

**Testimony for Public Oversight Hearing on the Performance of the Economic Security
Administration of the Department of Human Services**

**District of Columbia Council Committee on Health and Human Services
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On behalf of the DC Fiscal Policy Institute¹ and the Legal Aid Society of the District of Columbia², we submit this testimony to the Committee on Health and Human Services to express our concern that scores of District residents are unable to access and retain crucial safety net benefits due to exceedingly long lines at many Economic Security Administration (ESA) Service Centers and systemic errors by ESA staff.

In May 2014, our organizations authored a report entitled *Closing the Gap Between Policy and Reality: Preventing Denials and Terminations of Public Benefits in the District of Columbia*. This report highlighted how staffing and technological challenges faced by ESA during implementation of the Affordable Care Act has led to service delivery breakdowns and improper benefits terminations and denials for many District residents. Since that time, ESA has made significant efforts to improve service delivery by hiring additional staff and working to expand space at some of its Service Centers. In addition, ESA has been actively engaged with advocates, holding monthly business improvement meetings to discuss implementation issues and policy challenges. We hope to broaden this partnership with the Bowser Administration (and with the input of this Committee) and to continue working together to ensure high quality service delivery to consumers.

Despite these advancements, we remain deeply concerned that far too many vulnerable District residents are unable to access the benefits upon which they depend due to systemic problems plaguing ESA service delivery. In an effort to better understand these problems, our two organizations—as well as Whitman-Walker Health, Bread for the City, Legal Counsel for the Elderly, and Terris, Pravlik & Millian LLP—have visited three ESA Service Centers—those at Taylor Street NW, H Street NE, and Anacostia—at least one morning per week throughout February of this year. During these visits, we spoke with individuals standing in line and collected data concerning wait times. Over our twelve visits—four to Taylor Street, five to H Street, and three to Anacostia—we observed approximately 550 people in line and interviewed 309 of these individuals.

¹ DC Fiscal Policy Institute engages in research and public education on the fiscal and economic health of the District of Columbia, with a particular emphasis on policies that affect low- and moderate-income residents.

² The Legal Aid Society was formed in 1932 to “provide legal aid and counsel to indigent persons in civil law matters and to encourage measures by which the law may better protect and serve their needs.” Over the last 80 plus years, tens of thousands of the District’s neediest residents have been served by Legal Aid staff and volunteers. Legal Aid has been practicing in the area of public benefits for a number of years, representing clients with TANF, SNAP, and Medicaid cases.

In the testimony that follows, we highlight the three most significant observations from our Service Center visits:

- First, consumers confront very long lines at Service Centers, routinely line up before 6 a.m., and report being turned away by ESA staff due to the Centers having reached capacity.
- Second, consumers report being told they are at “the wrong Service Center” and that they must go elsewhere to receive services, which violates ESA’s policy that there be “no wrong door” for obtaining assistance.
- Third, consumers often make return trips to Service Centers to correct improper benefits terminations and denials caused by ESA failing to process their paperwork.

I. Consumers Routinely Line Up Outside Service Centers Before 6 A.M. and Report Being Turned Away By ESA Staff Due to Capacity Problems.

The most striking observation from our visits was the sheer number of people in line waiting for the Service Centers to open and how early they began lining up.

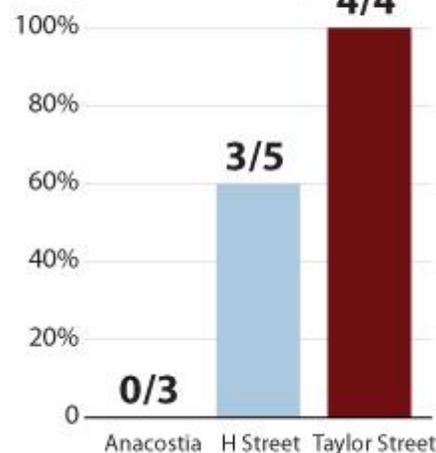
Although ESA Service Centers open at 8:15 a.m., the lines prior to opening numbered 50 or more on a majority of our visits. On two visits, the line numbered 75 or more prior to opening.

The problem of line length was particularly acute at the H Street and Taylor Street Service Centers where, on all but two visits, more than 50 people were in line prior to opening. Indeed, on one morning at Taylor Street (February 27), the line prior to opening totaled 100 people. A picture of this line is included in Appendix A.

Many individuals reported arriving between 4 a.m. and 6 a.m. and waiting for several hours outside until opening. **Over a third** of those we interviewed across all three Service Centers reported arriving between the hours of 4 a.m. and 6 a.m. At Taylor Street, the **number was a striking 54%**. On several of these mornings, the temperatures were below freezing, and many people in the line were elderly, disabled, or accompanied by infants and children.

