

## NEVADA COUNTY BOARD OF SUPERVISORS RESPONSES TO

### 2020 Nevada County Civil Grand Jury Report

#### Report on responses to the 2019-2020 Grand Jury Report: *CalFresh in Nevada County: Leaving Food (and Money) on the Table*

DATED August 25, 2020

In accordance with California Penal Code § 933.05(b), the Nevada County Board of Supervisors is responding to the Nevada County Civil Grand Jury FY 2019/20 Report entitled *CalFresh in Nevada County: Leaving Food (and Money) on the Table*. The responses to findings and recommendations are based on examination of official county records, review of the responses by the County Executive Officer, County Counsel and representatives or testimony of the Board of Supervisors and County staff. The responses contained herein also represent the Director of Nevada County Health and Human Services Agency (HHS) response as requested by the Grand Jury.

#### A. RESPONSES TO FINDINGS

F1: In 2017, the County was the eight lowest in California in its CalFresh PRI, which results in more food insecurity and the loss in economic benefits to the County.

##### Agree

**We agree that under-enrollment in CalFresh results in food insecurity and loss of economic benefit. We continue to strive for increased enrollment. While the PRI is an imperfect measure for comparisons between counties, it is useful to get a general sense for enrollment, and to measure a county's change in enrollment over time. Due to our focus on increasing enrollment, Nevada County's PRI ranking has increased over the past four years, The PRI in 2016 was 49% and had increased to 58% in 2018, the last year for which data was available at the time of this report.**

F2: The failure to enroll all eligible County CalFresh residents' results in direct loss of over ten million dollars and an even higher indirect loss to the County economy.

##### Disagree

**We are skeptical of the \$10 Million calculation, which uses an imprecise measure of enrollment (the PRI) and the flawed assumption that the unenrolled population would qualify for the same average benefit as the enrolled population. Additionally, 100% enrollment for all eligible residents**

**is not a reasonable or realistic goal. Residents often choose not to enroll despite being eligible. This can happen for a number of reasons, including being eligible for a very small benefit, or simply not wanting to be enrolled in government services. The focus should not be on 100% enrollment, but rather focusing on those who don't apply because they are unaware of their eligibility for the program, or because of the stigma associated with the program. Nevada County has put efforts to destigmatizing this program and outreaching to as many eligible residents as possible while addressing several barriers aside from personal choice, such as lack of transportation and lack of internet access. Nevada County has significantly increased the economic contribution in 2018 by improving outreach activities and making changes in application processing.**

F3: Other counties have higher participation rates and good outreach programs. They may provide helpful models for the County to use to improve local CalFresh participation.

**Agree**

F4: Other counties are employing newer technology to assist in their outreach strategies, including text messaging, e-mail solicitation and prepopulated forms to all Medi-Cal recipients. Some also use IVRS systems, interactive call centers and electronic signatures to improve the customer experience.

**Agree**

**Nevada County utilizes an Interactive Voice Response System (IVRS), text messaging and electronic signatures. The IVRS is available 24 hours per day to our customers. Many CalFresh customers have opted into active C4Yourself accounts which provides IVRS access and many others have opted into texting capabilities. Texting sends reminder notifications to customers when reports, verifications and interviews are due to avoid disruption of benefits. The County also allows phone applications to be completed via electronic signatures.**

F5: The County's 20-year-old telephone system used by the HHSA is not configured properly, functions poorly, and is not attended to regularly. It limits and discourages access.

**Agree**

**The County is in process of identifying and implementing a new telephone system, and Social Services staff have been involved in the process to ensure that the new system accommodates the needs of CalFresh and other Social Services programs.**

F6: The lack of a one-on-one case management system and use of group rather than individual interviews negatively impacted the application process.

