Human Resources Administration
Department of Homeless Services
Department of Social Services

EXECUTIVE SUMMARY

In collaboration with the New York City Council, the New York City Department of Social Services (DSS or Department) worked to pass legislation (LL 169 of 2019) that requires the Department to conduct an audit.

The audit will focus on operations, policies, and procedures at the New York City Human Resources Administration (HRA or Agency) Job Centers and Supplemental Nutrition Assistance Program (SNAP) Centers, with the goal of increasing operational efficiency at such Centers.

AGENCY MISSION

Meeting Clients Where They Are

The Human Resources Administration/Department of Social Services (HRA/DSS) enhances the quality of life for all New Yorkers by providing temporary help to eligible individuals and families with social service and economic needs in order to assist them in leading independent lives. These goals are accomplished through the effective administration of a broad range of social welfare programs and services.

HRA/DSS provides economic support and serves families and individuals through the administration of major benefit programs including Cash Assistance, Supplemental Nutritional Assistance Program benefits (food stamps), Medicaid, and Child Support Services. HRA also provides homelessness prevention, educational, vocational and employment services, assistance for persons with disabilities, services for immigrants, civil legal aid and disaster relief. For the most vulnerable, it provides HIV/AIDS Services, Adult Protective Services, Home Care and programs for survivors of domestic violence.

The report submitted pursuant to LL169 of 2019 provides for a comprehensive plan to address operational efficiencies at Job and SNAP Centers.

The report includes data responsive to 17 metrics prescribed in LL169 of 2019, including comprehensive responses to advocate input.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Agency. The audit shall include an analysis of data from the prior calendar year concerning:

1. *The current wait times at each Job Center and SNAP Center for each ticket regardless of ticket type;*

2. *The total current wait times at each Job Center and SNAP Center for each visitor combining all ticket types;*
3. *The current wait times at each Job Center and SNAP Center for each ticket, disaggregated by the type of ticket by queue;*
4. *The total time a visitor spends at each Job Center and SNAP Center beginning when a ticket is issued and ending when the visitor's last ticket of the day is closed;*
5. *The number of visitors who are issued more than one ticket at Job Centers or SNAP Centers on the same day;*
6. *For each Job Center and SNAP Center, the number of cases and persons served and the number of applications received, disaggregated by whether such cases or applications are recurring or non-recurring;*
7. *For each Job Center and SNAP Center, the average case size, the number of adults and children served by the Center's caseload and the percentage of applications accepted;*
8. *The number of recertifications scheduled at each Job Center and SNAP Center;*
9. *The number of staff assigned to each Job Center and SNAP Center, disaggregated by title;*
10. *The number of SNAP applications submitted through ACCESS HRA accounts or any similar successor technology;*
11. *The number of SNAP recertifications submitted through ACCESS HRA accounts or any similar successor technology;*
12. *The number of on-demand telephone calls completed;*
13. *The efficiency and ease of use of the Department's phone lines;*
14. *Visitors' access to technology in Job Centers and SNAP Centers;*
15. *Monthly reports submitted to the Commissioner of Social Services pursuant to subdivision c of section 21-142.2;*
16. *Issues regarding operations, policies, and procedures at Job Centers and SNAP Centers raised by the organizations that have experience working with visitors; and*
17. *Recommendations to address issues regarding operations, policies and procedures at Job Centers and SNAP Centers received from the organizations that have experience working with visitors.*

The Department welcomes the opportunity to present our report outlining our continuing initiatives to enhance client services and our long-term client services goals pursuant to this Local Law.

The Department believes in moving away from a program-focused (each program operates separately) service-delivery approach that requires clients to go to specific offices for help to a more client-centric, "no wrong door" approach. Utilizing this "no wrong door approach," the agency seeks to maximize the use of technology wherever possible as well as co-locating with other agencies and community-based organizations (CBOs) to leverage community-based outreach and resources to advance the Agency's mission of fighting poverty and income inequality by providing New Yorkers in need with essential benefits and services.

In 2014, under Commissioner Banks the agency developed an agency/advocate workgroup model to establish a means of communication among agency leadership and clients and advocates. The workgroups were created based upon program areas, benefit types, or populations of clients and advocates, allowing us to focus on changes or improvements within each area. The workgroups generally meet monthly and stakeholders from across the agency participate in the workgroups, including various program or operational managers as well as senior and executive level staff.

These workgroups established forums to meet with advocates and clients to discuss issues experienced by clients and those organizations who advocate daily on their behalf. Workgroups also provide a venue to hear suggestions regarding operational processes and policies to better serve clients as well as increasing operational efficiencies. We work collaboratively with advocates and clients to find ways to address the issues raised taking into consideration federal and state laws, regulations, and policies as well as budgetary impacts. The feedback received in these workgroups creates an additional metric against which the agency assesses service delivery, and our policies and procedures as we meet the needs of our clients.

From these workgroups, we have developed new policies, procedures, forms, and trainings, as well as revised existing policies, procedures, forms, and trainings. We have developed ideas around regulatory changes and developed new operational functions to assist clients to gain greater access to those benefits for which they are eligible. These workgroups have also been a means by which to avoid litigation and reduce the number of administrative fair hearings.

A full list of workgroups and a brief description can be found in Appendix A

The New York City Department of Social Services/Human Resources Administration

The Department of Social Services (DSS) is comprised of the administrative units of the NYC Human Resources Administration (HRA) and the Department of Homeless Services (DHS). DSS/HRA is the largest local social services agency in the country, with more than 14,000 staff and an operating budget of $9.7 billion in 2019, helping over 3 million New Yorkers through the administration of a broad range of programs to address poverty and income inequality and prevent homelessness, including:

- Education, training and job placement services to assist low-income New Yorkers in obtaining employment
- Cash Assistance (CA) to meet basic human needs
- Rental arrears and assistance to prevent homelessness
- Federal Supplemental Nutrition Assistance Program (SNAP) benefits
- Emergency food assistance to food pantries and community kitchens to fight hunger
- Access to public health insurance financed through the State Medicaid Program
- Services for survivors of domestic violence
- Services for New Yorkers with HIV/AIDS
- Services for children, including child care and child support services
- Protective services for adults unable to care for themselves
- Home care for seniors and individuals with disabilities
- Home energy assistance

DSS/HRA has worked to reform social services policies that were in place over the past several decades and enhance access to benefits through a broad range of continuing initiatives, including:

- We eliminated and replaced the Work Experience Program (WEP).
- We successfully advocated for a change in State law to permit clients to count approved coursework at four-year college programs towards federal and State Cash Assistance work requirements and obtain college degrees to greatly enhance their ability to earn a living wage.
- We successfully implemented a pre-conciliation, conciliation and pre-fair hearing case review and conference process to avoid work requirement-related sanctions and advocated for a change in State law to give clients in New York City an opportunity to "cure" a work requirement violation at any time and avert a durational sanction. We also successfully advocated for a reduced State sanction period for SNAP benefits.
- We put in place new protocols to prevent unnecessary case closings and adverse actions against clients, and State fair hearing challenges by clients decreased by more than 54 percent.
- As a result of preventing unnecessary fair hearings, the City is no longer subject to a potential $10 million annual State financial penalty for such unnecessary hearings.
- We now make it easier for clients to continue their assistance if they submit required documentation within 30 days of a case closing and ensure that missing paperwork doesn't cause someone to lose their benefits.
- Homeless clients can now seek assistance at a Job Center in their home borough.
- Now all seniors can receive services at a Job Center in their home borough.
- In 2017, we implemented the Universal Receipt to provide an individual who completes a visit at a Job or SNAP Center with a document that indicates the nature and date of the visit.
    - A copy of this receipt is available on ACCESS HRA (AHRA) and this receipt process has been codified into local law as a result of legislation sponsored by Speaker Johnson.
- Clients can now submit Cash Assistance recertification questionnaires online, submit documents from a smartphone, and gain access to over 100 case-specific points of information for Cash Assistance and SNAP.
- We improved ACCESS HRA so that SNAP applications, recertifications, and periodic mailers can be submitted online, and documents can be submitted via our mobile app on a smartphone. In September 2019, SNAP clients submitted 90% of their applications online.
- We instituted On-Demand eligibility interviews for SNAP, and now SNAP eligibility interviews are conducted at the client's convenience by phone. In September 2019, 97% of application interviews and 86% of recertification interviews were held via telephone.
- We obtained State approval to increase the population eligible for Interactive Voice Response System (IVRS) which allows select SNAP households aged 55 and over to complete their recertification 24 hours per day, seven days per week.
- We created a Provider Portal, which enables community-based organizations to view a client's case record in order to help the client with document submission, various case inquiries, and application and recertification requirements.
- We began accepting a federal waiver, without which clients who are classified as Able-Bodied Adults Without Dependents (ABAWDs) were limited to SNAP benefits for only three out of 36 months if they did not work or could not find work for at least 80 hours a month in

areas of high unemployment. Unfortunately, the Trump Administration is implementing a rule to take this option away from NYC, but we have joined a lawsuit to stop this.

- We instituted a centralized rent arrears processing unit to ensure that rent arrears payments are issued by the required due date.
- We streamlined the system for making New York City Housing Authority (NYCHA) rent payments electronically, rather than the old practice of paper checks – and we are developing a similar payment system for private landlords.
- We eliminated finger-imaging for Cash Assistance clients following successful advocacy to end this State requirement.

<u>AGENCY Report</u>

We have been focused on implementing a new era that enhances access to benefits to improve the client experience. At the center of these efforts is a self-directed service delivery model that restores agency to our clients and mirrors such tools common to everyday life found at banks, public transit and supermarkets. In the same way that paper food stamps were replaced with electronic benefits transfer (EBT) cards in the 90s, our modernization efforts are bringing welcomed changes to the way in which benefits are administered. EBT cards were initially implemented as a means of fraud reduction, however they proved important in eliminating inconvenient processes the paper food stamp system required. This change also provided an electronic record of each transaction for both clients and program administrators and allowed for different mechanisms of understanding data utilization, disbursement and benefits replacement. Fast forward and as of 2018, New Yorkers who apply for this critical entitlement are able to conduct their business from start to finish in the comfort of their own home or at a trusted community-based site, without having to come into one of our offices.

HRA has been implementing an ambitious plan to use technology and a modern client-focused approach to fundamentally change the way core programs and services are accessed. On-line access to social services has started to become the norm throughout the country and the Affordable Care Act (ACA) shifted the model for States and localities to provide the largest of all the social service benefits – public health insurance – to online. In January of 2012, the New York City Council General Welfare Committee held a hearing to focus on long lines, overcrowding, and long wait times at HRA Job Centers and SNAP Centers. In 2014, we built on previous efforts to address this problem by investing in reforms to modernize the agency's technology systems, optimize operational efficiencies, and improve the overall client experience in our centers.

This set the stage for where the agency is today:

With federal and State approval, by removing real barriers to access and creating a self-directed service model, we are now able to permit SNAP applicants and clients to conduct a broad range of transactions with the Agency without the burden of having to physically come to an HRA office.

Now, using the lessons learned in modernizing access to SNAP through ACCESS HRA, we are applying those same principles to modernizing Cash Assistance for our clients to increase access to services without having to come to an HRA office.

We ground our reform efforts in the belief that access to benefits should be straightforward with no wrong door. When clients come to us, they can be facing a myriad of issues, and our goal is to provide them the necessary support, so they can get back on their feet.

We have begun to integrate technological improvements into our Cash Assistance (CA) program to improve the client experience in Job Centers in the way that we have done at SNAP Centers. For example, we have built out our Centers to include PC Banks and self-service scanners.

- The first SNAP PC Bank was opened in the Rockaways in 2013, following Hurricane Sandy. Today, there are PC Banks at all 16 SNAP home centers, this does not include S15 (SSI) and S61 (residential treatment), where clients do not have to come into the office to receive services.
- In April 2015, self-service scanners and check-in launched, and the SNAP online app and SNAP online recertification were launched
- In November 2015, the Mobile document upload pilot began
- In January 2016 SNAP on-demand recertification interview pilot went live
- In February 2017, AHRA e-notices went live
- In March 2017, the AHRA mobile app went live
- In July 2017, ACCESS HRA case details, payments, appointment, documents to return, the Cash Assistance online app, and Cash Assistance online recertification were launched
- In August 2017, the first CA PC Bank (co-located with SNAP) opened at the Rockaway and East End Job Centers
- In September 2017, the AHRA Provider Portal went live
- In November 2017, the AHRA SNAP Periodic Report went live
- In January 2019, AHRA became mobile responsive
- In March 2019, AHRA SNAP case changes and case closings requests went live
- In March 2019, AHRA Fair Fares fast track enrollment went live for SNAP and CA clients
- In July 2019, AHRA CA special grants requests for rent arrears and utility arrears went live
- And in Sept 2019, AHRA CA special grant requests for other special grants such as for moving to a new apartment, furniture allowance, restaurant allowance, adding a person to the budget, etc., went live.

In July of 2018, following State approval, we launched the Bronx Cash Assistance pilot, designed to enable individuals to apply for Cash Assistance through the ACCESS HRA online portal outside of our office locations. The pilot structure supports staff in 14 community-based organizations (CBOs) who work directly with clients to provide benefits enrollment assistance. Along with offering the Cash Assistance application at their offices, these CBOs also have a DSS Community Engagement Liaison assigned to them who provides support and assistance to their staff. Our goal with this pilot is to demonstrate the value of accepting Cash Assistance applications online so that we can obtain approval to modernize our systems and realize similar improvements for Cash Assistance clients as we have with SNAP.

We continue to work with the State to obtain necessary waivers to continue our work to transform our Cash Assistance application and recertification processes to mirror what we’ve accomplished with SNAP so that clients will be able to conduct their business without the need to come to a physical Center.

New and Improved Technology

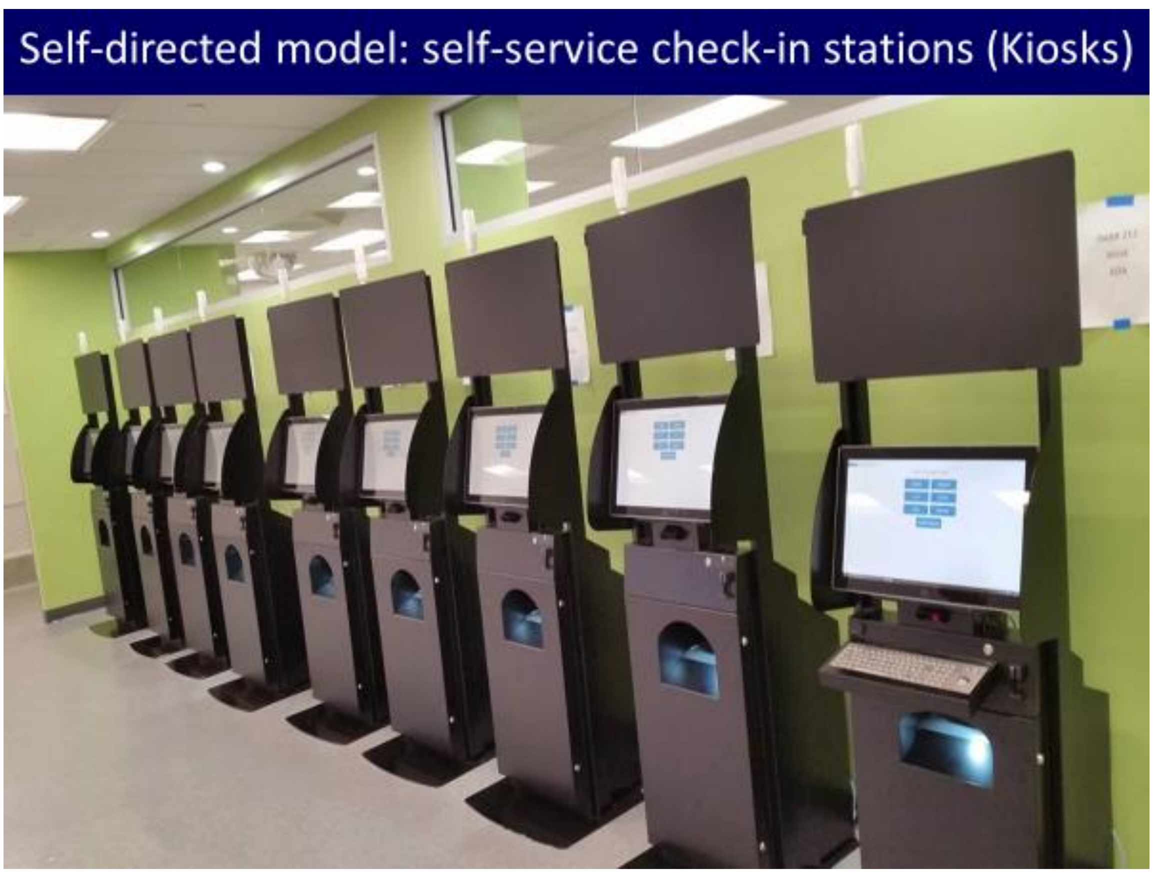
Launched ACCESS HRA

To improve access to benefits and information on a pending or active case, we have developed an online portal available to New Yorkers anywhere an internet connection is available. ACCESS HRA is an innovative tool that allows New York City residents to retrieve benefit information and apply and recertify for SNAP and other benefits. This portal allows clients to create an ACCESS HRA account to gain access to over 100 case-specific points of information in real-time, including application and case statuses, upcoming appointments, account balances, and documents requested for eligibility determinations. Additionally, clients can make changes to contact information, view eligibility notices electronically, and opt into text message and email alerts. We continue to improve this tool to add new functionality and recent updates now allow recipients to submit their SNAP Periodic Report in addition to reporting changes in circumstances, and active Cash Assistance clients can submit rent arrears and utility arrears requests, as well as other special grant requests, online for processing by their assigned Job Center.

