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Making it Easier for Residents to Apply for Social Services Recommendations to the New Mayor and DC Council

District of Columbia policymakers have built a strong safety net for low-income families and individuals. Nowhere is this commitment better demonstrated than in the District's expansion of eligibility for public health insurance and Supplemental Nutritional Assistance Program (SNAP, formerly known as food stamps). Through these actions, the District has one of the lowest percentages of uninsured children and adults in the country and has greatly reduced food insecurity.

The Affordable Care Act provided an opportunity to further expand access to health insurance and to replace the District's outdated computer system for safety net benefits, including Medicaid. However, staffing and technological challenges during the implementation have led to service delivery breakdowns and have denied or delayed benefits for some residents. Several stories of clients impacted by these breakdowns, and propose solutions to these problems, were highlighted in a 2014 report by the Legal Aid Society of the District of Columbia and DC Fiscal Policy Institute, *Closing the Gap Between Policy and Reality: Preventing Denials and Terminations of Public Benefits in the District of Columbia*.

Services have improved since the release of that report, and the District is collaborating with advocates to better inform and serve clients. However, further improvement in service delivery is needed to strengthen the safety net as DC continues to implement health reform and a new computer system.

Background: Service Breakdowns Lead to Benefit Disruptions. As we noted, in *Closing the Gap*, public benefits program administration has always been difficult, and implementation of the Affordable Care Act (ACA) has proven to be a herculean task. Over the course of the last two years, the District government has had to totally overhaul its Medicaid policies and procedures, and the information technology infrastructure for its public benefits.

The scope of the overhaul has put strain on existing resources and adversely affected DC residents. Frontline service delivery and case processing have suffered due to inadequate staffing and insufficient space at social services centers, technological glitches and inadequate communications from the agencies tasked by the District of Columbia to implement the ACA – Health Benefits Exchange Authority (Exchange), the Economic Security Administration (ESA) of the District Department of Human Services and the District Department of Health Care Finance (DHCF).¹

¹ Closing the Gap, pg. 1.

In early 2014, many clients experienced problems accessing benefits, including long wait times at service centers; inaccurate or incomplete information provided by agency staff (coupled with a lack of information on policies and procedures); being sent from service center to service center in violation of the “No Wrong Door” principle of the ACA; and application and other documents that were lost.²

Services Have Been Improved but Further Progress Needed. There have been operational improvements since the report’s release. The agencies have hired additional staff and are continuing to upgrade computer systems. The District has increased office hours and created off-site self-help locations. Finally, the agencies responsible for administering public benefit programs in the District (ESA and DHCF) hold regular meetings with advocates to hear service concerns and provide information on developments that would impact clients, and they now disseminate more information produced in collaboration with advocates about program changes. These efforts have allowed both the agencies and advocates to better serve clients.

Policy Recommendations. The following recommendations will support further progress in fulfilling the mission to ensure access to health insurance and other benefits among DC residents.³

- ❖ ***The administration should set goals for prompt and high quality assistance for residents seeking public benefits.*** The District should take steps to ensure that individuals don’t have to wait in long lines for hours and that residents receive high-quality and accurate customer service. This can be accomplished through setting service delivery performance measures, regular site visits and a robust secret shopper program.
- ❖ ***The District should provide sufficient agency staffing and make technological improvements.*** The District should maintain frontline staffing at services centers as it makes technological improvements. It will be a while before the technology is fully operational, and, even then many residents will need to interact with agency staff because of lack of familiarity or comfort with the technology. In addition to front-line staff, agencies need sufficient policy staff to promulgate formal policies (including regulations and agency guidance) and communications staff to update agency websites and disseminate information widely.
- ❖ ***District agencies must promulgate regulations and guidance (and put these materials out for public comment).*** It is very important to have regulations and guidance to govern benefit programs. Yet many aspects of benefit programs continue to operate without regulations or written policies and procedures. For example, DHS has not updated the policy manual for public assistance in several years. The public should have a chance to review and respond to the government’s choices in implementing these programs, and such input is required under the District of Columbia Administrative Procedures Act.

² Ibid., 5-10.

³ Many of these recommendations build on the ones presented in *Closing the Gap*. Please see pages 12 through 17 for a complete list of recommendations.

- ❖ ***The District should continue to improve methods of disseminating information to help residents understand the public benefits for which they may qualify.*** The District is doing a better job of information dissemination, such as providing in-depth materials for experienced advocates and simpler materials for individuals who have less experience. The District can make further improvements by providing notice in advance of policy or procedural changes, since such notices often go out just as a change is taking place or even afterwards. The District also should seek review from advocates to help improve the clarity of messaging.

- ❖ ***District agencies should continue to collaborate with advocates.*** While ESA and DHCF have been more open with advocates about their decisions and processes, there still appears to be reluctance to engage with advocates. For example, DHCF convened working groups to receive feedback on its notices, but then had no follow-up to discuss the recommendations and did not share final versions of the notices. Greater collaboration by District agencies with advocates can help agencies meet their goals and serve clients better.