Many beneficiaries reported having been turned away in the past due to problems with capacity at Service Centers. They reported that, on other occasions, they had waited in line for hours only to be told mid-morning that the Service Center

SERVICE CENTER VISITS WITH 50 OR MORE PEOPLE WAITING IN LINE
(Proportion of Visits)

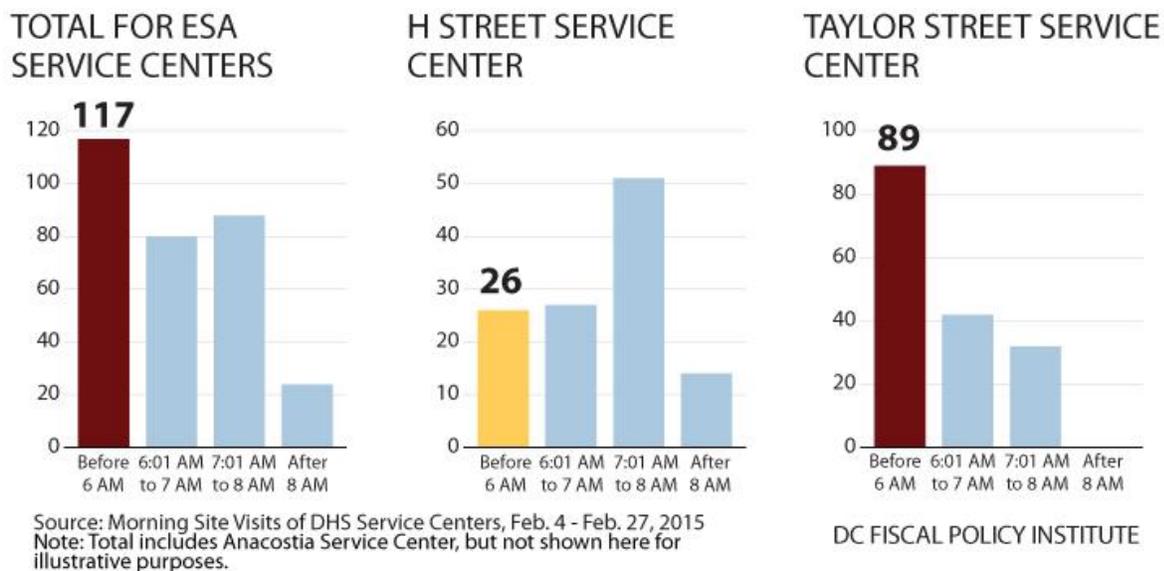


Source: Morning Site Visits of DHS Service Centers, Feb. 4 - Feb. 27, 2015

was not taking any more cases. None of these individuals reported being offered return appointments; instead, they were simply told to try again another day. Indeed, during just one visit to the H Street Service Center on February 12, four separate beneficiaries reported that they were back for a second time after having been turned away due to capacity problems on a prior visit within the last week.

ARRIVAL TIMES OF ESA CLIENTS

About 38 percent of clients report arriving at service centers before 6 am to ensure being seen by ESA staff. Clients report lining up as early as 4 am.



The lengthy wait times at Service Centers make it nearly impossible for individuals with jobs to dedicate the time necessary to apply or recertify for benefits. For example, one woman we spoke with at the Taylor Street Service Center on February 10 explained that her Alliance health coverage had expired in December because she had been unable to take a day off work to wait in line to recertify. After going without health insurance for over a month, she had come early to the Service Center in the hopes of reapplying for Alliance and making it to her job by 11 a.m. Although she was towards the front of the line, her case had still not been called by the time she needed to leave for work. She asked the front desk if she could schedule an appointment for another day but was told this was not allowed. If she left, they explained, she would have to stand in line all over again another day. She was thus forced to wait until her case was finally called and ended up arriving late to work.

We recognize that ESA faces challenges in its ability to efficiently serve large numbers of beneficiaries due to staffing constraints and limited space in many Service Centers. We also realize that the agency has responded to these problems by hiring more staff and working to expand Service Center space. However, the deployment of these staff and the completion of

Service Center upgrades have yet to take effect, causing consumers to suffer real hardship in the present. Given the slow pace of these reforms, the agency must adopt immediate measures to address the problem of long wait times and limited Service Center capacity.