### **Disagree**

**In 2014 during the implementation of the Affordable Care Act, caseload counts skyrocketed statewide, causing a significant impact on eligibility staff and program timelines. In response, the State strongly encouraged counties to adopt a team-based model for eligibility case management. After thorough consideration, including a review of team-based models in Yuba, Sutter, and Tehama Counties, Nevada County adopted a department wide strategy to more efficiently meet the needs of the customers by streamlining processes. Since implementing the team-based model the County's PRI standing amongst other counties has significantly and consistently improved.**

**The Department of Social Services also implemented a group interview/education orientation process for CalFresh applications as a pilot program. The program was implemented by one team to expedite customer service and reduce customer wait time. This pilot program has ended and individual CalFresh application interviews were reestablished again effective February 24, 2020. All interviews are currently being done individually.**

F7: The County CalFresh team has not been staffed to its number of budgeted positions. In this budget year, three Eligibility Worker positions and one Office Assistant position have been eliminated. In addition, the active error rate in the application preparation was higher than many counties and the County is out of compliance (and well below statewide averages) with 30-day and three day expedited applications. All of these result in delayed benefits for recipients.

### **Disagree**

**These positions were added to address the one-time surge in workload due to Affordable Care Act (ACA) implementation. The positions referenced were "limited term" positions and were never intended to be permanent additions to Social Services staffing. Subsequent to ACA implementation the workload stabilized, and the positions were phased out over multiple years, as originally planned.**

**The error rate information referenced in the report reflects a cumulative total for 39 counties. Nevada County's error rate was 0% for the time period reviewed, significantly below the 8.25% state average. Nevada County was awarded a Certificate of Excellence by the California Department of Social Services CalFresh branch for having the least number of errors of any Small County during the FY 2019 Management Evaluation of Case Reviews. Timely processing of 30-day and three day expedited applications is an area of focus for the County.**

F8: Nearby counties require their CalFresh employees to attend community events, which increases the visibility of the program and lowering the perceived stigma of assistance programs. The County has an opportunity to participate in many more community events.

**Agree**

F9: HHS outreach data makes it difficult to evaluate the performance success of outreach funds paid to other entities.

**Disagree**

**The County has internal tracking systems and effective relationships with CalFresh contractors for evaluating outcomes.**

F10, F11, F12, and F13:

**No responses have been provided for these findings as requested, as the report did not include F10, F11, F12, and F13.**

R1: The County should set an interim goal to increase CalFresh rates to the statewide PRI average of 71.8% by the end of FY 2021.

**The recommendation requires further analysis, which is estimated to be completed by 12/31/2020.**

**The County agrees that it is our goal to increase our CalFresh Participation Rate. The past two years of data in this area shows a successful upward trend from 49% in 2016 to 58% in 2018. Increasing our enrollment is a continual focus of our Department. We are in the process of analyzing internal data trends and gathering information from several other counties in order to determine an appropriate and reasonable target and timeline for increasing our enrollment rates. While the statewide average may be an appropriate target, factors such as the average age of the population in Nevada County,**

**the number of Spanish speakers, and the rural setting are all factors that impact the applicability of the PRI (which is based on Statewide demographics) to our county. While the PRI is imperfect for comparing counties to each other or to the State average, it can be an effective tool to measure changes in enrollment over time. Our target may be higher or lower than the State average and requires further analysis.**

R2: The County should review operations of like counties, identifying practices that can be used to increase CalFresh participation rates.

**The recommendation has been implemented.**

**We have reached out to counterparts in Tehama, Sutter, Placer, Sacramento, Stanislaus and El Dorado Counties to identify practices that may increase our participation rates. This includes review of California Department of Social Services reports to identify other counties who have high enrollment rates and reaching out to appropriate staff and State consultants for those counties to identify promising practices and innovative solutions.**

R3: The County should appoint a task force including community stakeholders, municipalities, and local businesses to provide recommendations to increase participation rates in CalFresh.

**The recommendation will not be implemented because it is not warranted.**

**The Department will continue to strategize with community partners, contractors, and other stakeholders to increase participation rates.**

R4: The County should set up and follow new protocols regarding the telephone system making sure that all the features (e.g. Spanish option and voicemail) are working all the time.

**This recommendation will be implemented by January 2021.**

**The Department worked closely with the County IGS Department to select a new phone system with greater capacity to serve customers and the ability to provide data on call volume, wait time, and ease of access. The new phone system will be installed in late 2020 or early 2021. In the meantime, the department is working with the IGS department to improve functionality of the current system, including adding Spanish language prompts.**

R5: The County should add IVRS capabilities to its communication system and should make sure that during initial inquiries a live person can be reached.