HRA is a national model for client and staff-centered improvements to our service delivery

In June of 2017, HRA was invited to testify before the House Agriculture Committee Subcommittee on Nutrition concerning The Next Farm Bill: SNAP Technology and Modernization[1] where the Agency highlighted two primary and equal goals of our modernization efforts—improved client experience and optimized operational efficiency. Testimony focused on our work to improve the client experience and the Agency's ability to adapt to and incorporate new and emerging technology in its service delivery model while addressing the needs of the most vulnerable New Yorkers, including older New Yorkers and those with limited sight, mobility, and technology and broadband access. Our efforts then, and now, demonstrate our continuing commitment to address food insecurity and hunger by ensuring that every New Yorker who is eligible for Supplemental Nutrition Assistance Program (SNAP) has unencumbered access to this critical nutrition support while utilizing fewer administrative resources.

Over the past six years, HRA has invested in and delivered a self-directed service model for our SNAP clients. These self-service tools are available to all SNAP enrollees, and the data described below represents a wholesale channel shift in the way in which clients interact with the agency and take advantage of this model. The use of technology to conduct transactions using self-service tools are increasingly common for all New Yorkers and we want our clients to benefit from this approach as well. In addition to providing an enhanced client experience, this lower-touch model frees up our eligibility workers' time and allows them to focus on those clients who need more support.

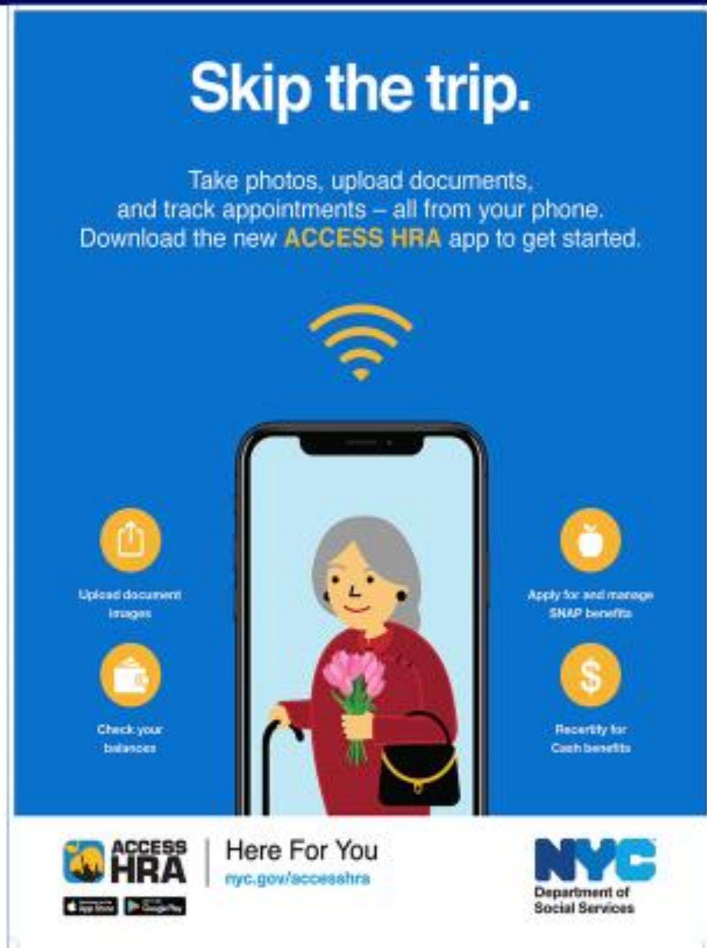


[1] https://www1.nyc.gov/assets/hra/downloads/pdf/news/testimonies/2017/june/SNAP_modernization_testimony_060617_ Final.pdf


Self-directed model: Self-service scanners
06/07/2017


Self-directed model: PC Banks
EXIT
PC Bank

Self-directed model: ACCESS HRA Mobile App



With ACCESS HRA clients can remotely:

- submit recertification forms for SNAP and CA,
- apply for SNAP (pending State approval, no remote applications for CA have been permitted aside from those submitted at certain CBO pilot locations – the State has recently approved in concept online applications for all applicants subject to review of a technical waiver),
- apply for special CA related grants such as rent or utility arrears for currently active CA clients,
- submit the SNAP 6-month mailer,
- submit SNAP case change requests,
- print Medicaid renewals,
- upload documents,
- check the status of their case, and
- opt for email notifications.

As of late January 2020, in total, we have 2.2 million AHRA accounts. Within the 2.2 million accounts, we have roughly 950,000 users who linked to their HRA case, such

as for Cash Assistance or SNAP benefits which allows them to read notices, complete case changes, apply for a special grant, among other actions.

On-Demand Telephone Interviews

In January of 2016, HRA launched an on-demand telephone interview option for SNAP recertification. At the time, the technology allowed clients in select boroughs to complete their telephone recertification interviews at their own convenience. Today, On-Demand telephone interviews are available for all SNAP clients who can call at a convenient time and never need to visit a center.

Information about ACCESS HRA and the availability of On-Demand telephone interviews for SNAP applications and recertifications are included in notices sent to clients. At Centers, clients are also directed to PC banks to complete applications and recertification forms using AHRA, which reduces time spent in the Centers. PC banks have knowledgeable and trained staff to assist clients in using HRA's online tools for submission. Center staff also encourage clients to avoid or minimize future trips to our offices by calling for their interview and using AHRA's mobile document upload feature to submit documentation, review their HRA notices, view upcoming appointments, check their EBT balance, print budget letters and many other functions of this tool.

The result:

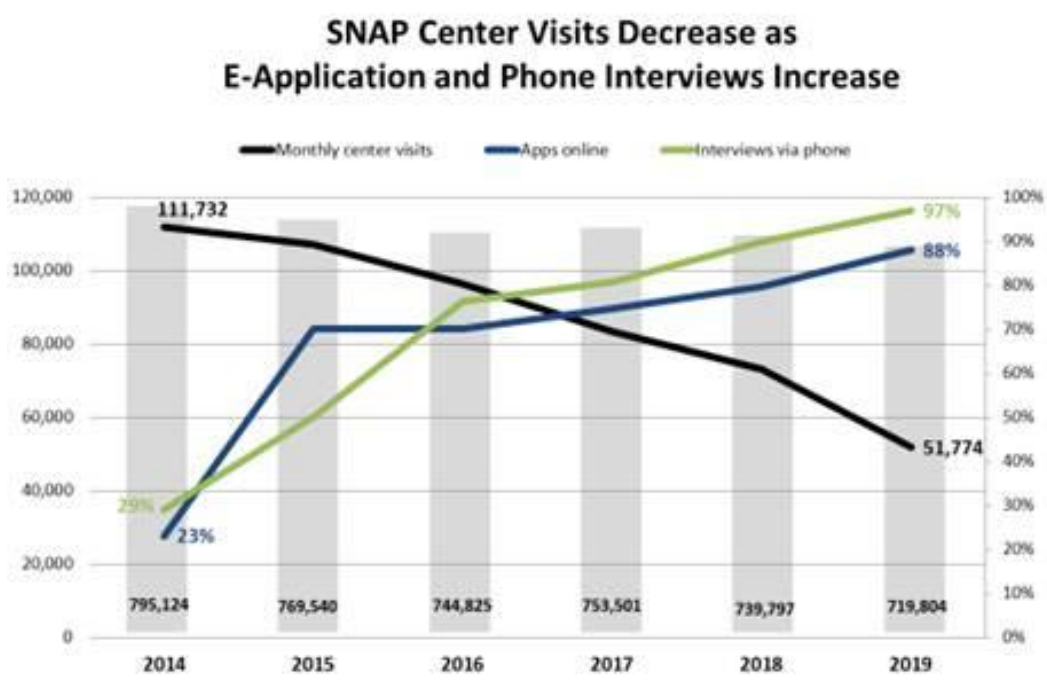
Over 50% decline in monthly foot traffic in SNAP Centers with 88% of SNAP applications being completed online throughout 2019 and over a 97% phone interview rate for SNAP applications

- As we reorganize services to improve and streamline how we connect our clients to benefits/resources, it is important to note the channel shifts we are seeing in how New Yorkers are now accessing their benefits via the ACCESS HRA platform:
  - 88% of New Yorkers are now choosing to access benefits through ACCESS HRA and 97% are now conducting SNAP interviews over the phone.

- Citywide SNAP in-center foot traffic has declined by more than 50% since 2014, largely driven by the increased use of ACCESS HRA.

- The percentage of SNAP applications submitted online increased from 23% in 2013 to 88% in 2019.
  - 82% of those applications are submitted out-of-center, with the remainder submitted online at DSS-HRA kiosks and PC banks within HRA centers.
    - Meaning approximately 70% of all SNAP applications are submitted online and out-of-center.

- These client-centered reforms, transitioning to digital and modernizing Agency delivery of services, have helped reduce wait times, freeing up staff to focus on cases that require more in-person contact.



As our operation has become more efficient, clients have less need to come into Centers

Community Partners

These successes in integrating technological improvements to modernize our SNAP systems are only one part of the equation. We are also actively continuing our efforts to enroll low-income New Yorkers by reaching out to New York City's universe of direct service providers to familiarize them with the user-friendly features of ACCESS HRA. Further, we develop partnerships with sites that utilize the ACCESS HRA Provider Portal – an online tool designed for Community-Based Organizations (CBOs) to connect with the very clients they serve. Through the ACCESS HRA Provider Portal, organizations can view real-time benefit information for their clients and help them manage their cases – a service that reduces the possibility of benefits being lost due to a lapse in recertification, for example.

Since the launch of the Provider Portal tool in September 2017, 256 organizations have signed up to utilize this tool. We provide in-depth training on ACCESS HRA to CBO partners who assist clients with benefits enrollment. Our Office of Advocacy and Outreach (OAO) conducts the AHRA trainings for community-based organization staff who provide SNAP enrollment and case management services to their constituents. Specifically designed for CBO staff and case workers, these trainings provide in-depth instruction in the use and benefits of the ACCESS HRA Client Portal, the Provider Portal, and the mobile app.

Since July 2017, OAO has conducted 280 ACCESS HRA trainings for CBOs. CBOs are encouraged to inform clients of the provider portal and the benefit of consenting to share their HRA case information. While meeting with a client and assisting with an application or recertification in AHRA, CBO partners can use the provider portal. One of the many benefits of the Provider Portal is that once a CBO receives consent from a client, they are able to view that client's case information and provide case management support without the need for the client to have to come into the CBO office. Clients give consent one time and renew that consent every 24 months. Information on ACCESS HRA and the AHRA mobile app is provided at every event DSS Outreach staff attends. In 2019, DSS Outreach staff participated in more than 650 community-based events.

Accessing Benefits

All of the self-service PC banks at our SNAP and Job Centers have staff on duty who have been trained extensively in ACCESS HRA and are able to give clients step-by-step assistance through the process. We also have a user's guide available online.

OAO's SNAP Outreach program also provides one-to-one SNAP application assistance through ACCESS HRA on-site at community locations throughout NYC, with an emphasis on reaching populations facing unique barriers to access, including seniors, veterans, immigrants, people with limited English proficiency, and many others.

In 2019, SNAP Outreach held 820 site visits across the five boroughs to assist 9,114 New Yorkers with one-to-one SNAP enrollment, pre-screening, and case management support. These visits were held at over 300 unique locations, one-third of which were recurring community sites on a weekly, bi-weekly, or monthly basis.

Communications

In March 2019, we kicked-off the "Skip the Trip" ad campaign to promote ACCESS HRA. The goal of the campaign is to familiarize both existing and potential clients about the new, enhanced functionalities of ACCESS HRA 5.0. Through different messages, we can communicate to New Yorkers that:

- ACCESS HRA has many functionalities, including, for the first time ever, providing clients with a truly seamless way to apply for SNAP and submit a recertification for Cash Assistance using their smartphones and thereby avoid or minimize the need to come into one of our offices;
- ACCESS HRA is a modern tool that allows New Yorkers in need to be connected with benefits;
- New Yorkers can apply for benefits from the comfort of their home or at a trusted community site without having to come into one of our offices; and
- HRA/DSS is continuing to find new, modern ways to communicate with New Yorkers about benefits.

Overview of campaign

The "Skip the Trip" ad campaign was conducted across the following platforms:

- **Transit**: 2,000 subway ads, 1,000 bus ads, 50 bus shelters

- **Print**: A total of 30 different publications, including dailies, weeklies, as well as community- and foreign language-print, covering English, Spanish, Russian, Traditional and Simplified Chinese, Haitian Creole, Korean, Polish, Yiddish, Arabic, and Bangla

- **Radio**: 11 different stations, covering English, Spanish, Russian, Chinese (spoken)

- **In the Community**: 145 advertisements in nail salons, barber shop, laundromats, bodegas, etc. in the top 20 SNAP-using ZIP codes. These are in English and Spanish, as well as in Yiddish in one ZIP (Borough Park)

- **Social Media**: Videos and static posts on Instagram, Facebook, and Twitter, in both English and Spanish

- **New print collateral**: New brochures, palm cards, and posters for broad use by outreach teams, elected officials, CBOs, sister agencies, in centers, etc**.**

- **In-center marketing**: Posters in centers that clearly outline the benefits of ACCESS HRA

Targeted Follow-Up Campaigns

Lesbian Gay Bisexual Transgender Questioning & Intersex (LGBTQI)

After the main campaign came to an end in June 2019, we launched a targeted campaign reaching out to the LGBTQI population. We ran ads utilizing the following media:

- social media
- targeted dating apps
- Gay City News

Students

In September 2019, we partnered with CUNY to launch the CUNY Food Insecurity Campaign to reach students. We ran ads utilizing the following media:

- social media
- ethnic digital platforms
- LinkNYC kiosks located around the CUNY campuses
- Brochure/palm card

In addition, we will be distributing brochures and hanging posters in campus food pantries, health centers, child care centers and Single Stop Centers.

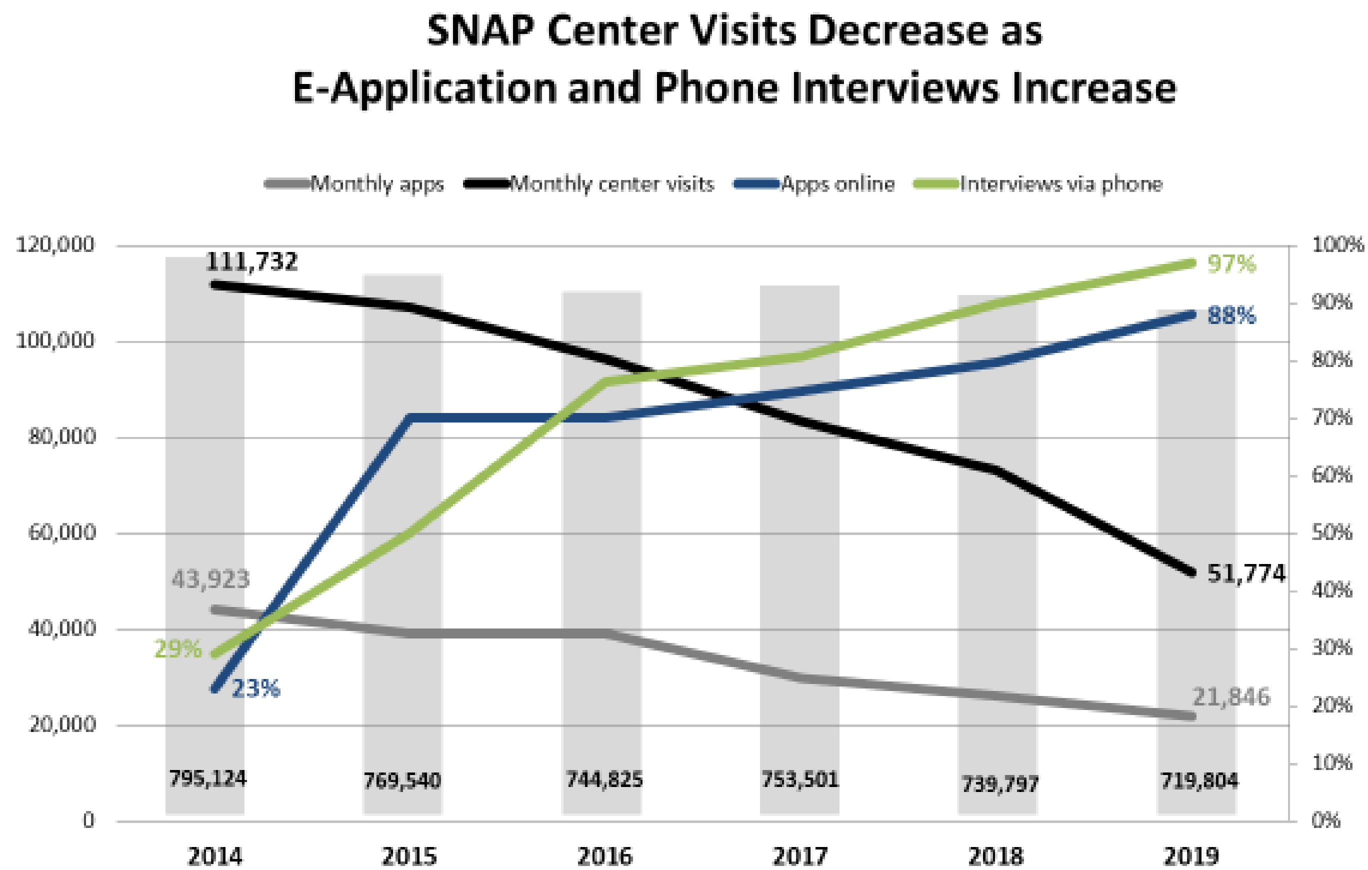
Seniors

We are now planning the next segment of the campaign that will target seniors set to launch in March 2020.