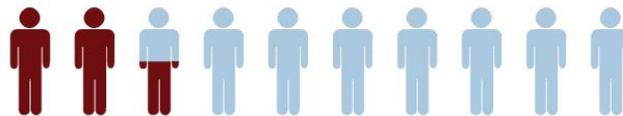
We propose the following policy reforms and operational changes to both significantly reduce the flow of people coming into Service Centers and more efficiently serve those who do arrive:

Reform the Alliance recertification process. A significant percentage of individuals we interviewed—27% across all three Service Centers—were there for issues pertaining to Alliance. At the Taylor Street Service Center, almost half (40%) of individuals interviewed were there to address their Alliance coverage. Yet, Alliance only has about 15,000 beneficiaries, a small portion of all residents with public assistance.

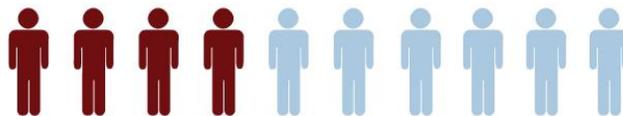
REASON FOR SERVICE CENTER VISIT

More than 1 in 4 respondents were at the service center for visits related to the Health Care Alliance. However, Alliance only accounts for a small number (15,000) of public assistance beneficiaries.

ALLIANCE ACCOUNTS FOR 27 PERCENT OF ALL REPORTED VISIT VOLUME



ALLIANCE ACCOUNTS FOR 40 PERCENT OF REPORTED VISIT VOLUME AT TAYLOR STREET



Source: Morning Site Visits of DHS Service Centers, Feb. 4 - Feb. 27, 2015

DC FISCAL POLICY INSTITUTE

Eliminating the requirement of a face-to-face interview for Alliance recertifications or shifting to a one-year (rather than six-month) timeframe would thus significantly reduce line lengths, particularly at the Taylor Street Service Center. The District could also divert some of the Alliance-related traffic away from Service Centers by permitting community health centers or other community partners to conduct the face-to-face interview. Advocates made these recommendations to the District government several months ago, but to date no action has been taken to reform the recertification process.

Improve the quality and responsiveness of ESA’s telephone customer service line.

Some individuals we interviewed had come to Service Centers simply seeking information about their cases after having tried unsuccessfully to speak with an ESA representative over the phone. For example, one woman we spoke with at the Taylor Street Service Center on February 12 had tried three times to call ESA to find out why the Medicaid cards for her newborn and her infant daughter had suddenly stopped working. After she was unable to get through to a live representative during any of her three phone calls, she came to the Service Center at 4:30 a.m. to find out why her children’s health insurance was not active.

Adopt operational changes to more efficiently serve those who do arrive. We recommend that ESA create separate “Express Lanes” to more quickly shepherd through the line those people who need only drop off documents or conduct face-to-face interviews.

ESA should also offer some appointments to beneficiaries coming to conduct routine recertifications. Although ESA currently schedules appointments for food stamps recertifications, the agency specifies only the date and not the time of the appointment, requiring

beneficiaries to set aside the whole day for recertification. One beneficiary told us she had taken the whole day off work to complete her food stamps recertification because she had no way of knowing when she would be seen.

In addition to providing specific appointments for those conducting routine recertifications, next-day appointments should also be offered to those individuals who have waited in line but cannot be seen for capacity reasons. It is only fair that individuals who have already spent several hours attempting to apply or recertify for benefits be offered return appointments for a specific date and time, rather than simply being told to try their luck again another day.

II. Consumers Report Being Told They Are at the “Wrong Service Center” and That They Must Go Elsewhere to Receive Assistance.

ESA is committed to a “no wrong door” policy, meaning that applicants and beneficiaries should be able to receive assistance at any Service Center and should never be told they are in the wrong place.

However, through our visits to the Service Centers, we have seen that this policy is not consistently followed in practice. A few people we interviewed told us that they had previously been turned away for being “at the wrong Service Center” and were now back in line for a second or third time at a different Service Center.

For example:

- One man in line at the H Street Service Center on February 4th told us this was his third attempt to recertify for food stamps. He had previously gone to the Anacostia Service Center and been told to return with additional documents. However, when he returned with these documents, he was told he must instead go to the H Street Service Center to be seen. He arrived at H Street on February 4th hoping his third attempt to recertify would finally be successful.
- One man we spoke with at the Taylor Street Service Center on February 10 had come at 6:00 a.m. after being turned away from medical care due to his Medicaid being inactive. After waiting in line for several hours, he was told he needed to go to the H Street Service Center instead. When we followed up with this individual days later, he told us that he had not been able to find the time to wait in line at a second Service Center and still had no Medicaid. Eventually, his Medicaid was restored.
- One man we spoke with at H Street on February 27 reported that he was trying for a second time to apply for QMB after having previously been turned away from Taylor Street. He told us that the H Street staff allowed him to apply for QMB on this second visit but told him that he should have applied at Taylor Street all along.

