Denials As Per-
centage of Total
Denials**

San Benito	Small	16	22	58%
Mendocino	Medium	76	103	58%
Kern	Medium	951	1278	57%
Tulare	Medium	219	289	57%
Lassen	Small	24	29	55%
San Joaquin	Medium	576	657	53%
Siskiyou	Small	67	72	52%
San Bernardino	Large	2246	2212	50%
Marin	Medium	143	134	48%
Inyo	Small	13	12	48%
Trinity	Small	36	32	47%
Calaveras	Small	52	46	47%
Plumas	Small	15	13	46%
Merced	Medium	575	475	45%
Modoc	Small	16	13	45%
Mariposa	Small	31	22	42%
Humboldt	Medium	672	463	41%
Imperial	Medium	255	171	40%
Kings	Medium	281	165	37%
Yuba	Small	143	83	37%
Los Angeles	Very Large	19047	9455	33%
Lake	Medium	481	126	21%
Sonoma	Medium	1665	4	0%
Sierra	Small	5	0	0%

County CalFresh Victims of the Month

Alameda County Denies Cal-Fresh Application For Not Keeping Future Appointment.

Ms. 10456838 applied for CalFresh on February 22, 2019. The February 25, 2019 notice denied the CalFresh application for not keeping the 7:30 AM Cal-Fresh interview appointment scheduled for February 26, 2019. Ms. 10456838 filed for a state hearing indicating that she disagreed with Alameda County's decision. The Alameda County appeals unit reviewed the case and decided that the county acted appropriately and that any reasonable person would have completed the interview.

The county argued under oath that Alameda County was right to deny the application for not keeping the CalFresh appointment on February 26, 2019 at 7:30 am, even though the county mailed the denial letter on February 26, 2019. This is another example of the so-called "procedural reasons" that Alameda County uses to justify denying 74% of its CalFresh applications.

CalFresh Punishes Beneficiaries Who Work In Los Angeles County.

Ms. 104572890 is a beneficiary of the CalFresh program. In 2018, Ms. 104572890 worked and reported her employment on the SAR 7 but subsequently lost her job prior to December 2018. In January 2019, she received a new SAR 7. The county explained that she should put down all of the information for the report month that is on the upper right-hand side of the SAR 7. The January 1, 2019 SAR-7 asked:

"Did anyone get income from employment in the Report Month? Yes No

(If yes, complete the section below and attach proof).

The Report Month is listed at the top of the first page. List each job for each person who works.

If you need more space attach a separate piece of paper. Examples include baby-sitting, salary, self-employment, sick pay, tips. Etc. If you lost your job, attach proof."

Ms. 104572890 completed the SAR7 and reported no income because in the report month she had no earned or unearned income. On January 30, 2019 she received a notice of action stating that her CalFresh benefits would stop effective March 1, 2019 "because you did not submit a complete Semi-Annual Report (SAR-&) for December 2018."

Los Angeles County succeeded in punishing Ms. 104572890 for working and then not having a job in December 2018 to report. The county's termination of benefits was upheld by the State Hearing decision.

Los Angeles County Denies Cal-WORKs Application For Not Keeping An Unscheduled Face-To-Face Appointment.

On January 31, 2019 Ms. 104570613 and her three children applied for CalWORKs in Los Angeles County. Ms. 104570613 completed her scheduled telephone interview on February 27, 2019. On April 19, 2019, Ms. 104570613 received a notice of action stating the denial of her ap-

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Los Angeles County (Cont'd from page 5)

plication because she failed to complete the face-to-face interview. LA County never scheduled a face-to-face interview. After spending millions of dollars on a new computer system, the computer still denies applications for not keeping a face-to-face interview that was never scheduled. The other problem with this case is that the County denied the application took place on the 70th day and not the 45th day.

Orange County Uses Blocked Numbers to Complete CalFresh Interviews.

Given the proliferation of spam callers whose sole purpose is to defraud unsuspecting individuals, law enforcement and advocates recommend that unknown or blocked numbers should not be answered. In keeping with this advice, Ms. 1BBWS63 of Orange County programmed her phone to not accept calls from blocked numbers. Ms. 1BBWS63 applied for CalFresh at the age of 79 years. 211 helped her with the application and transmitted documents to the Orange County Welfare Office. She received a letter from her worker, Ms. Saylor informing her that she had a telephonic interview at 10 am. When she did not receive a call, she called the worker, Ms. Saylor, who then conducted the interview. During the interview she was informed that the worker had, in fact, called from a blocked number. As Ms. 1BBWS63 receives so many spam calls, her phone blocked the CalFresh worker's call. The county worker also said that the county never got the verification that was transmitted to them by 211. She had to mail another packet of the same information to Orange County.

IHSS Call Center: Long Waits, Few Resolutions in LA County

The Los Angeles County Department of Public Social Services has provided CCWRO with 2019 call center statistics in response to a California Public Records Act Request. The records paint a picture of a time-consuming and unhelpful process for IHSS recipients and providers, matching the anecdotal reports of recipients and advocates.

Excessive Wait Times. Callers abandoned around half of all calls coming into the help line. This high abandonment rate probably results from the long wait times. The majority of abandoned calls occurred after more than 20 minutes in the wait queue. On average, callers waited 20-30 minutes to speak with a person.

Ineffective Self Service. Callers who tried using the automated Self Service system found this option particularly unhelpful. Only about 35% of callers resolved their issues or questions through Self Service. This means that 2 out of 3 callers wasted their time using Self Service and still had to wait 20-30 minutes to speak with a worker.