The result:

Activity		**ACCESS HRA MONTHLY NUMBERS**			
		Sep-18	**Sep-19**	**Change by Count**	**YOY % Change (Sep)**
Login	Web Portal	346,000	492,131	146,131	42.2%
	Mobile App	891,981	1,327,480	435,499	48.8%
	Total	**1,237,981**	**1,819,611**	**581,630**	**47.0%**
View Case Details	Web Portal	246,771	499,838	253,067	102.6%
	Mobile App	609,437	1,415,013	805,576	132.2%
	Total	**856,208**	**1,914,851**	**1,058,643**	**123.6%**

Online Application Submissions	SNAP Application	22,373	24,679	2,306	10.3%
	SNAP Recertification	13,925	14,809	884	6.3%
	SNAP Periodic Report	3,108	5,018	1,910	61.5%
	SNAP Case Change	N/A	1,273	N/A	N/A
	Total SNAP	**39,406**	**45,779**	**6,373**	**16.2%**
	Cash Application	3,280	4,026	746	22.7%
	Cash Recertification	1,371	1,775	404	29.5%
	Cash Special Grants	N/A	237	N/A	N/A
	Total Cash	**4,651**	**5,801**	**1,150**	**24.7%**
	Total All Online Application Submissions	**44,057**	**51,580**	**7,523**	**17.1%**
Document Uploads	Document Uploads per case	34,125	35,464	1,339	3.9%
Profile Update Calls	Web Portal	5,936	8,300	2,364	39.8%
	Mobile App	4,317	5,382	1,065	24.7%
	Total	**10,253**	**13,682**	**3,429**	**33.4%**
E-Notices	E-Notices	235,585	288,553	52,968	22.5%
Account Link Calls	Web Portal	45,237	68,224	22,987	50.8%
	Mobile App	35,484	39,441	3,957	11.2%
	Total	**316,306**	**396,218**	**79,912**	**25.3%**



Wait Times

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to the following data from the prior calendar year concerning:

1. ***The current wait times at each Job Center and SNAP Center for each ticket regardless of ticket type;***
2. ***The total current wait times at each Job Center and SNAP Center for each visitor combining all ticket types;***
3. ***The current wait times at each Job Center and SNAP Center for each ticket, disaggregated by the type of ticket by queue;***
4. ***The total time a visitor spends at each Job Center and SNAP Center beginning when a ticket is issued and ending when the visitor's last ticket of the day is closed;***
5. ***The number of visitors who are issued more than one ticket at Job Centers or SNAP Centers on the same day;***

In CY2019 the overall 12-month average citywide wait time for SNAP was 25 minutes while that average wait time for Cash Assistance was 46 minutes. In the individual month of September 2019, the average wait time for SNAP was 30 minutes while that average wait time for Cash Assistance was 51 minutes. Further review of wait times included the Cash Assistance average wait time by ticket type, the chart below presents data concerning Center volume by ticket and average wait time including negative wait time[2]. The citywide wait time by ticket in September 2019 including negative wait time was 1:00:34 while the wait time excluding negative wait time was 1:01:56.

Cash Assistance Average Wait Time by Ticket, September 2019

Job Center	Ticket Volume	Average Wait Time
Bushwick	14,614	1:17
Clinton Hill	17,005	1:05
Concourse	8,411	1:42
Coney Island	7,781	0:44
Crotona	23,127	0:55
Dekalb	10,843	1:00
Dyckman	8,015	0:44
East End	9,657	1:02
Fordham	11,217	1:03
Hunts Point	14,748	1:00
Jamaica	11,999	0:53
Queens	7,941	0:47
Refugee	810	0:14
Richmond	6,685	0:58
Rider	12,929	1:15
Rockaway	5,079	1:00

[2] Negative wait time is calculated by taking the scheduled appointment time minus the time spent waiting if the client arrived before their scheduled appointment

Southern Brooklyn	6,273	0:45
St Nicholas	5,723	0:53
Waverly	14,955	1:04
All Job Centers	**197,812**	**1:00**

An additional review of wait time data explored the time a unique visitor spent in the Job Center which included multiple tickets. The September citywide average was 1:36:49 with the negative wait time excluded and the September citywide average was 1:34:35 with the negative wait time included. Here is a typical scenario for when multiple tickets would be issued: A unique visitor might come to the Center with the intention of applying for Cash Assistance; however, in the course of the interview we learn that the client might benefit from meeting with our Homeless Diversion Unit to address a homelessness prevention problem. In these instances, rather that asking a client to come back on a later date and time for another appointment, clients are able to see a worker who specializes in homelessness prevention on that same day. This division of labor recognizes the specialization of our workforce which benefits clients. This specialization provides a structure between staff making eligibility determinations (Job Opportunity Specialists) and those who are not but have expertise in issuing special grants, as such this helps ensure program integrity and accountability.

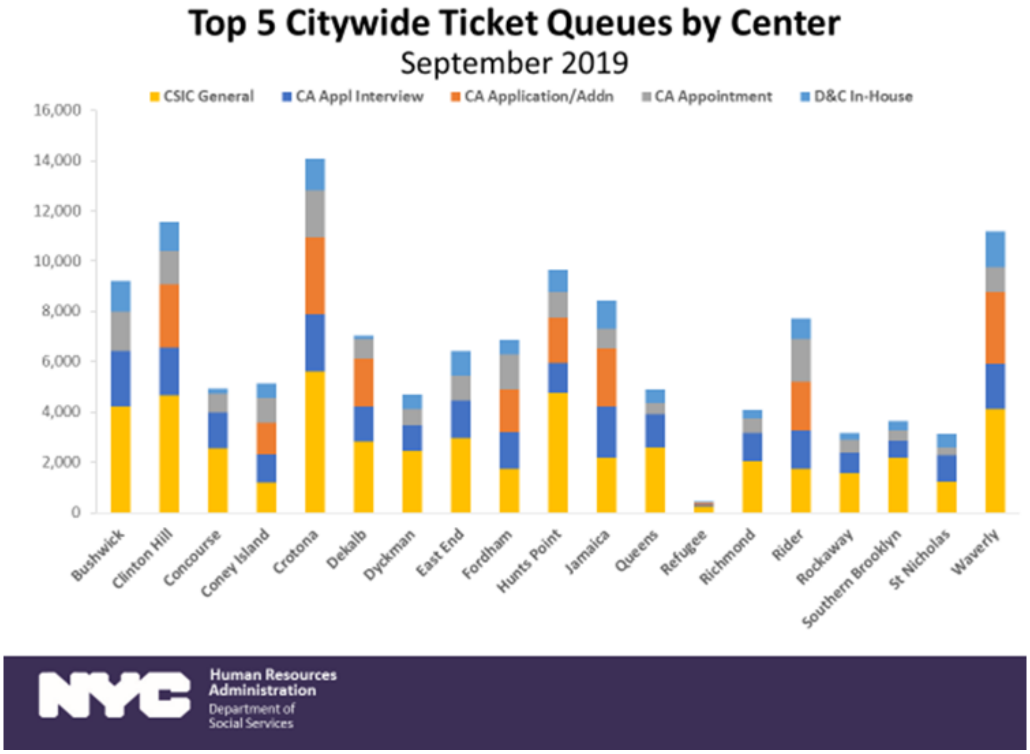
In looking at the citywide average for wait time by ticket versus wait time by unique visitor, we see an increase of approximately 30 mins for clients requiring more than one ticket during their visit to our Centers.

Cash Assistance Average Wait Time by Visitor, September 2019

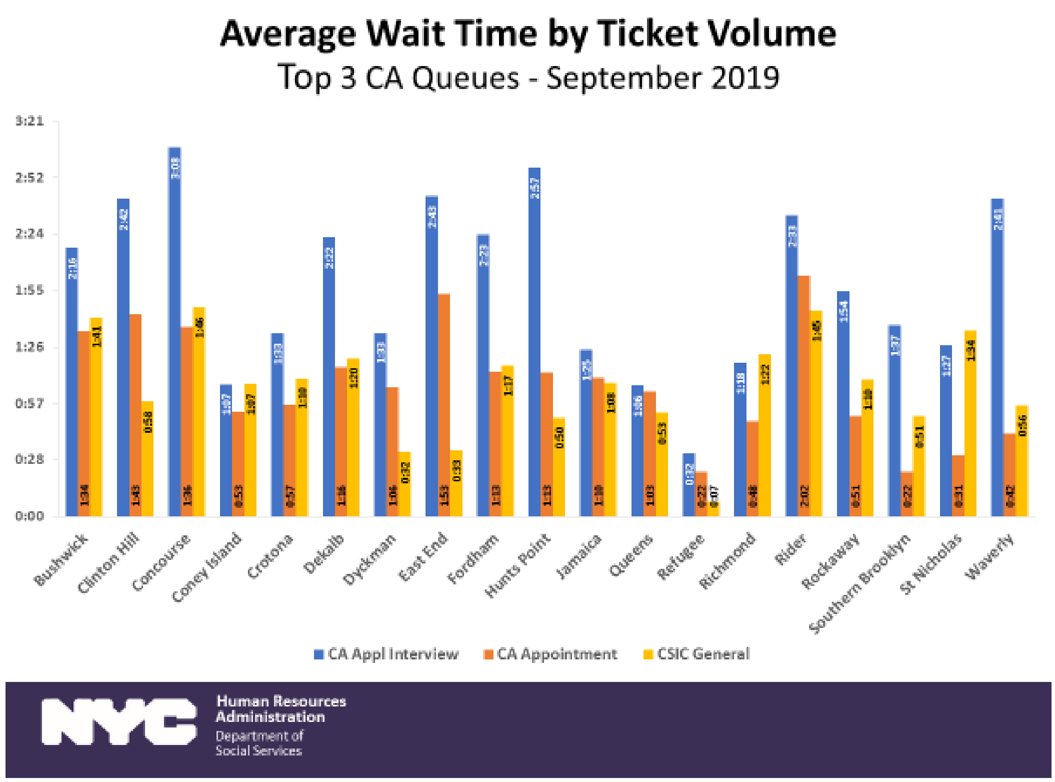
Job Center	Visitors	Average Wait Time
Bushwick	9,199	1:54
Clinton Hill	8,516	2:01
Concourse	5,632	2:22
Coney Island	4,916	1:06
Crotona	12,373	1:38
Dekalb	6,121	1:40
Dyckman	4,732	1:11
East End	5,479	1:41

Fordham	7,006	1:35
Hunts Point	8,386	1:40
Jamaica	6,944	1:24
Queens	5,001	1:10
Refugee	532	0:25
Richmond	5,352	1:11
Rider	8,347	1:50
Rockaway	3,461	1:24
Southern Brooklyn	3,768	1:10
St Nicholas	4,372	1:08
Waverly	8,720	1:41
All Job Centers	123,434	1:34

In September 2019, the top five ticket queues at our Job Centers were: CSIC General, Cash Assistance Application interview, Cash Assistance Application/Addition, Cash Assistance Appointment and Disbursement and Collection (D&C) In-House. 64% of Center traffic stems from five queues: Customer Service Information Center (CSIC) General (26%), CA Application Interview (13%), CA Application/Addition (10%), CA Appointment (9%) and D&C In-House (6%). The highest volume ticket queue is CSIC General. This category currently captures those clients coming into the Center who have active cases but do not have an appointment, do not identify themselves at a kiosk, are still in application status but do not have an appointment, or who indicate at the kiosk that they want to see a worker.



Crotona is the largest Job Center and double the size of Concourse. As such, there are significantly more tickets at the Crotona Job Center.



The citywide average is 37% or 1 in 3 clients coming into Job Centers receiving more than one ticket on the same day. However, exploring these numbers further, we see differences in the center by center comparisons which indicates that clients experience different types of needs when they come to us, some facing deeper poverty and requiring different supportive services as they get back on their feet. For example, Community District 5 of the borough of the Bronx, which comprises the neighborhoods of Fordham, University Heights, Morris Heights and Mount Hope ranks highest in the borough for individuals on Cash Assistance. 59.3% of households are rent burdened, spending 35% or more of their income on rent[3]. Further, 35.6% of residents have incomes below the NYC.gov poverty threshold[4].

In Brooklyn, Community District 5, which comprises the neighborhoods of Broadway Junction, City Line, Cypress Hills, East New York, Highland Park, New Lots, Spring Creek and Starrett City, ranks highest in the borough for individuals on Cash Assistance. 48.7% of households are rent burdened[5]. Further, 28.7% of residents have incomes below the NYC.gov poverty threshold compared to 19.8% in NYC[6].

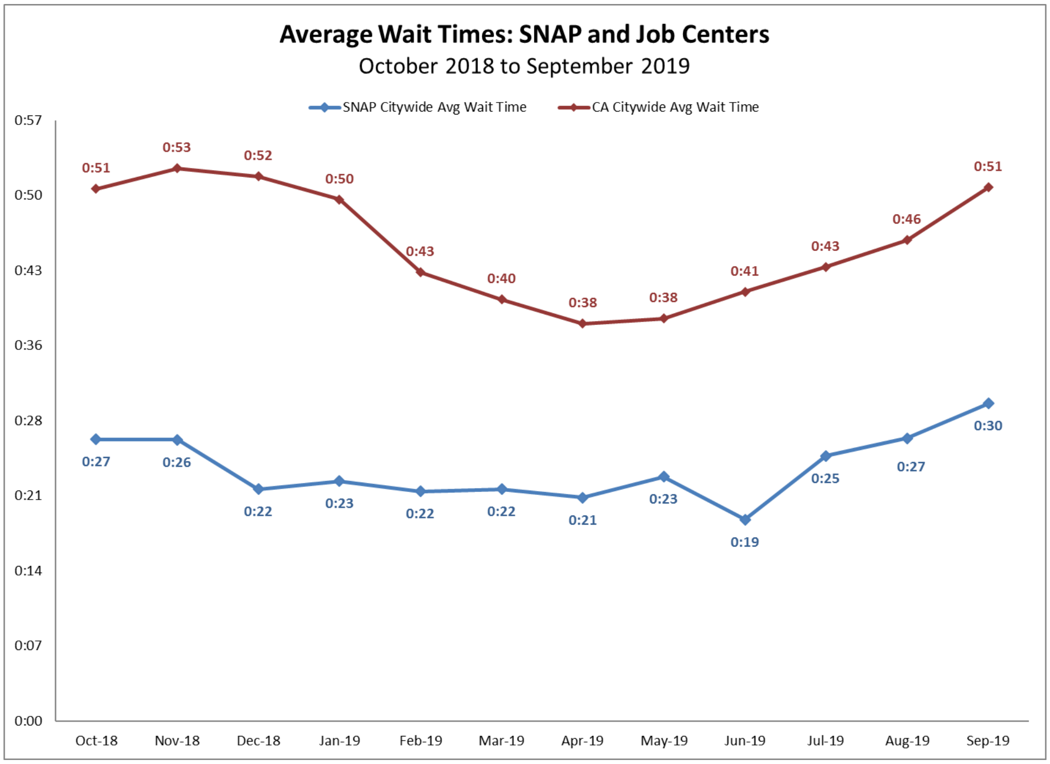
JOB CENTER Average Wait Time Table by Center and Month

Job Center	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19
Bushwick	1:01	0:57	1:01	1:01	1:00	0:46	0:50	0:50	0:59	0:56	1:10	1:16
Clinton Hill	0:55	1:02	1:02	1:02	0:47	0:45	0:42	0:44	0:43	0:49	0:55	1:05
Concourse	1:52	2:01	1:41	1:50	1:41	1:15	1:13	1:16	1:25	1:36	1:40	1:42
Coney Island	0:44	0:41	0:40	0:36	0:30	0:28	0:27	0:25	0:30	0:32	0:34	0:43
Crotona	1:09	0:58	0:52	0:52	1:02	0:40	0:38	0:42	0:46	0:45	0:51	0:54
Dekalb	0:55	1:04	1:00	1:05	0:55	0:48	0:45	0:48	0:50	0:53	0:55	0:59
Dyckman	0:38	0:45	0:49	0:40	0:39	0:35	0:31	0:34	0:36	0:38	0:40	0:44
East End	0:47	0:58	1:02	1:00	0:45	0:40	0:35	0:32	0:43	0:48	0:51	1:02
Fordham	1:19	1:24	1:21	1:10	0:57	0:50	0:47	0:43	0:50	0:53	0:58	1:02
Hunt's Point	0:54	1:04	1:07	1:10	0:45	0:55	0:50	0:49	0:58	0:59	0:57	1:00
Jamaica	0:45	0:48	0:44	0:44	0:41	0:35	0:32	0:37	0:39	0:46	0:48	0:53
Queens	0:46	0:49	0:44	0:42	0:48	0:38	0:37	0:39	0:40	0:41	0:42	0:46
Refugee	0:20	0:19	0:19	0:15	0:18	0:19	0:13	0:10	0:09	0:09	0:11	0:14
Richmond	1:17	1:18	1:11	1:06	1:11	0:45	0:42	0:52	0:52	0:59	0:56	0:58
Rider	0:56	1:04	1:02	0:57	0:48	0:54	0:48	0:48	0:54	0:58	1:00	1:14
Rockaway	1:01	1:09	1:06	1:01	0:47	0:44	0:43	0:42	0:42	0:50	0:51	1:00
Southern Brooklyn	0:43	0:45	0:43	0:39	0:30	0:40	0:38	0:41	0:39	0:40	0:40	0:45
St. Nicholas	0:49	0:50	0:49	0:52	0:37	0:46	0:38	0:40	0:42	0:41	0:42	0:53
Waverly	1:09	1:12	1:06	1:01	0:54	0:50	0:53	0:48	0:52	0:49	1:01	1:03
Job Center Monthly Average	**0:51**	**0:53**	**0:52**	**0:50**	**0:43**	**0:40**	**0:38**	**0:38**	**0:41**	**0:43**	**0:46**	**0:51**

SNAP Center Wait Time

As we have testified during Council oversight hearings, we have seen a significant decline in our SNAP wait times as a result of our modernization efforts that have been approved by the federal and state governments. Today, all SNAP transactions can take place without the need for clients to come to the Center. The citywide average wait time in September 2019 was 30 minutes.