A variation of the “no wrong door” problem is the lack of coordination or sharing of information across Service Centers when doing so would facilitate a beneficiaries’ access to

benefits. During a visit to Taylor Street on February 10, we encountered one man who was waiting in line for expedited food stamps—benefits reserved for those with no or very little income. He told us that, after waiting for several hours at Taylor Street the day before, he had been approved for expedited food stamps and told to go to the H Street Service Center to pick up his EBT card. He paid to take a bus to the H Street Service Center but, after waiting in line there, was told that there was no record of his approval. Rather than offering to contact Taylor Street to resolve the situation, the ESA representative turned him away and advised him to return to Taylor Street. He waited in line for a second time at Taylor Street on February 10, only to be sent back to H Street a second time to pick up his EBT card. Because he had spent the last of his money on bus fare the day prior, he was forced to walk two hours to H Street and two hours back in the bitter cold to finally obtain his card.

In sum, it is clear that ESA’s front-line staff is not consistently following the agency’s “no wrong door” policy. **In addition to the training that ESA provides to staff, we recommend that the agency adopt oversight mechanisms to ensure that staff provide correct information to beneficiaries and rectify problems when errors are made. Such oversight could take the form of regular site visits by upper-level staff and a robust “secret shopper” program to monitor the reality on the ground.**

Such reforms are necessary to alleviate the very real burdens that low-income beneficiaries face when they are told to travel from Service Center to Service Center to receive assistance. These individuals must not only wait in line for several hours at multiple Service Centers but must also use their limited financial resources to pay for transportation across the city. Given the long wait times involved in visiting a Service Center and the real hardship that transportation imposes for disabled and low-income individuals, it is unacceptable that ESA staff would ask individuals who have already waited in line for several hours to travel to or wait at a *second* Service Center to receive assistance.

III. Consumers Make Return Trips to Service Centers to Correct Improper Benefits Terminations and Denials Caused by ESA Failing to Process Their Paperwork.

Our visits confirmed what has been a longstanding problem with ESA: the failure to consistently track or timely process documents, particularly those that are submitted by fax or mail. For example, one woman came to the Taylor Street Service Center at 4:30 a.m. on February 12 to deliver documents that had previously been faxed to ESA but never processed, resulting in a lower monthly food stamps amount. Another woman reported that her food stamps had been cut off in February despite the fact that she filled out her recertification paperwork in person at the Taylor Street Service Center in December. As a result, she returned to Taylor Street on February 12 and stood in line again to fill out the required paperwork for a second time.

These document processing problems also create burdens for the agency itself due to the number of beneficiaries who come to Service Centers seeking to resubmit documents that were never processed.

We spoke with 18 people (6% of the total number interviewed) who reported that they had come to a Service Center simply to drop off documents that they had already tried

unsuccessfully to submit by other means. Although this figure appears small, decreasing the line lengths across all Service Centers by 6% would conserve agency resources. In addition, improving the reliability of ESA's document processing procedures would likely lead to further line length decreases by increasing beneficiaries' confidence in sending documents by mail or fax.

We recommend that ESA create a separate "Express Lane" for individuals dropping off documents and assign dedicated staff whose job it is to immediately scan and process these documents, reducing the potential for future delay and error. Because ESA has never made available to advocates its document handling procedures, it is difficult to know exactly where the breakdown in document processing occurs. Our understanding is that ESA staff currently collect documents from beneficiaries but do not immediately scan them into the system, increasing the risk that such documents will be misplaced or never linked to the correct account.

Without an overhaul in the agency's procedures for processing documents, beneficiaries will continue to be subject to improper terminations and denials and the Service Centers will continue to strain under the weight of consumers coming to correct these very errors.

IV. Conclusion

Our Service Center visits have illustrated the very real obstacles that vulnerable District residents face when they try to access the benefits and health coverage upon which they and their families depend.

Many individuals wake up before dawn to stand in line for hours outside Service Centers. Despite these waits, beneficiaries report being turned away due to the Service Centers having reached capacity. Even when beneficiaries are able to battle these lines and be seen, they still risk being told they are in the "wrong" place and being forced to travel to and wait at a second Service Center to receive assistance. Many of them must also return again to correct improper terminations and denials resulting from ESA's failure to process their paperwork. And many confront these obstacles while struggling to manage disabilities, raise children, or maintain their employment.

While we know that ESA is working to improve its services, these are immediate problems that require immediate action. We thank the Committee for considering the reforms we have proposed, and we hope to partner with both ESA and the Bowser Administration to advance our mutual goal of ensuring high quality service delivery to consumers.

Appendix A:

Line Outside Taylor Street NW Service Center (Feb. 27, 2015 at 7:45 a.m.)