Unprepared Workers. Once the callers actually spoke to a helpline representative, they only had a 60% chance of speaking with a worker who was "ready" to address their issue. In 2019, social workers received about 30,000 calls per month and resolved only about 11,000 of those calls, a resolution rate of around 36%. Senior Clerks received about 70,000 calls per month and resolved about 40,000 of those calls, a 57% resolution rate. In July 2019, callers who waited the 20-30 minutes to speak to a human still had their issue resolved less than 50% of the time.

Stagnant Improvement. The statistics show little improvement over time from the beginning of 2019. In fact, July saw a notable uptick in wait times and abandoned calls. This highlights the problems with LA County's attempt to depersonalize and automate duties once performed by IHSS caseworkers familiar with individual case files and recipients. It suggests that the county has devoted insufficient training and resources to support and improve the call center.

IHSS Helpline Monthly Statistics 2019									
I. Calls Received									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	Call entering Helpline	158,834	152,287	152,440	142,057	138,091	132,882	156,708	
B.	Calls received by Helpline Social Worker	27,509	25,040	24,912	26,876	27,937	27,263	32,875	
C.	Calls received by Helpline Senior Clerk	82,966	80,471	74,370	72,906	66,207	61,026	70,892	
D.	Calls resolved by Helpline Social Worker	11,266	10,181	9,897	11,681	11,639	11,113	11,440	
E.	Call resolved by Helpline Senior Clerk	38,412	35,905	38,437	39,849	42,814	38,877	40,171	
F.	Calls abandoned	59,569	58,559	50,247	47,668	38,994	37,668	51,142	
G.	Abandonment Rate	55.03%	56.32%	51.32%	48.36%	42.16%	43.38%	50.26%	
II. Self-Service Authentication									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	Calls entering Self-Service	65,054	63,764	62,187	56,261	55,412	57,185	63,945	
B.	Calls resolved via Self-Service	22,545	24,273	20,082	19,109	19,601	19,507	21,351	
C.	% of calls resolved via Self-Service	34.66%	38.07%	32.29%	33.96%	35.37%	34.11%	33.39%	
D.	Calls returning back to agent after Self-Service	42,509	39,491	42,105	37,152	35,811	37,678	42,594	
E.	% of calls returning back to agent after Self-Service	65.34%	61.93%	67.71%	66.04%	64.63%	65.89%	66.61%	
III. Calls Abandoned by Time in Queue									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	0 to 1.3 minutes	10,651	10,906	9,390	9,193	7,760	6,180	7,966	
B.	1.3 to 3 minutes	4,774	4,732	4,174	4,131	4,165	4,188	5,062	
C.	3 to 5 minutes	4,882	4,716	4,303	4,169	4,107	3,556	4,351	
D.	5 to 10 minutes	9,170	8,618	7,910	7,649	7,105	6,641	8,075	
E.	10 to 20 minutes	11,670	11,368	10,072	9,715	7,346	7,717	10,204	
F.	> 20 minutes	18,422	18,219	14,398	12,811	8,511	9,386	15,484	
IV. READINESS DATA									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	% Ready	61.61%	62.88%	62.16%	61.49%	63.75%	64.74%	65.83%	
B.	% Not Ready	38.39%	37.12%	37.84%	38.51%	36.25%	35.26%	34.17%	
V. Average Handle Time by Skill Group									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	Social Worker	0:13:28	0:13:05	0:12:57	0:12:43	0:12:45	0:12:49	0:12:17	
B.	Senior Clerk	0:09:03	0:09:03	0:09:40	0:09:53	0:09:31	0:09:44	0:09:54	
C.	Average Handle Time	0:10:05	0:09:59	0:10:21	0:10:32	0:10:13	0:10:25	0:10:27	
VI. Average Wait Time by Skill Group									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	Social Worker	0:29:36	0:27:29	0:30:28	0:30:13	0:32:40	0:34:18	0:39:38	
B.	Senior Clerk	0:28:07	0:29:33	0:26:47	0:24:27	0:15:15	0:17:31	0:21:55	
C.	Average Wait Time	0:28:26	0:28:58	0:27:37	0:25:57	0:20:24	0:22:43	0:27:32	
VII. Tracking Tickets									
		Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
A.	Total Tracking Tickets	54,814	51,348	52,679	55,382	56,528	53,200	52,060	
B.	Total Tracking Tickets sent to D.O.	8,988	8,311	8,968	9,870	9,856	8,662	8,860	
C.	% Tracking Tickets sent to the D.O.	16%	16%	17%	18%	17%	16%	17%	
D.	Total Tracking Tickets closed at Helpline	45,801	43,037	43,711	45,512	46,672	44,520	43,178	
E.	% Tracking Tickets closed at Helpline	84%	84%	83%	82%	83%	84%	83%	

The Truth About Improper Payments - Mostly Caused by Food Stamp/ SNAP/ CalFresh Agencies and not beneficiaries

DATE: November 8, 2018 - AUDIT NUMBER: 27401-0003-11

- As **60 percent** of SNAP's payment errors are caused by State agencies, FNS works with States to strengthen the upfront eligibility determination process through system improvements, policy training, improved data matching and verification.
- The remaining **40 percent** of payment errors are client caused. FNS works with States to improve client education efforts and the clarity of notices to ensure application and reporting instructions are clearly conveyed.

Gil H. Harden, FNS Assistant Inspector General for Audit - Washington, D.C. - November 7, 2018