[3] https://communityprofiles.planning.nyc.gov/bronx/5
[4] Ibid
[5] https://communityprofiles.planning.nyc.gov/brooklyn/5
[6] Ibid



Further review of wait times included the SNAP average wait time by ticket type, the chart below presents data concerning Center volume by ticket and average wait time excluding negative wait time. The citywide wait time by ticket in September 2019 including negative wait time was thirty-four minutes, thirty-six seconds while the wait time including negative wait time was thirty-four min, twenty seconds.

Home Centers	SNAP Average Wait Time by Ticket (negative wait time included)	Tickets
Concourse	0:43:01	4,130
Coney Island	0:34:31	4,420
Crotona	0:55:16	4,333
East End	0:30:33	4,218
East NY	0:54:01	1,999
Hunts Point	0:29:50	1,633
Jamaica	0:17:52	3,059
Queens	0:45:31	3,322
Richmond	0:15:03	1,656

Rockaway	0:32:25	1,337
SSI	0:21:57	1,679
Washington Heights	0:14:30	1,943
Waverly	0:16:33	2,039
Williamsburg	0:34:12	2,663
Citywide	**0:34:20**	**38,431**

SNAP Average Wait Time Comparison

	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19
Concourse	1:11	1:00	1:00	1:03	1:06	1:13	1:09	0:30	0:34	0:50	0:42
Coney Island	0:23	0:21	0:23	0:21	0:19	0:16	0:19	0:15	0:13	0:16	0:34
Crotona	1:02	0:48	0:47	0:35	0:43	0:36	0:37	0:33	0:37	0:38	0:54
East End	0:30	0:22	0:31	0:30	0:30	0:29	0:27	0:27	0:30	0:23	0:30
East NY	0:39	0:29	0:26	0:32	0:31	0:26	0:24	0:34	0:36	0:51	1:01
Hunts Point	0:31	0:28	0:26	0:22	0:19	0:25	0:27	0:26	0:28	0:26	0:29
Jamaica	0:20	0:17	0:17	0:16	0:16	0:16	0:13	0:12	0:15	0:17	0:17
Queens	0:37	0:24	0:25	0:28	0:25	0:24	0:23	0:28	0:37	0:39	0:45
Richmond	0:11	0:10	0:11	0:12	0:11	0:09	0:09	0:11	0:10	0:13	0:14
Rockaway	0:32	0:27	0:27	0:24	0:25	0:24	0:22	0:25	0:29	0:32	0:31
SSI	0:24	0:24	0:28	0:22	0:29	0:26	0:29	0:29	0:31	0:26	0:21
***St. Nicholas**	0:11	0:12	0:12	0:14	0:10	0:09	0:11	0:10	N/A	N/A	N/A
Washington Heights	0:12	0:12	0:11	0:13	0:11	0:12	0:13	0:14	0:16	0:17	0:13
Waverly	0:21	0:15	0:15	0:11	0:12	0:11	0:12	0:13	0:10	0:14	0:15
Williamsburg	0:28	0:28	0:26	0:28	0:27	0:23	0:22	0:25	0:26	0:27	0:33

Citywide Avg. Wait Time	0:26	0:22	0:23	0:22	0:22	0:21	0:23	0:19	0:25	0:27	0:30

An additional review of wait time data, see below, explored the time a unique visitor spent in the SNAP Center, which could include multiple tickets.

In 93.60% of SNAP cases, there was only one (1) ticket per SNAP-only client at a SNAP Center. Reasons for multiple tickets in the 6.4% of the cases that do not follow this normal course could be: (1) misrouting of client at first ticket (i.e., sending to Applications Unit when client should have gone to CSIC); and, (2) erroneous completion of ticket which requires the client to go back to worker (i.e., client thought they submitted all the documentation or completed a transaction, but was mistaken, and wants to go back to finish reason for visit).

SNAP Average Wait Time by Visitor
September 2019

Home Centers	SNAP Average Wait Time by Visitor (negative wait time included)	Tickets
Concourse	0:57:46	3,699
Coney Island	0:40:44	3,505
Crotona	1:15:22	3,855
East End	0:41:29	3,654
East NY	1:02:46	1,823
Hunts Point	0:29:53	1,545
Jamaica	0:18:01	3,046
Queens	0:56:51	2,908
Richmond	0:23:50	1,501
Rockaway	0:43:24	1,148
SSI	0:21:57	1,679
Washington Heights	0:23:58	1,687
Waverly	0:35:35	1,812

Williamsburg	0:52:32	2,411
Citywide	0:44:44	34,273

In September 2019, the top three ticket queues at our SNAP Centers were: CSIC NCA General, NCA Recertification and NCA Intake. The majority of in-center traffic stems from three queues: CSIC NCA General (67%), NCA Recertification (11%) and NCA Intake (8%), together accounting for 86% of SNAP tickets in September 2019. 6.4% of SNAP clients who visit in Center are issued multiple tickets on the same day.

Over the past year SNAP application volume has increased by 7.4%, due to successful outreach campaigns and the promotion of AHRA. The SNAP caseload has decreased by 3.5% over the same period, indicating both improving national trends relating to economic conditions, including the local minimum wage increase, and the chilling effect on immigrant New Yorkers who are eligible for SNAP resulting from the Trump Administration's anti-immigrant policies, and a decline in the proportion of applicants meeting eligibility requirements. Accordingly, the citywide application acceptance rate shows a slight downward trend in the later months of 2019.

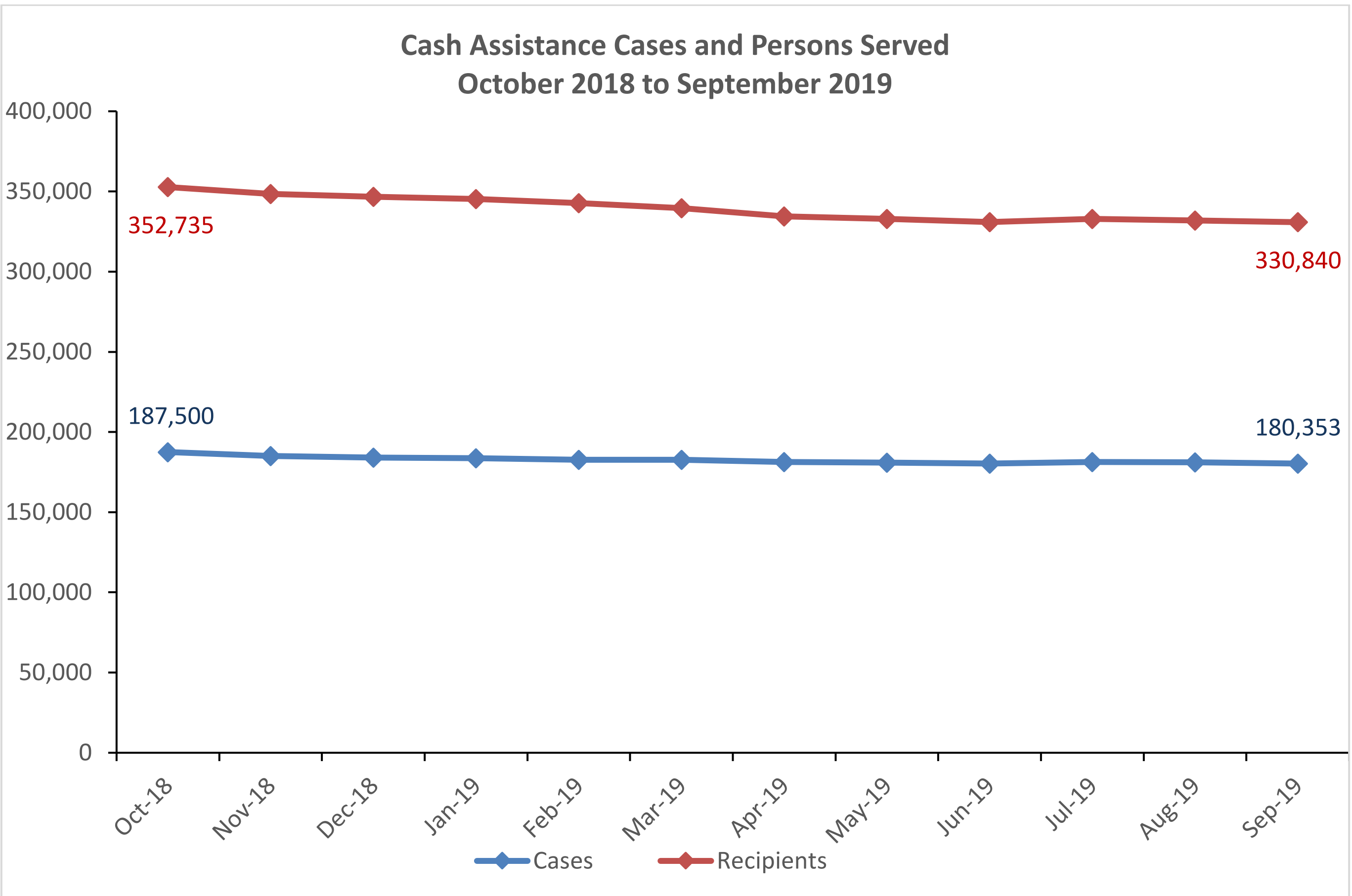
The majority of applications and an increasing proportion of recertifications are submitted electronically, with the latter rate increasing from 37% in March 2019 to 46% in September 2019.

Citywide SNAP Center wait times are 29 minutes in-center and 25 minutes via on-demand for October 2019. On-demand wait times for service agent calls and application and recertification interviews increased in 2019, largely due to the increase in application volume. October 2019 data shows a reversal in these trends, with notably lower wait times and increased service levels.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the department. This section is responsive to:

6. ***For each Job Center and SNAP Center, the number of cases and persons served and the number of applications received, disaggregated by whether such cases or applications are recurring or non-recurring;***
7. ***For each Job Center and SNAP Center, the average case size, the number of adults and children served by the Center's caseload and the percentage of applications accepted;***
8. ***The number of recertifications scheduled at each Job Center and SNAP Center;***

Cash Assistance Caseload



A review of the Cash Assistance caseload indicates that the monthly case and recipient caseloads have decreased by 4% and 6% respectively between October 2018 and September 2019. Crotona is the largest Job Center in the city serving roughly 8.5% of all CA recipients and 7% of the citywide caseload each month.

Cash Assistance Caseload Snapshot

September 2019

Indicator	September 2019
CA Cases	180,353
CA Recipients	330,840
Adults on CA	184,557
Children on CA	146,283
CA Case Size	1.8
CA Recurring Applications	17,390
CA Non-Recurring Applications	8,015
% of Apps Accepted	54%
Recertifications Scheduled	14,043
CA JOS Staff Vacancy Rate (August 2019)	-20%

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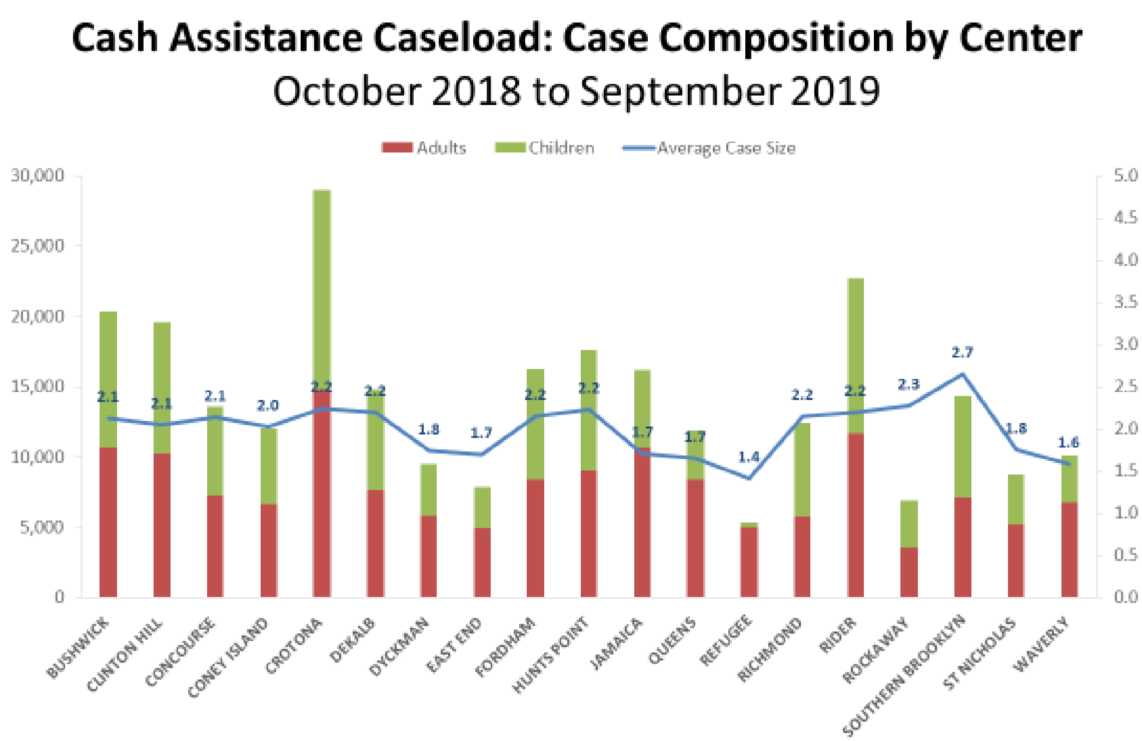
Cash Assistance Caseload: Case Composition by Center