**The recommendation requires further analysis, which is estimated to be completed by 12/31/2020.**

**IVRS is currently utilized by the County. Nevada County's Interactive Voice Response System is available 24 hours per day to our customers. The County will explore ways to encourage and increase utilization of the IVRS and texting systems. We are also working to streamline phone processes by providing additional staff to assist with customer questions. Our analysis will be complete and a plan to improve responses to initial inquiries will be implemented by December 31, 2020.**

R6: The County should adopt a system that allows the same Eligibility Worker to follow individual clients all the way through the process.

**The recommendation will not be implemented because it is not warranted.**

**The County does not agree that the lack of a one-on-one case management system is negatively impacting the application process and other services. Since implementing the team-based model the County's PRI percentage has significantly improved. The State has encouraged the team-based approach in all counties and has assisted us in better meeting the needs of the customers by streamlining operations, maximizing resources, providing an equitable workload distribution, reducing interruptions, and promoting teamwork.**

R7: The County should conduct individual client interviews instead of group sessions.

**This recommendation has been implemented.**

**The group interview pilot program for CalFresh applications ended and individual CalFresh application interviews were reestablished effective February 24, 2020. All interviews are currently being done individually.**

R8: The County should fill all budgeted positions in HHS.

**This recommendation has been implemented.**

**In a large agency such as Health and Human Services Agency, there are always positions becoming vacant and being filled. There are a variety of reasons that a position may remain vacant for longer than normal, including availability of qualified applicants, budgetary constraints, and innumerable other scenarios. The County and HHS will fill vacant positions at our discretion.**

**In addition, as part of the reorganization of the Eligibility and Employment Division, we have created a Training Team that will help facilitate more rapid and effective onboarding and training of new staff.**

R9: The County should identify why the current applications are out of compliance with State response expectations and do whatever is necessary to reestablish and maintain compliance.

**This recommendation has been implemented.**

**The current reorganization will help support additional staff being trained in the application functions to meet these state mandates and a lead worker is now reviewing the pending application list on a regular basis to ensure compliance, and to identify and address error trends. We are continuing to monitor and explore compliance data in order to discover and implement opportunities for improvement and actively working to reduce delays.**

R10: The County should use its current staffing to perform outreach functions at more public events and locations (e.g., farmers markets, senior centers and housing, etc.) in the County.

**This recommendation requires additional analysis, which is estimated to be completed by 12/31/2020.**

**We agree with the need for increased outreach and share the Grand Jury's goal of ensuring the maximum possible benefits are distributed to eligible citizens, but we do not yet know if this strategy is an effective way of accomplishing that goal. The department will explore ways to increase program participation by reviewing regional trends and enrollment rates within our county, considering targeted outreach, and by seeking input from community partners and successful counties to explore ideas, strategies, and practices that will increase our CalFresh participation rates. The current pandemic is impacting our ability to participate in community functions and events, and we are exploring creative ideas to promote CalFresh in this new environment.**

R11: The County should review its outreach contracts with community organizations to determine if there are opportunities to improve coordination, training, metrics, and to achieve better results.

**The recommendation has been implemented.**

**The Department has reviewed current CalFresh contracts to identify areas where improvements can be made and implemented contract changes including more specific deliverables around generating new applications, retaining benefits, addressing barriers to program participation and increasing participation in online platforms.**

R12: The County should explore and adopt technology used by other counties such as electronic signature by phone or e-mail, IVRS, text messaging reminders, and video conferencing.

**This recommendation requires further analysis, which is estimated to be completed by 12/31/2020.**

**We currently utilize electronic signature, IVR, and texting. Nevada County employs the use of an Interactive Voice Response System (IVRS) that is available 24 hours per day to our customers. Texting sends reminder notifications to customers when reports, verifications and interviews are due to avoid disruption of benefits. The County allows phone applications to be completed via electronic signatures and is extensively using video conferencing. The Department is researching ways to more effectively utilize and encourage customer participation in the use of other technologies through our inquiries to other counties with higher PRI rates.**