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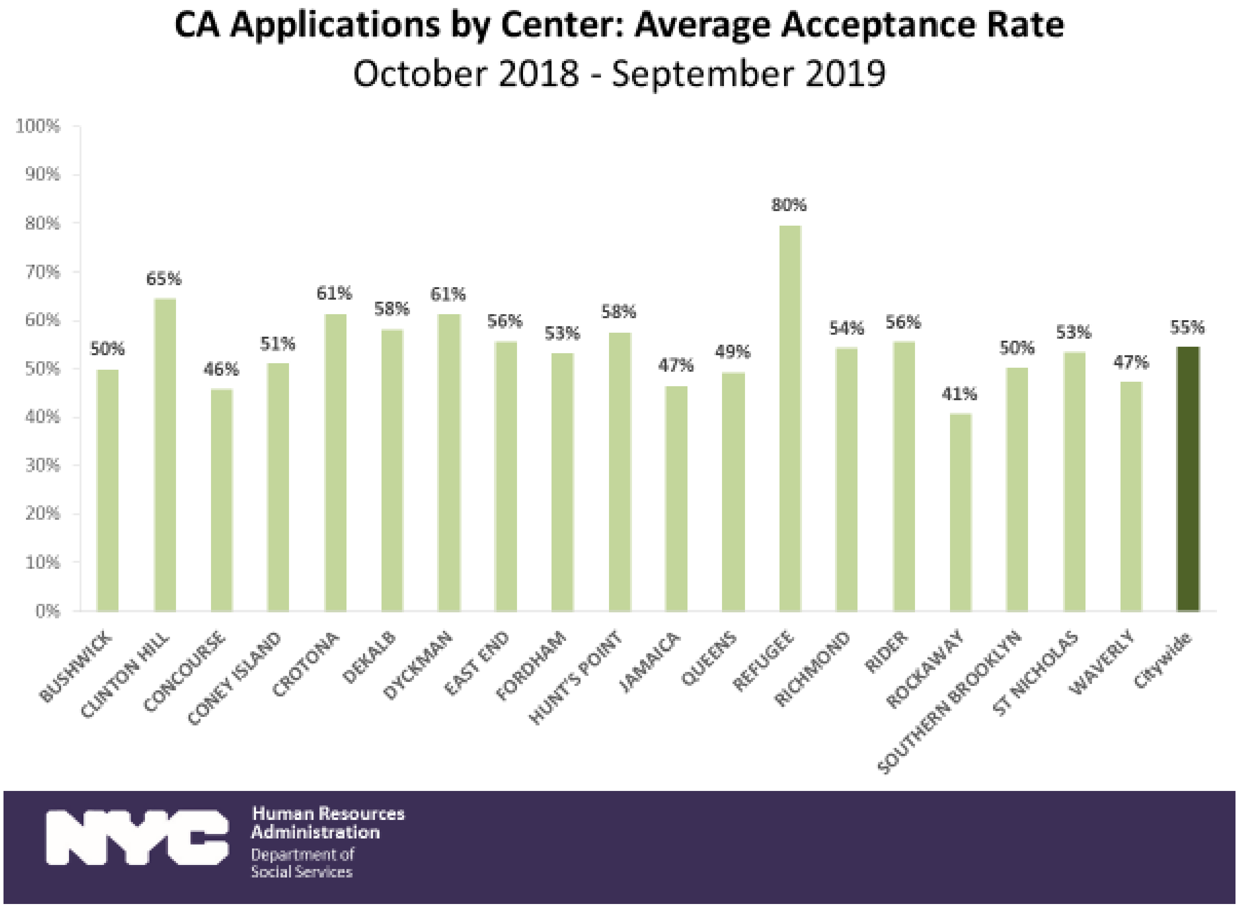
The average monthly caseload remained steady between October 2018 and September 2019 at 1.6 to 1.8 recipients per case.

Over the period, there were an average of 17,529 recurring and 7,785 non-recurring applications.



The acceptance rate has remained steady over the last 12 months at 54%.

The September 2019 Cash Assistance Caseload was 180,884 cases and 330,709 recipients. This was a decrease of 945 cases (0.5%) and a decrease of 1,698 (-0.5%) individuals from August.

- The recurring caseload decreased by 589 cases (-0.3%) and decreased by 919 individuals (-0.3%).
- The non-recurring caseload decreased by 356 cases (-8.6%) and decreased by 779 individuals (-9.1%).
- The total monthly caseload decreased from September 2018 by 6,618 cases (3.5%) and decreased by 20,360 individuals (-5.8%).

The 12-month unduplicated caseload for September 2019 was 573,148 unique individual recipients. This was a decrease of 1,426 individuals (-0.2%) from August 2019 and a decrease of 20,936 (-3.5%) since September 2018.

From August to September 2019, the number of Family Assistance recipients decreased by 1,238 (-1.1%) to a total of 109,982. The number of Safety Net recipients decreased by 344 (-0.2%) to a total of 138,060. The number of 60-Month Converted to Safety Net recipients decreased by 116 to a total of 82,667 (-0.1%).

There were 7,826 non-recurring CA recipients in September, a decrease of 779 from August (-9.1%). There were 8,015 applications for non-recurring assistance, an increase of 5 (0.1%) from the previous month. In September 2019, the application volume for non-recurring assistance was 3.3% higher than for the previous September. The rejection rate for August non-recurring applications was 40.2%, an increase of 2.5 percentage points from the previous month and an increase of 1.3 percentage points from the same month last year.

There were 322,883 recurring CA recipients in September, a decrease of 919 individuals (-0.3%) from August. There were 17,390 applications for recurring assistance in September, a decrease of 847 (-4.6%) from the previous month. In September 2019, the application volume for recurring assistance was 1.8% lower than the previous September. The rejection rate for August recurring applications was 42.8%, a decrease of 7.5 percentage points from the previous month and a decrease of 10.2 percentage points from the same month last year.

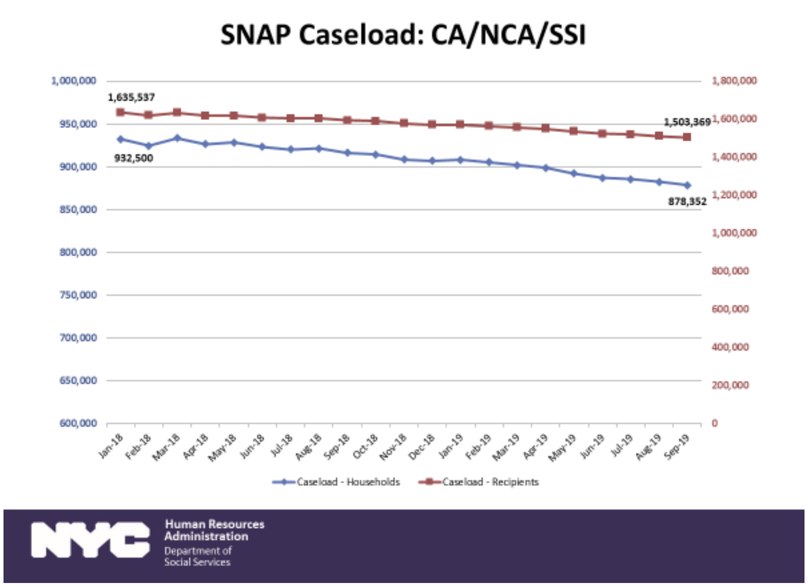
YTD failure to recertify and other recertification closings decreased in September 2019 by 23.8% and 18.4% respectively compared to September 2018. Meanwhile YTD negative closings increased by 22.9% and YTD non-negative closings increased slightly .9 percentage points in the same period.

January - September	CA Recurring Applications	CA Recurring Rejection Rate*	CA Recurring Case Closings	CA Non-Recurring Applications	CA Non-Recurring Rejection Rate*
CY 2017 YTD	168,772	49.5%	111,184	76,734	45.4%
CY 2018 YTD	167,681	51.8%	117,888	74,730	44.0%
CY 2019 YTD	159,622	49.1%	115,321	68,687	37.6%
Change 2017 - 2019	**-9,150**	**-0.4%**	**4,137**	**-8,047**	**-7.9%**
% Change 2017 - 2019	-5.4%		3.7%	-10.5%	
Change 2018 - 2019	**-8,059**	**-2.7%**	**-2,567**	**-6,043**	**-6.5%**
% Change 2018 - 2019	-4.8%		-2.2%	-8.1%	
*** rejection rate is lagged one month so includes Rejections from one month less than applications**					

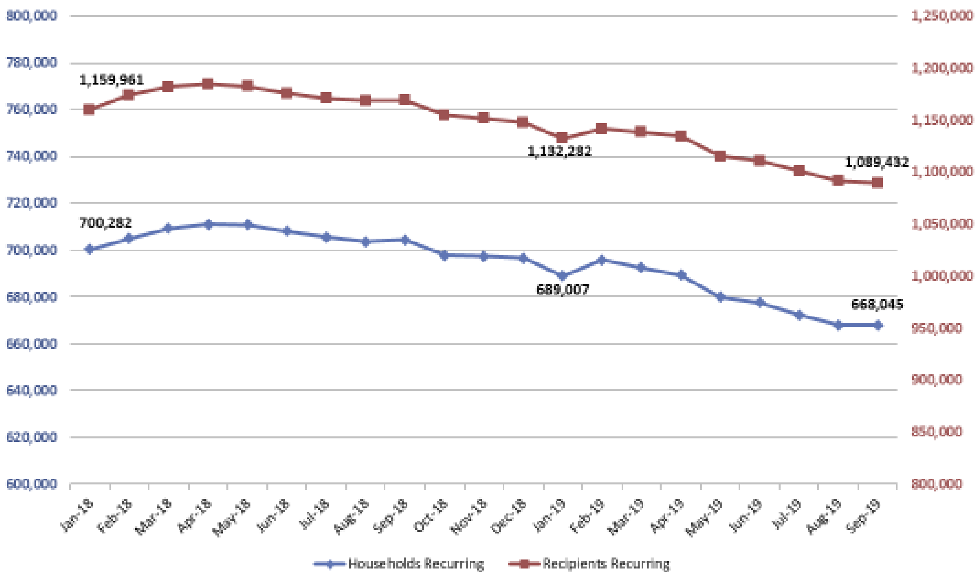
Cash Assistance Recertifications Scheduled by Job Center

Job Center	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jul-19	Aug-19	Sep-19
Bushwick	1,046	1,098	992	1,108	968	927	1,039	896	964	1,063	1,000
Clinton Hill	1,103	1,146	1,032	1,218	981	974	1,179	938	1,170	1,118	1,022
Concourse	677	736	652	744	689	652	661	585	537	614	584
Coney Island	556	537	580	629	531	507	566	452	516	503	484
Crotona	1,322	1,329	1,301	1,324	1,088	1,122	1,208	1,000	1,165	1,134	1,112
Dekalb	744	848	780	740	668	649	708	612	687	675	605
Dyckman	519	627	556	578	464	427	486	406	459	452	460
East End	470	492	444	447	437	396	473	381	421	440	463
Fordham	793	827	826	887	723	668	732	678	747	758	672
Hunts Point	767	838	832	859	762	741	860	704	879	883	846
Jamaica	865	956	909	1,081	883	878	976	771	864	931	847
Queens	566	590	587	648	559	615	652	555	628	614	580
Refugee	178	153	175	226	208	194	124	151	172	168	151
Richmond	544	546	509	566	448	460	535	439	487	493	445
Rider	1,094	1,084	1,135	1,052	911	977	1,127	848	960	1,032	1,003
Rockaway	324	349	302	317	276	260	320	277	333	335	287
Southern Brooklyn	471	487	469	522	474	492	553	430	451	520	451
St. Nicholas	518	558	527	528	465	464	503	449	582	512	393
Waverly	736	760	722	777	671	665	759	660	674	665	643

SNAP



SNAP Caseload: NCA Recurring



Note: January 2019 caseload numbers only include benefits issued for January and do not account for the early February benefits issued on 1/17/19 due to the government shutdown. The 1/17/2019 benefits are included in the February caseload numbers.

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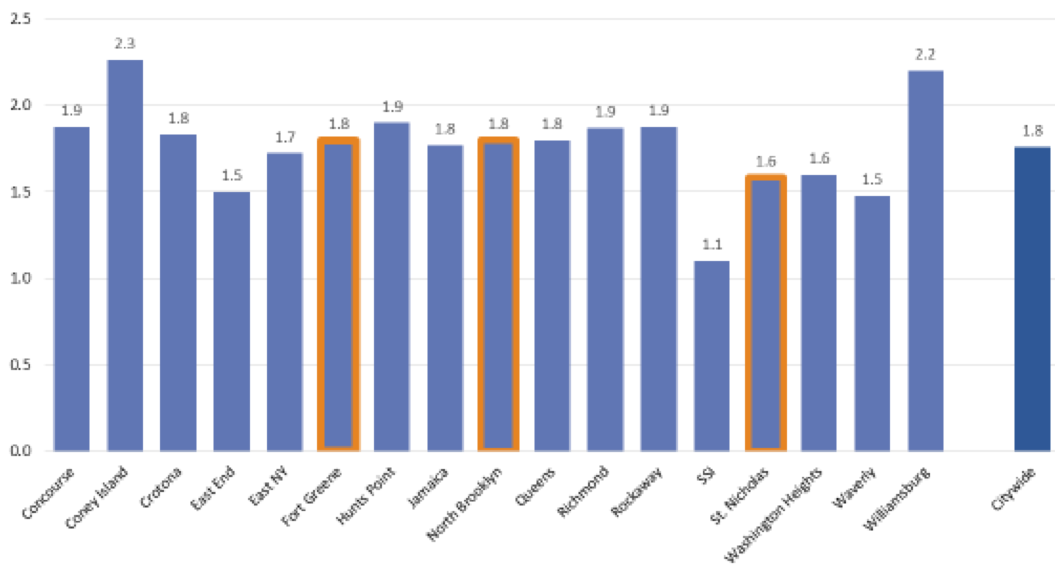
SNAP Caseload by Center: Average Case Size

September 2018 – September 2019



Note: North Brooklyn and Fort Greene closed on September 14, 2018. St. Nicholas closed on June 28, 2019.

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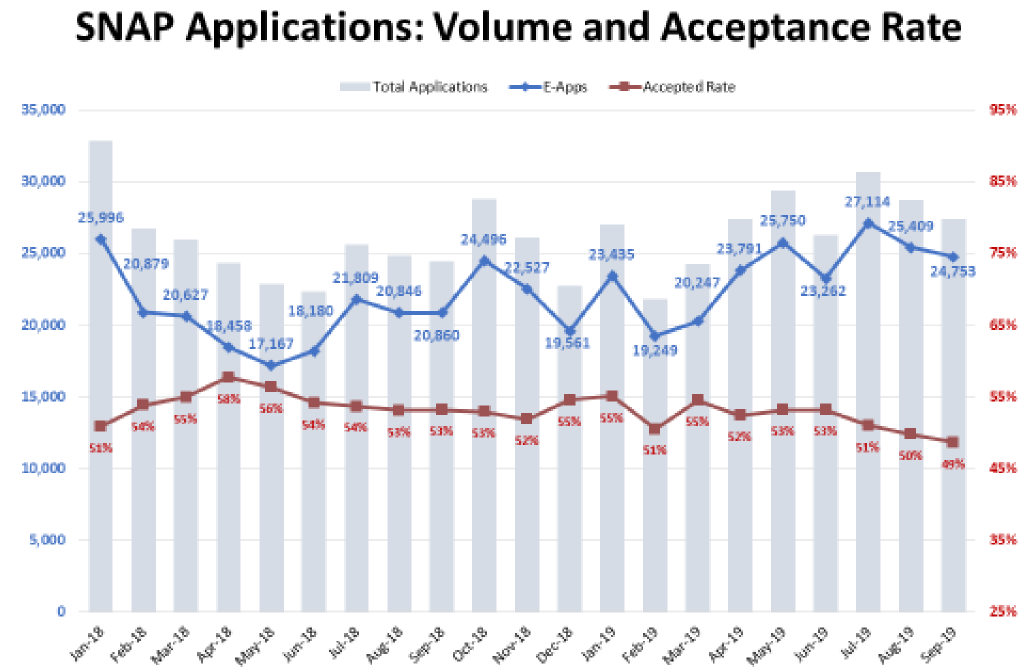

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As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the department. This section is responsive to:

9. ***The number of staff assigned to each Job Center and SNAP Center, disaggregated by title;***

Job Center Staffing

CA Staff Count By Title	SEP-19
ADMIN JOB OPOR SPEC M6	1
ADMIN JOB OPPTY SPEC (NM) I	40
ADMIN JOB OPPTY SPEC (NM) II	25
ADMIN JOB OPPTY SPEC M2	5
ADMIN JOB OPPTY SPEC M3	4
ADMIN JOB OPPTY SPEC M4	3
ADMIN MGR (NM) 1	3
ADMIN STAFF AN NM FMR M2	2
ADMIN STAFF ANALYST (NM)	3
ADMIN STAFF ANALYST M7	1

ASSOC JOB OPPORTUNITY SPEC I	315
ASSOC JOB OPPORTUNITY SPEC II	102
ASSOC JOB OPPORTUNITY SPEC III	23
ASSOC STAFF ANALYST	3
CASEWORKER	10
CLERICAL AIDE	1
CLERICAL ASSOC I	1
CLERICAL ASSOC II	39
CLERICAL ASSOC III	76
COMMUNITY ASSISTANT	2
COMMUNITY COORDINATOR	7
DEP DIR ADM M2	1
ELIG SPECIALIST II	26
ELIG SPECIALIST III	31
EXEC AGENCY COUNSEL M5	1
JOB OPPORTUNITY SPEC	1008
PRIN ADMIN ASSOC I	33
PRIN ADMIN ASSOC II	3
PRIN ADMIN ASSOC III	3
SECRETARY IIA	3
SECRETARY IIIA	10
SECRETARY IIIB	2
STAFF ANALYST I	1
STAFF ANALYST II	1
SUPERVISOR_I (SS)	2
SUPERVISOR_II (SS)	2
Total	1793

SNAP Staffing

SNAP Staff Count By Title	Sep-19
ADMIN JOB OPPTY SPEC [MGR]	2
ADMIN JOB OPPTY SPEC [NM]	1
ADMIN MANAGER	2
ADMIN MANAGER NON-MGL	24
ADMIN STAFF ANALYST	0

ADMIN STAFF ANALYST (NM)	1
ASSOC JOB OPPORTUNITY SPEC	2
ASSOC STAFF ANALYST	0
CLERICAL AIDE	1
CLERICAL ASSOC	100
COMMUNITY ASSISTANT	0
COMMUNITY COORDINATOR	1
DIRECTOR FOOD STAMP PROGRAM	0
ELIG SPECIALIST	811
HUMAN RESOURCES TECH	1
PRIN ADMIN ASSOC	301
SUMMER COLLEGE INTERN OTFT	0
Total	1246

Agency Findings: Staffing

In SNAP, the Family Independence Administration (FIA) continues to reallocate staff to meet the demands of clients, specifically moving staff from Home Center work as in-person traffic continues to decrease, to Telephone Interview Processing Services (TIPS), or phone centers, as clients shift from coming into Centers to calling us.

In addition, we are onboarding 322 staff in FIA to address attrition, including 25 Eligibility Specialists level 2 in the SNAP program and 200 JOS to address attrition in Job Centers.

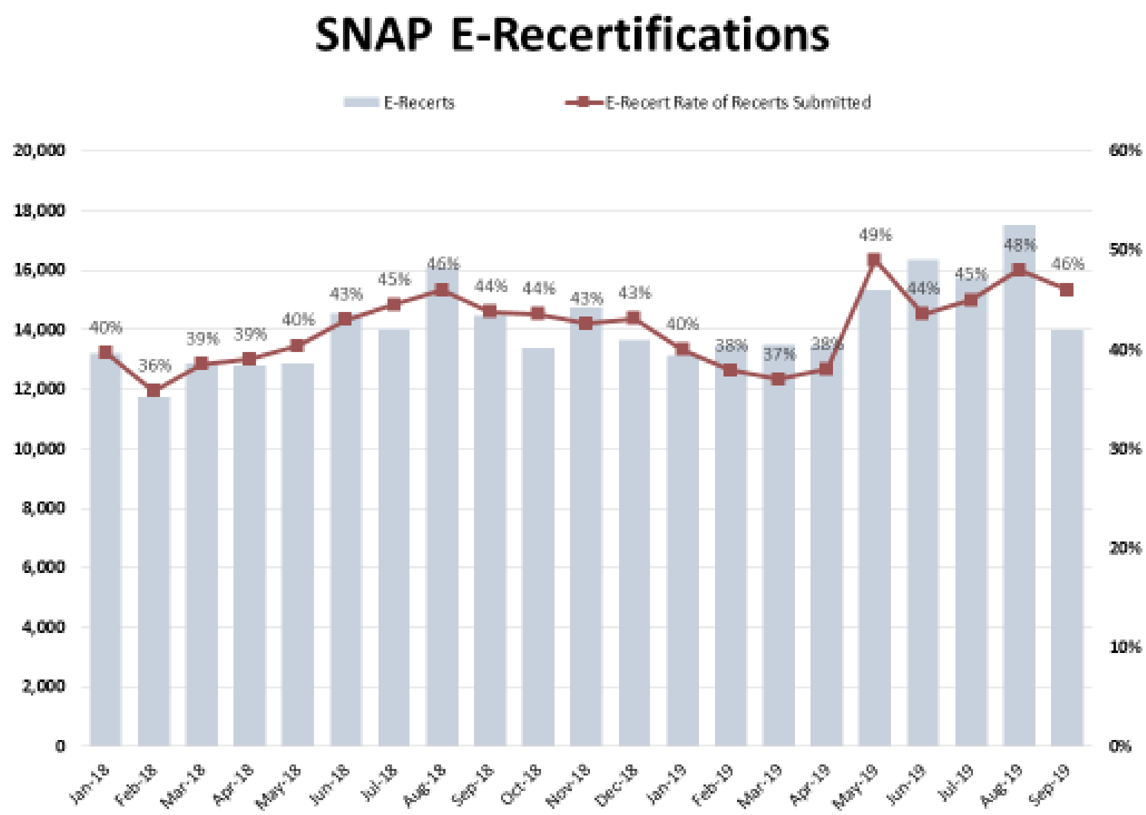
As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to:

10. ***The number of SNAP applications submitted through ACCESS HRA accounts or any similar successor technology;***

On average (Jan-Sep 19) 24,000 SNAP applications are submitted through ACCESS HRA monthly, accounting for about 90% of Sep 2019 submissions.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to:

11. The number of SNAP recertifications submitted through ACCESS HRA accounts or any similar successor technology;



NYC Human Resources Administration Department of Social Services

Agency Finding: On average (Jan-Sep 19) 43% of clients recertified using ACCESS HRA. This is due in part to the State sending a paper recertification form, prompting clients to complete the paper form rather than submitting their recertification online. We are encouraging clients to submit their recertification for SNAP online in several ways: messaging to clients in SNAP Home Centers that they can submit their recertification online, prompting clients to recertify online when logging on to AHRA during the recertification period, and sending clients text messages and emails with a link to ACCESS HRA to complete their recertification. We are also submitting a proposal to the State requesting approval for a demonstration project in Brooklyn where clients would only be sent a paper recertification form by the State if they request one or do not recertify initially through ACCESS HRA.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the department. This section is responsive to:

1. The number of on-demand telephone calls completed;

Agency Finding: Number of on-demand telephone calls completed in CY 2019: there were over 780,000 completed calls.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the department. This section is responsive to:

2. ***The efficiency and ease of use of the Department's phone lines;***

Job and SNAP Centers are required to perform a monthly audit of a sample of phones in the location. The audit is intended to measure/verify that staff is properly executing the instructions set forth in PD #12-26 OPE Voice Mail Protocol.

The Centers' audit is then re-verified by FIA's Office of Research and Program Monitoring (ORPM). Specifically, the audits verify that staff have the appropriate greeting on their voicemail, that the phone is answered or gives the option to leave a voicemail and the mailbox is not full, and that the staff member returns the voicemail within 36 hours. Each month a report is generated based on the findings and Centers take appropriate corrective action.

In addition, on a periodic basis, staff from the FIA Executive Deputy Commissioner's Office and Deputy Commissioner's Office call the published numbers for each Job and SNAP Center to ensure the correct number is published and answered, that the phone is answered or gives the option to leave a voicemail and the mailbox is not full, and that someone returns the voicemail.

For SNAP on-demand, wait-times specifically are monitored constantly throughout the course of the day, and adjustments to staffing levels are made as needed to try to keep the wait-time at a reasonable level, balanced with the need to make sure applications and recertifications are processed timely to ensure clients receive their SNAP benefits.

Agency Findings: efficiency and ease of use of the Department's phone lines

As stated earlier, FIA regularly rebalances staffing in SNAP to reallocate from Home Centers to TIPS as client needs shift. This rebalancing helps to ensure that on-demand calls are answered within reasonable timeframes.

In addition to the on-demand SNAP access, the Agency is investing in One Number, which will make it easier for all clients to get the information they need when calling regarding their Cash Assistance or SNAP case.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to:

3. ***Visitors' access to technology in Job Centers and SNAP Centers;***

The charts below show the technology available at each Job and SNAP Center (kiosk, self-service scanners, PC Banks).

SNAP Access to Technology

Location	Program	Borough	Address	Self Service Kiosks	Self Service Scanning	PC Bank
Hunts Point *****	SNAP	Bronx	845 Barretto St	No	Yes	Yes
Concourse **	SNAP	Bronx	1365 Jerome Ave	Yes	Yes	Yes
Crotona	Co-located	Bronx	1910 Monterey Ave	Yes	Yes	Yes
Queens	Co-located	Queens	32-20 Northern Blvd	Yes	Yes	Yes
Jamaica ****	Co-located	Queens	165-08 88th Ave	Yes	Yes	Yes
Rockaway	Co-located	Queens	219 Beach St	Yes	Yes	Yes
Richmond **	SNAP	Staten Island	201 Bay St	Yes	Yes	Yes
Coney Island	SNAP	Brooklyn	2865 W 8th St	Yes	Yes	Yes
Williamsburg	Co-located	Brooklyn	2 George St	Yes	Yes	Yes
East New York *	SNAP	Brooklyn	404 Pine St	Yes	Yes	Yes
Waverly ***	SNAP	Manhattan	12 W 14th St	Yes	Yes	Yes
East End	Co-located	Manhattan	2322 Third Ave	Yes	Yes	Yes
Washington Heights	Co-located	Manhattan	4055 10th Ave	Yes	Yes	Yes

* East New York HRA Express ended September 20, 2019

** Concourse and Richmond have 2 PC Banks in the same location - one for CA and one for SNAP

*** Waverly will get a full PC Bank when it re-locates to 109 E 16th Street in October 2021

**** Jamaica is piloting Special Grants for utilities at PC Bank

***** Kiosks at Hunts Point will be installed in 2020

In addition, the following technology is available to SNAP and Cash Assistance clients outside of our Centers:

- On-demand telephone SNAP application and recertification interviews Monday - Friday 8:30am – 5pm.
- IVRS SNAP recertifications 24 hours per day/7 days per week for select SNAP clients (based on current State approval: disabled or 55+, no earned income and no changes to unearned income/household composition/residence/rent level). In June 2020 based on State approval that we obtained, we will expand this to include those with only minor rent increases.
- Submit SNAP applications, recertifications, periodic reports and case change requests online via ACCESS HRA.
- Based on State approval, current Cash Assistance recipients may submit recertifications and special grant requests online via ACCESS HRA.
- Based on State approval, submit Cash Assistance applications at select CBOs in the community and select Job Centers (the State has just approved broader access subject to technical review by the State).
- Submit SNAP and Cash Assistance documents to the Agency via ACCESS HRA mobile document upload.

Agency Findings: Increased access to technology in Job Centers and SNAP Centers has been accompanied by site improvements and staff workload changes; clients are able to complete transactions with the agency from their homes and trusted community sites and with mobile devices, spending less time waiting in government offices or avoiding the need to come to an office in the first place.

This shift allows Center staff to focus on serving those clients that still need in-person services in our Centers and processing timely those requests we receive from online channels.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to:

4. ***Monthly reports submitted to the Commissioner of Social Services pursuant to subdivision c of section 21-142.2;***

All Inquiries Report by Rank 2014			
Inquiry Type	**Count**	**Percentage**	**Rank**
Food - Application S.I Status	8111	8.91%	1
SNAP - Application S.I Status	5610	6.16%	2
SNAP - No Telephone Interview	4916	5.40%	3
General Information	4082	4.48%	4
SNAP - Application Pending	3098	3.40%	5
Food - Skipped Benefit	2688	2.95%	6
Public Assistance - CA inquiry	2660	2.92%	7
SNAP - Skipped Benefit	2655	2.92%	8
SNAP - Application Status	2375	2.61%	9
SNAP - Recertification	2039	2.24%	10
Food - Case Closed	1896	2.08%	11
Accommodation Request - HVN	1800	1.98%	12
Food - Application Status	1676	1.84%	13
Food - Recertification	1669	1.83%	14
Fair Hearing - Agency Non-Compliance	1624	1.78%	15
SNAP - Case Closed	1611	1.77%	16
SNAP - Benefit Amount Inquiry	1533	1.68%	17
Food - Benefit Amount Inquiry	1448	1.59%	18
Public Assistance - Application Status	1407	1.55%	19
Medicaid - Benefits (MA)	1327	1.46%	20
Total	**54225**		
Grand Total	**90948**	**100%**	

All Inquiries Report by Rank 2019			
Inquiry Type	**Count**	**Percentage**	**Rank**
EIS - Medicaid Status Inquiry	56010	21.7%	1
SNAP - Application S.I Status	11999	4.65%	2
ACCESS HRA - Password problem	7203	2.79%	3

EIS - Coverage Update	5582	2.16%	4
SNAP - Skipped Benefit	5417	2.10%	5
ACCESS HRA - Please contact HRA Infoline	5372	2.08%	6
SNAP - Recertification	4668	1.81%	7
IDNYC - Card Status	4186	1.62%	8
SNAP - Benefit Amount Inquiry	3500	1.36%	9
Accommodation Request - RAR	3381	1.31%	10
SNAP - Case Closed	3356	1.30%	11
Medicaid - Benefits (MA)	3271	1.27%	12
MHL - Demographic Issue	3032	1.17%	13
Public Assistance - CA inquiry	2717	1.05%	14
EIS - Excess/Surplus Income Amount	2573	1%	15
EIS - Medicaid Status Request	2564	0.99%	16
ACCESS HRA - Other Technical Issue	2477	0.96%	17
Emergency Assistance - One-Shot (Rent)	2457	0.95%	18
Accommodation Complaint - HVN	2248	0.87%	19
SNAP - Benefit Issuance	2217	0.86%	20
Total	**134230**		
Grand Total	**257502**	**100%**	

- Beginning in mid-2014, the Agency began modernizing the way we track complaints, switching from a manual complaint process to a digital one, with more Agency divisions/departments participating in the same updated processes. In streamlining the complaint process and centralizing the complaint tracking into one system for the entire agency we have seen a notable increase between 2014 and 2019.
- In addition to modernizing systems across Agency divisions over the years and strengthening our data collection, tracking, and reporting, we have also significantly increased options through which clients can file complaints or request assistance. At the same time, we have significantly increased our outreach to clients regarding these options, resulting in greater transparency and accountability.
- To that end, reporting increases over the years have been driven by:
    - Assistance that we are providing to clients enrolled in the State's Medicaid Long-term Term Care (MLTC) plans despite the fact that HRA does not run the program – this accounts for roughly 20% of our calls;
    - More available options to log complaints and concerns;
    - Greater awareness of these resources;
    - Greater outreach to clients about methods of recourse; and
    - More effective, modernized systems for receiving, tracking, and resolving client inquiries.

As required by LL169 of 2019, the audit shall be limited to the data reasonably available to the Department. This section is responsive to:

5. ***Issues regarding operations, policies, and procedures at Job Centers and SNAP Centers raised by the organizations that have experience working with visitors; and***

See advocates recommendations below

6. ***Recommendations to address issues regarding operations, policies and procedures at Job Centers and SNAP Centers received from the organizations that have experience working with visitors.***

See advocates recommendations below

AGENCY RECOMMENDATIONS

No later than March 1, 2020, the Department shall post on the Department's website and submit to the mayor and the speaker of the council a report of the findings from such audit including the outcome of consultations with the organizations that have experience working with visitors conducted pursuant to subdivision b of this section.

Client Experience

On December 6, 2019, DSS/HRA met with the following organizations that have experience working with visitors to our Job Centers and Supplemental Nutrition Assistance Program (SNAP) Centers: The Legal Aid Society (LAS), City Bar Justice Center (CBJC), New York Legal Assistance Group (NYLAG), Urban Justice Center (UJC), Brooklyn Defender Services (BDS), Make the Road (MTR), Bronx Legal Services (BLS) and The Safety Net Activists (SNA). These organizations provided us with issues that they have identified and/or experienced relating to operations, policies, and procedures along with their recommendations on how the Agency can address these issues.

This audit meeting and feedback session with the advocates was an extension of a process the Agency has had in place since 2014, when we established work groups with advocate and client groups to help us develop and drive our reforms. These work groups have allowed us to hear suggestions on changes to operational processes and policies to better serve clients and to work collaboratively with advocates and clients to find ways to address the issues raised throughout the years. The feedback received in these work groups has created a meaningful metric against which the agency assesses service delivery, and policy and procedure soundness, in meeting client needs. From these work groups, we have developed new policies, procedures, forms, and trainings. We have developed ideas around regulatory changes and developed new operational functions to assist clients in having greater access to benefits. These work groups have also been a means by which to formulate reforms to reduce the number of administrative fair hearing challenges by clients who are aggrieved, which have decreased by 54% since 2014.

Below are the responses to the recommendations received[7] pursuant to paragraph 17 of subdivision b of Local Law 169. Of the over 70 recommendations received, we have already agreed to implement approximately 8 actions that are recommended; additionally, we are issuing reinforcing procedures to make sure our policies are followed in relation to approximately 17 recommendations, exploring the feasibility of approximately 20 of the recommendations, and working with the advocates to develop responses on approximately 30 of their recommendations[8].

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[7] Some of the recommendations received by the Agency relate to issues regarding our Investigation, Revenue and Enforcement Administration (IREA), which fall outside of the scope of this audit. However, we agree to continue a discussion about the issues raised within the context of our advocate work groups rather than within the context of this audit.

[8] Approximated numbers as some of the recommendations were either asked by multiple advocacy groups or were repeated/identical in nature in various sections of the recommendations

Many of the recommendations can be realized with Cash Assistance (CA) Reengineering, discussed in more detail below and for which we need State approvals. This reengineering will have a significant impact on a client's access to benefits and the overall client experience. Furthermore, since October 2019, we have been calling union hiring pools pursuant to the Civil Service Law to hire staff members in the Job Centers and the SNAP program, which will also address some of the recommendations. FIA is filling more than 200 vacancies in Job Centers and 25 Eligibility Specialist Level 2s in SNAP.

I. IN-CENTER ISSUES - CLIENT EXPERIENCES, PHYSICAL SPACE, TECHNOLOGY, AND OTHER CUSTOMER SERVICE ISSUES

A. Ticketing (kiosks and ticket accuracy)

Issue Raised by Advocates: HRA's reception area automated ticketing system is complex and confusing, not consistently staffed, and leads to many clients not being appropriately served. It also does not meet the needs of clients with multiple issues.

Advocate Recommendations:

- At check-in, each client should be clearly asked (1) "Why are you here? How can we help you today?; (2) told approximately how long it will take to be seen by HRA; and (3) told that if they are unable to stay, pursuant to HRA's policy, they can return to complete their appointment at another time. [LAS]

- Ensure that the Center intake/information desk has access to all types of appointments to correctly guide their right service location – with or without appointment notices. [UJC/SNA]

- Change kiosk options to include more options for the client to declare the purpose of their visit. This will prevent erroneous tickets from being printed, misdirection and longer wait times. [UJC/SNA]

- HRA should guarantee at least one HRA staffer who, at all times, will remain accessible to clients near the ticketing kiosks. The staffer will help orient clients with the system and ensure they get the appropriate ticket to address their expressed need that day. [LAS].

- Ensure that at least one staff member is always available at the kiosks to assist clients and ensure that they get the correct tickets. [UJC/SNA]

- HRA staffer should be responsible for ensuring that all of a client's needs are met in an efficient manner. [LAS]

- HRA should ensure these employees are appropriately trained to assist clients at the center: who do not speak a language that is available on the kiosk (including getting a translator); clients who are disabled; and clients who express discomfort or unwillingness to use the technology. [LAS]

- HRA should hire additional staff to cover the needs put forth in this recommendation. This request should not require moving current HRA workers from their current responsibilities of seeing clients, responding to calls, and/or processing applications, changes, or additional grants for cases, as this would only worsen wait times overall. [LAS]

- HRA should perform a review on a monthly basis to ensure that everyone who is routed to CSIC (Customer Service) received the correct ticket based on their expressed need (i.e. could the clerk have helped direct them to a more efficient ticket from the onset?). [LAS]

Agency Response:
Currently, the Agency is working to revise and improve the automated ticketing systems (kiosks). Extensive business requirements have been gathered to help redesign the system to help make the client's experience in coming to the Center more fluid and effective. These changes and ideas are going to be previewed for the advocates at various advocate meetings, and feedback will be elicited to make sure that as many client experiences as technologically feasible are captured in future iterations of the system. Moreover, it is anticipated that the kiosk redesign question set and logic will better route clients to appropriate areas and appointments to fit their needs and prevent instances of misdirection. The Agency will explore the development and use of a form that can be completed by clients in their own words and submitted to the worker to assist with routing to the appropriate area.

The Centers have assigned staff who monitor the kiosks and assist clients with questions. The employees who are assigned to helping clients at the kiosk are well-trained and knowledgeable staff members.

Also, in September 2019, ACCESS HRA was enhanced to allow active CA clients to submit their requests for assistance in paying rent and utility arrears and almost all other special grants online. On March 1, 2020, active CA clients also will be able to submit their requests for storage fees through ACCESS HRA online. This is important since it obviates the need for clients to have to come to the Center to submit their grant request(s). Once this new access channel is widely used, traffic in the Centers will decrease, allowing staff assigned to the kiosks more opportunity to help clients with the kiosk process and ensure clients get to the correct service area in the Center. This will also allow those clients who need to see a worker to experience shorter wait times. This initiative will help address the concern about clients receiving the correct ticket.

As we have reported previously, anti-bias and trauma-informed service provision training is being rolled out for all 17,000 employees of DSS/HRA/DHS. In addition, our training unit provides extensive training to staff at the Centers on the following topics in an effort to assist in meeting clients' needs and ensure meaningful access to benefits and services:

Language Access Training – All client-facing staff receive the Agency's Language Access Training every year. The training covers some basic facts about the

Department's client population, discusses language access laws and then goes into detail about how to provide free language services, including a discussion of bilingual staff, telephonic interpretation, on-site interpretation, sign language interpretation and written translation. The training covers Agency rules and regulations for when to access each service and the procedures for doing so. Staff are advised that they can always contact the Office of Refugee & Immigrant Affairs (ORIA) with any questions.

Disability Access Training – *Introduction to Disabilities: An overview of disability awareness, etiquette and culture* – A full-day training for Agency employees. Objectives include:

- **Exploring attitudes that can be barriers to working successfully with people with disabilities**
- **Understanding the Agency's and staff members' legal requirements regarding services for people with disabilities**
- **Identifying appropriate disability language**
- **Outlining the various types of disabilities Agency workers may encounter in their work**
- **Building appropriate skills to interact with people with disabilities**

Access for People with Disabilities Training – *Ensuring Success through Supervision* – A half-day training, designed to support supervisors of front-line staff in their ability to serve people with disabilities.

Introduction to Working with People with Disabilities Part I: The DSS/HRA/DHS New Hires Orientation Training – A half-day training for New Hires that is an adapted version of the Agency full-day training, mentioned above.

New Hires Training – The purpose of the training is to prepare newly hired Job Opportunity Specialists (JOS) and Eligibility Specialists (ES) with the tools needed to undertake their role in determining eligibility for the Cash Assistance and SNAP benefit programs. This training emphasizes the delivery of services while adhering to the Agency's standard of client service. The curriculum includes classroom training, hands-on experience with applicable systems, and on-site experiential days for all staff. These trainings are revised yearly to make sure that they are effective and comprehensive.

Client Service Training – The goal of the Client Service training is to give staff an understanding of different clients who seek services, examine client service expectations and introduce cultural structures required for effective client service. This training was designed to provide staff with techniques for good communication and interviewing skills to be used in the Centers.

De-escalation Training – *De-Escalation: Moving in the Right Direction* training focuses on the Agency's civility guidelines, and how to appropriately handle difficult

situations and challenging behaviors that staff may face in the workplace. Participants engage in learning activities that highlight scenarios staff are likely to encounter at DSS/HRA/DHS and promote adherence to Agency policies, procedures and safety guidelines.

Mental Health First Aid Training – *Mental Health First Aid* training is a groundbreaking public education program which introduces participants to risk factors and warning signs of mental health problems, builds understanding of their impact, and overviews common treatments. This one-day 7-hour certification course teaches non-mental health professionals how to give first aid to individuals experiencing a mental health crisis and/or who are in the early stages of a mental health disorder. This training is provided to the new hires during orientation and is offered to all other Department staff.

Supervisory Training for SNAP and Cash Assistance – This training provides Cash Assistance and SNAP Supervisors with a strong foundation of the knowledge and skills related to their job tasks. Supervisors are provided resource tools that highlight the specific rules and regulations in accordance with the Agency mandates.

Monthly Mandated Training – Mandated Monthly Training is provided to FIA Cash Assistance, SNAP, HIV/AIDS Services Administration (HASA), Homelessness Prevention Administration (HPA), and Ancillary Office staff to ensure staff are made aware of new and updated policies and procedures as required by City/State/Federal law, regulations, policies and guidelines. Monthly training also incorporates the reinforcement of basic eligibility rules to reduce payment errors and share best practices, in addition to agency-wide training needs and Center-specific needs for training.

Foundational Human Services Course– The *Foundational Human Services* course is a customized training solution developed by Hunter College for DSS/HRA/DHS to improve client service. It integrates core principles and best practices from social work into existing infrastructures for training, coaching, and professional development of front-line staff, supervisors, and directors to better enable them to meet their workplace needs as well as the needs of clients.

B. Ticketing - Generating a record of the reason for a client's visit / handling unscheduled visits.

Issue Raised by Advocates: If a client comes to the Center unannounced and does not have a clear and discrete issue to address (like addressing a sanction or completing recertification early/late), there is no permanent record of the fact that they came to the Center, the reason for their visit, or the outcome of that visit.

Advocate Recommendations:

- A client should be able to enter a reason for their visit in their own words and have a record generated in NYCWAY or elsewhere confirming their presence and purpose of their visit. HRA staff should assist clients at kiosks in entering, in their own words, why they are at the Center AND also enter their request in HRA terminology so each of the client's needs are met. [LAS]

- Local Law requires the Department of Social Services to create and issue a Job Center "appointment receipt" for all individuals who visit Job Centers for scheduled appointments. This practice should expand to all Center visits. [LAS]

Agency Response:

HRA Policy Bulletin #17-71-OPE sets forth the procedure to provide receipts to clients as confirmation of their visit to or contact with a Center. The form FIA-1173—Confirmation of Contact with Your Center is given to clients for both scheduled and unscheduled appointments or visits and can be provided for telephone contacts as well. We will retrain and reinforce with our staff that even if a receipt is not requested, one should be generated and provided. The Fair Hearing and Conferencing Unit (FH&C) will also be rolling out the use of a receipt to clients that will include their reason for the conference and the outcome.

As noted in this report, based on recommendations from the advocacy and client work groups and our own determination, there will be a kiosk redesign that will improve a client's experience at the Center. The agency will explore the development and use of a form that can be completed by clients in their own words and submitted to the worker for review to potentially facilitate routing. This form could also be scanned into the client's electronic record.

C. Failing to Treat Clients Holistically: Clients visiting the Center for two or more issues.

Issue Raised by Advocates: The ticket system is a regimented process that forces clients to essentially start over each time they need a different issue resolved. The client is forced to select only one ticket when they arrive. Only after they have been seen by the department assigned to that first ticket can they return to the kiosk, get an entirely new ticket and wait all over again for the next "department."

Advocate Recommendations:

- HRA should design a new system to treat clients with multiple issues in a holistic manner—regardless of the ticketing system used by HRA One. [LAS]
- If the ticketing system is used it should allow clients to get multiple tickets simultaneously upon entering the Center and people who receive multiple-issue ticket(s) should be directed on the order that is more efficient and not be "skipped" by any department while waiting for their first ticket issue to be addressed. [LAS]
- Ensure that kiosks have the ability to print tickets for those who need to address multiple issues. A client who needs to handle many issues at once should be placed in a queue that allows them to handle multiple issues, without having to go through a new waiting period each time. [UJC/SNA]
- The system should also enable caseworkers or customer service to generate a formal ticket if a new issue is identified while addressing client's primary issue. [LAS]

Agency Response:
The current Model Office Number Identification Queue (MONIQ) system, which is used by Centers to monitor tickets initiated at the kiosks, is designed to allow workers to generate a formal ticket for a different service area if a new issue is identified while addressing client's primary issue. For example, if an applicant for Cash Assistance also presents with a housing emergency during the initial application interview, the worker can issue a new ticket for the client to see the Homelessness Diversion Unit (HDU) without requiring the client to return to the kiosk and restart the entire check-in process.

As noted earlier, the Agency is revising the functionality and logic for how the ticketing kiosks function. It is being designed to be more user-friendly so that clients will be presented with more options to route themselves as they deem necessary based on their individual needs.

We understand the recommendation that all client matters be handled with one worker. However, the specialization of services is a very valuable way of delivering services to clients. Because of the many benefits that we provide to clients, it is important for them to meet with workers who have expertise with the specific benefit or service being sought. This is important so that we reduce both errors in the application process and multiple visits for the clients.

D. Document Submission

Issue Raised by Advocates: Documents are submitted multiple times because HRA says they were never received. Cases are closed without processing or reviewing documents submitted by clients. [MTR]
Advocate Recommendations:

- Ensure that constituents always receive document receipts. Systems have improved so that clients who use kiosks or the mobile application to submit documents get receipts automatically uploaded into their ACCESS HRA account and/or mailed to them (depending on their notification preferences). The HRA staff obligation to provide documentation receipts should be similarly enforced when constituents go to the center. [UJC/SNA]

Agency Response:
HRA Policy Bulletin #17-63-OPE outlines HRA's policy for workers to provide documentation receipts to clients. HRA Form EXP-76R, entitled "For Your Records: Documents We Received From You", was developed for this purpose. This document is created upon indexing of the submitted document. If client submits in person, they are given a copy at the Center. If the client utilizes the mobile application, fax, mail, self-service-scanner, or a CBO submission, the document will be mailed upon the successful commitment of the document to the client's electronic case record ("indexing") The policy bulletin also serves to remind staff that all documents submitted by a client must be accepted, scanned and indexed, and a receipt must be provided for them. This includes documents that may not meet an eligibility factor as well as those documents not specifically asked for by the Agency. The Agency will reinforce the requirements of our policy and will continue to explore any concerns regarding document receipts with the advocates at our

regular meetings.

E. <u>Waiting rooms and lines to get into Centers are not managed and the physical layout of Centers does not accommodate client volume or rate of traffic.</u>

<u>Issue Raised by Advocates</u>: HRA does not have management-level personnel present to manage the lines to enter Centers and Center waiting rooms. Because of this, clients instead turn to the Security Guards, which leads to misinformation, and may lead to escalated conflict between clients and security.

In addition, waiting areas do not accommodate client volume or rate of traffic. Centers do not have space or seating to serve expected numbers of clients with expected wait times. Security guards and other personnel are not sensitive to the needs of clients who want or need to sit or rest when in waiting rooms for any period of time, short or long.

<u>Advocate Recommendations</u>:
- Ensure that at least one staff member is always available in the waiting room to answer questions from clients and ensure that security is not answering client's questions and concerns. [UJC/SNA]
- HRA should hire additional management-level staff to be full-time in the waiting rooms and manage the lines to enter the Centers and Center waiting rooms. These managers will oversee these critical HRA entry points, answer client questions, resolve emergencies, ensure that clients are triaged appropriately and are given the appropriate ticket to address their expressed need that day. Note: this is a core management job function. HRA will not include this responsibility in the job description for the newly hired Social Workers required by Local Law. The HRA managers assigned to be present in the waiting rooms should be able to access the Social Worker when an emergent situation requires social intervention. [LAS]
- HRA should ensure each Waiting Room Manager is trained in de-escalation and trauma-informed service provision. [LAS]
- HRA should train security guards to be sensitive to needs, in terms of physical waiting space, of expected clients and how to deal with high volumes of clients in constrained spaces. [LAS]
- HRA should train Center staff to be responsive to clients who report difficulty dealing, mentally or physically, with existing waiting spaces. [LAS]
- Each center should have a plan in place to address lines so that no one has to wait outdoors and to enable individuals to be seated. [LAS]
- Improve the quality of waiting areas (more comfortable seating) and volume of seating and open spaces to wait, in addition to the proposed children's spaces. If possible, use spaces with natural light, high ceilings, and open formats for waiting areas for clients. [LAS]

<u>Agency Response</u>:
The Agency currently has a procedure that requires managers to consistently do a sweep of waiting areas set forth in Policy Bulletin #99-20—Reminder of the Sweeps Procedure. We recently retrained on this procedure and require Center management to make sure that this procedure is being enforced in the Centers. We are also in the process of updating this procedure and welcome the advocates' feedback and

concerns regarding this procedure. We will work on this procedure with the advocates during our regular meetings.

Additionally, the Agency is in the process of training all its managers on the techniques of de-escalation. The Office of Policy, Procedures, and Training (OPPT) has developed a comprehensive training for managers in order to ensure that they are aware of their obligations and that they are given necessary training in techniques to help de-escalate situations with clients and incorporate trauma-informed approaches into their interactions with clients.

Furthermore, all staff are required to receive client service training which also includes de-escalation and trauma-informed theory. Staff have also been trained, as it is Agency procedure, to identify and offer reasonable accommodations, when feasible, even before a client is formally interviewed, including in waiting areas. The Agency agrees that this is an important issue on which we will provide refresher training.

F. Clients are turned away from Centers - verbal denials and deterrence.

Issue Raised by Advocates: Verbal denials and deterrence - clients are told they cannot apply for certain benefits or assistance, have to visit a different Center, have to request a hearing, or have to wait for a fair hearing.

Advocate Recommendations:
- Each client who appears at a Center should be given a record of the request a client has made and provided the ability to see a supervisor if this request is denied. [LAS]

Agency Response:
Since 2014 the Agency has made every effort to make sure that fair hearing requests are reviewed for a possible resolution before the hearing date. We have also worked closely with the advocates to implement changes within operations to decrease the need for fair hearings. This has included looking at existing procedures, the generation of notices, and other operational and systemic workflows. This collaboration has been successful, and we have seen a 54% decrease in the number of fair hearings requested since this joint work began in 2014.

We are required to take applications from clients at all locations that are designated to accept applications. Staff are trained not to deter or dissuade a client from applying for a benefit. There are also very few instances in which a fair hearing should be used as a vehicle to resolve a problem with a case. Recipients, however, do need to go to their assigned Center for their cases unless there are extenuating circumstances. However, if they so choose, recipients may now submit requests for additional allowances/special grants online on ACCESS HRA without having to come to a Center. For special grants, all active clients receive a copy of the W-137A (Request for Additional Allowance) form either via mail or in-person, depending on the method of submission. The Agency will reinforce its policy that there is no wrong door for clients in accessing benefits and will continue to discuss this issue with the advocates during

our regular meetings.

G. Wait time(s) information for clients

Issue Raised by Advocates: Clients have no way of knowing the average wait time when they arrive to a Center.

Advocate Recommendations:
- HRA should design a system in 2020 that enables clients to get, at a minimum, an average expectation of the wait times in the Centers for each ticket type/department. [LAS]
- Create a system/utilize software that measures how long the waiting time is at the center and post the estimated wait times in reception, updating as the wait times change. Post the wait times for the other welfare centers that are nearest to that particular office, since people with emergencies may apply at any center. Prominently display real time wait times on HRA's Website so that a/r (with internet access) can make informed decisions before going to Centers. HRA can post the average wait times from JobStat in each Center in the event HRA is unable to create a system that measures current wait times and adjust wait times. [BLS]
- HRA should experiment with electronic ticketing options and other options that allow a/r to step out for minutes or more to address life issues without fear of forfeiting their place in line. Electronic ticketing options include things like a coaster that illuminates when someone is being called. [BLS]
- Ensure that total wait times to meet with HRA staff members and supervisors are under one hour for the vast majority of Job and SNAP Center visits. [UJC/SNA]
- All HRA Centers should have a maximum wait time that should be prominently displayed. In the event that a/r have waits that exceed those maximum wait times, they should have the option of speaking with someone who can give them the option to reschedule them for another appointment at a time and date certain. [BLS]

Agency Response:
It would be difficult for the Agency to predict the wait time that a client will experience in the Center on any particular day, particularly given the emergency nature of some client needs. Therefore, there is no way to predict how long each ticket will take to complete. There is no average time that can be calculated for each ticket since each case varies in terms of complexity and the urgency of needs. Also, there are different tickets depending on the service required and therefore there will be different wait times for each type of ticket.

However, the Agency is exploring the feasibility of providing information on its website about when Centers tend to be the busiest and when wait times might be highest, which could be updated at regular intervals as trends change over time. The Agency will consider the feasibility of introducing electronic coasters and other electronic ticketing options and will continue to discuss this issue with the advocates during our regular meetings.

The Agency is fully committed to reducing client wait times and streamlining services to ensure that clients have easy access to the benefits they need. For this reason, the Agency has been investing in technology to simplify processes and requirements to

better serve clients – and will continue to do so. HRA has made significant progress towards streamlining and modernizing services for SNAP clients and we are seeking to follow the same strategy for our Cash Assistance program. By leveraging much of the technology used to improve SNAP services, the Agency will enhance the CA client experience at its Job Centers. The Agency has already begun to do this by taking steps to allow CA clients to submit their recertification forms electronically and ensure that important information such as appointment dates/times, benefit balances, and HRA notices are available online through our ACCESS HRA website and mobile application.

Additionally, with State approval, Cash Assistance recipients can now request emergency grants such as assistance with rent or utility arrears online using ACCESS HRA and, recently, we have added PC banks with online CA application capability in our Job Centers. By providing a more self-directed service model through the use of the ACCESS HRA Web Portal, the ACCESS HRA Mobile App, and the NYC HRA Mobile Document Upload tool, clients have an alternative to visiting our Centers and waiting for in-person service – they can now complete many transactions from the convenience of their home or any location in the community with internet access using a smartphone, tablet, or computer. These innovations free up Job Center staff to focus on vulnerable clients in need of extra intervention and support. We believe that as clients become more comfortable with ACCESS HRA and its mobile app, in-person Center visits will gradually decline, and, in turn, wait times to see workers will be minimized.

There will be an expansion of case information available to Cash Assistance clients over the telephone through One Number as discussed further in section H – which will reduce the need to come to an office to get basic information.

Our vision for the Cash Assistance program is to transition from using only Face-to-Face interviews to access to telephone interviews. Since this is subject to State approval, the first steps of implementation are currently under discussion with our State oversight agency.

H. Long wait times to reschedule appointments

Issue Raised by Advocates: Clients go into their Centers to reschedule mandatory appointments (both Center-based appointments and vendor appointments that are assigned at the Centers), increasing overall Center wait times.

Advocate Recommendations:

- HRA should analyze this problem and resolve any barriers that prevent individuals from rescheduling appointments by telephone or online. [LAS]
- HRA should create a new ticketing system specifically for appointment rescheduling (that encompasses all types of appointments which may be given out at a HRA Job or SNAP Center). [LAS]

- HRA should hire additional staff to cover the needs put forth in this recommendation. [LAS]
- HRA should create an “express line” at Job Centers that is designated for specific issues, which should include providing documents such as change of income/pay stubs. The express line could include rapid assessment of emergency issues. Compare wait times before and after implementation of the express line. [BLS]

Agency Response:
As part of the kiosk system redevelopment the Agency can look to add a ticket to direct clients to reschedule appointments, this ticketing can potentially be handled quickly and without having to wait on the general client service lines. The Agency will analyze this problem and come up with solutions to resolve barriers that prevent individuals from re-scheduling appointments in the Center, by telephone or online. However, we will seek to serve clients already in the Center rather than rescheduling them for another visit, wherever possible.

Furthermore, the implementation of the One Number technology next year will assist in ameliorating this issue. Infoline will become the central telephone contact for HRA clients through a single contact number and entry point. The goal is to offer New Yorkers easier ways to interact with HRA through technology and alleviate wait time in centers. Multiple Interactive Voice Response System (IVRS) applications will be streamlined and integrated into one system and one number for clients and stakeholders to call to maximize resources and improve client service. The One Number IVRS will be redesigned to more closely align with leading practices, improve efficiency, and incorporate speech recognition.

The new One Number IVRS will:

- **Provide directed dialogue capabilities so that callers can respond to questions with keywords to reach the information they need quickly.**
- **Enable routing and internal transfers based on agent skill set, enabling callers to reach the agents with the right expertise with minimal disruption.**
- **Provide self-service options supported by web service integrations with HRA systems to allow callers to check case status and benefit information, request documents, reschedule appointments, and carry out other common interactions.**
- **Offer the option to hold a caller’s place in the queue and automatically call them back when an agent becomes available.**
- **Allow for call recording, listening, and archiving in support of the Agency’s management and program accountability needs.**
- **Provide robust reporting to enable ongoing management and planning around agent staffing, content refinement, bandwidth needs, and other ongoing operational and strategic considerations.**

I. Worker accountability

Issue Raised by Advocates: Clients are not always aware of what employees they are interacting with at centers, particularly when a client is interacting with an employee who is not at their desk/cubicle so there is no worker identification in sight. This creates accountability issues when clients treated disrespectfully, or when a worker expresses biases and/or are uses language that is racist, sexist, homophobic, or otherwise problematic.

Advocate Recommendations:

- HRA should require their employees to wear name tags to identify themselves with, at a minimum, a last name. [LAS]
- Hire Peer Specialists to improve support for particularly vulnerable clients. The Peer Support model trains individuals with lived experience to provide practical, social, and emotional support and advocacy assistance to individuals dealing with particular systems or challenges. It has been studied and proven to improve outcomes in human services. Peer Specialists undergo formal training to provide support to those who can benefit from their experience. The Veterans Administration (VA) Health System is a well-established model, and the services that Peer Specialists provide can be reimbursed through Medicaid and other payer systems. HRA recipients with significant challenges would benefit from being able to work with a Peer Specialist to assist them in the complex and difficult PA application and ongoing eligibility processes. [UJC/SNA]
- Contract with local CBOs to act as an in-person ombudsman in every Center. The CBOs will meet with applicants/recipients, evaluate their questions/concerns, give brief advice, and act as a liaison to Center supervisors as well as Constituent Affairs. This will allow issues to be investigated and addressed in a more efficient and timely manner and will provide access to an ombudsman to individuals who would not have otherwise had access. (Otherwise, establish a dedicated OCS contact for advocates at each Center. Dedicated contact will liaise between advocates and center staff to address issues.
- Concerns should be tracked and used to inform supervision, training, program development and other needs. [BLS]
    - Data: The CBO/ombudsman could collect a number of data points including: number of A/Rs they meet with, the type of access issues they are seeing, the outcome of each A/Rs case, and the timeframe it took to resolve the issue. [BLS]

Agency Response:

The Agency requires staff to display their names at their workstations and to wear their employee identification badges at all times. We will reinforce these requirements.

Although the Peer Specialist recommendation is something we will explore, there are Civil Service limitations that may preclude our ability to implement this.

There are significant Social Services Law limitations on access to our offices by persons who are not clients. We will discuss these concerns in our advocate work groups.

J. Cell Phones

Issue Raised by Advocates: Current policy does not recognize the critical role that cell phones play in the lives of many applicants/recipients.

Advocate Recommendations:

- Remove all "no cell phone" signs in Job Centers. Adopt and post a policy that permits the use of cell phones in reception but asks, if HRA insists, that individuals take voice calls in the hallways or just outside of reception. [BLS]
- Provide free Wi-Fi in centers. [BLS]
- Consider providing charging stations. [BLS]
- In the alternative, allow people to charge their phones rather than enforcing a policy that applicants/recipients cannot use any HRA plugs during their visits. [BLS]

Agency Response:

The Agency recognizes the critical role that cell phones play in everyday lives. HRA changed its cell phone charging policy in April of 2016. We do permit clients to charge phones in client waiting areas but ask that cellphones be charged close to the outlets to avoid the danger of someone tripping. We will explore further the recommendations regarding this issue, such as WiFi access. We are exploring increasing the charging capabilities at our Centers. Initially, GSS will be switching out outlets in the client waiting areas for combination outlet/chargers and pilot a charging station at a location in the Bronx.

There should not be any notices in the Centers that bar clients from using their cell phones. We will reinforce this with staff. There are, however, notices in the Centers that prohibit clients or visitors from taking pictures or videos in the Centers or using cell phones in certain confidential areas, such as designated interview areas, in order to protect the privacy of other clients within the Centers, including survivors of domestic violence, persons with HIV, immigrants who may be fearful of seeking help in the current anti-immigrant environment, and clients who do not want others to know that they are receiving government assistance.

K. Office Hours and Times

Advocate Recommendations:

- All Centers should have regular, fixed hours that extend into the evening and include at least one weekend day. HRA should consider selecting the evening hours on the day that coincides with the borough's late Housing Court day. (For example, in the Bronx, Housing Court is open in the evenings on Thursdays. [BLS]
- Stagger lunch hour breaks across different job descriptions to ensure more consistent operation of the centers. Consider experimenting with a different model by closing a Job Center for a fixed lunch hour (though not ejecting people from the waiting room), similar to how the NYS/NYC courts operate. [BLS]
    - Data: Track data across centers to see if wait times are reduced. If operating one Center that is closed during the lunch hour, compare the wait time of that Center with other Centers. [BLS]

Agency Response:

We believe that CA Reengineering is the path forward and we are working to move the Cash Assistance program model to mirror SNAP so that in the future many

transactions can be completed online at a client's convenience without having to come into an office.

The Agency makes every effort to ensure clients receive the in-person services they need with the shortest wait time possible. We have analyzed and considered various models for Center operations in an effort to better serve clients, and to reduce wait times or any delays in service. Part of the evaluation that we undertook and continue to undertake is looking at our Centers and how they operate. We shift staff and work within the Center to accommodate the daily volume of clients who come to the Center for assistance with or without appointments. We currently already operate our Centers on overtime that extends well past the 5pm closing time. We also stagger staff lunch hours to make sure that the Centers have coverage. We re-adjust staff schedules to ensure core hours are when client demand in-center is highest. We try to complete as many processing/non-client-facing activities as possible during less busy times in Centers, including shifting processing activities to weekends to allow for those staff to address in-center client demand during weekdays. However, we will explore and consider the recommendation to close the Centers for an hour during lunch, similar to the NY courts, and determine the operational feasibility.

HRA has spent significant time and resources determining the best way to meet clients' needs regarding access to benefits. In doing so, we focused on enhancing the number of things that clients can do through ACCESS HRA 24 hours per day, 7 days per week, and allowing individuals to submit applications for Cash Assistance at non-traditional sites like 14 approved CBOs throughout the city in a State-approved pilot that we have now been authorized to expand, and through an Agency representative at housing court. The goal in doing this is to reduce the number of people who must come to the Center for services and allow the Center staff to focus their time on assisting those who have more complicated service needs.

L. Computer Systems

Issue Raised by Advocates: Often, long waits at the Job and SNAP Centers are a result of systems being down or other technological issues. Further, staff often cannot easily see all appointments, information, and documents regarding a case without significant expertise and looking at information in several different systems on many different screens. Additionally, recipients are sometimes told that their benefits didn't go through due to systems errors. Finally, when HRA does provide clients with printouts about their benefits at the center or at fair hearings, the printouts are confusing and difficult to read.

Advocate Recommendations:

- Overhaul HRA's internal computer system. We recommend that HRA undergo a comprehensive overhaul to put in place a new computer system that functions well, does not crash, and is easy to use for both workers and recipients. While it would be a tremendous undertaking, we believe that a full system overhaul would offer huge benefits to HRA staff and recipients. [UJC SNA]

- Create, modify, or enhance a centralized system that lists and tracks all HRA-related appointments. Current systems show some appointments, but not other appointments. [UJC SNA]
- ACCESS HRA's appointment section must correspond – in real time if capable – with appointments contained in HRA's in-house network systems. [UJC SNA]

Agency Response:
On an ongoing basis, the Agency is reviewing it's systems to improve their functionality, and streamline processes in order to gain efficiencies to better serve clients.

The State is endeavoring to revamp and expand the Welfare Management System (WMS) through a project known as IES (Integrated Eligibility System). It is anticipated that some of the City's current computer systems will be taken over by the functionality of this new State system. In the meantime, the Agency is constantly redesigning and improving its computer systems to enhance their ability to support the various programs administered by the Agency and improve client experience.

ACCESS HRA has incorporated many Agency appointments into the system. We will review whether there are appointments that are not currently reflected and explore the possibility of incorporating them, as well as the possibility of real-time systems updates in relation to appointments.

M. Feedback on Experiences and Noncompliance at Job and SNAP Centers

Advocate Recommendations:
- An independent group should be allowed to visit centers and write a report regarding their experiences. These reports should be seriously considered to assess whether applicants'/recipients' needs are being appropriately met. [BLS]
- Whenever an instance of noncompliance is identified (or when a CBO recommendation here echoes an existing HRA policy that may not be adequately enforced), establish a committee to investigate and address the reasons for noncompliance. [BLS]
- HRA should have borough-level town halls open to the public, particularly for PA applicants/recipients to give a direct voice to their concerns, ideas, and suggestions. [BLS]

Agency Response:
We value feedback and partnerships, and for that reason, established workgroups with advocates, many of which involve clients.

We also have the Office of Constituent Services (OCS) to field inquiries and complaints received from clients. Senior management reviews those inquiries and complaints to identify potential issues requiring change or noteworthy trends that may require attention. We are now mandated by Local Law 171 of 2019 to report on comments, questions, and complaints received through OCS.

We will explore additional ways to obtain community-level feedback.

As noted above, there are significant Social Services Law limitations on access to our offices by persons who are not clients. We will discuss these concerns in our advocate work groups.

N. DV/DVLs/special assessment

Issue Raised by Advocates: Using the LDSS-4583 as the primary means of sweeping people into DV waiver or other DV-related services has failed. Although OTDA and HRA recognize that over 50% of cis-women who receive public assistance benefits may be survivors of DV, only around 3% of all adult CA recipients have a DV waiver. In 2015, 100% of the homicide victims of intimate partner violence had prior contact with HRA in the 12 months before their deaths. Center staff are not appropriately screening survivor applicants for DVL services. The purpose and scope of the DVL program is not adequately and/or consistently explained to applicants. Center staff do not consistently follow protocol and make judgments not to refer applicants who do not fit the staff's concept of "victims."

Examples Provided by Advocates:

- Applicant is asked, "Are you a victim of domestic violence?" Not all who experience violence identify as such, particularly in a situation as stressful as applying for public benefits. Once an a/r denies that they are experiencing domestic violence, there is no follow up.
- Despite clear directives to the contrary, a/r are expected to have recent, physical instances of DV to merit a DV waiver.

Advocate Recommendation:

- Using feedback from CBOs, social workers should collaborate with expert domestic violence service providers to create a script (or modify existing scripts) explaining the purpose and scope of the DVL program. Require that this script be read to all applicants.

Agency Response:

Details on the Domestic Violence process are outlined in Policy Directive #19-08-OPE entitled "Domestic Violence Program." At the application/recertification interview in the Job Centers, workers are required to read the script found in the Desk Reference for Domestic Violence Screening Under the Family Violence Option (LDSS-4813) to all applicants/recipients. The LDSS-4813 was developed by NYS Office of Temporary and Disability Assistance (OTDA) in conjunction with the NYS Office of Children and Family Services (OCFS), the NYS Office for the Prevention of Domestic Violence, and the Professional Development Program, Rockefeller College, University at Albany. Moreover, workers are mandated by State regulations and policy to screen for Domestic Violence using a screening form developed in consultation with the Office for Prevention of Domestic Violence and statewide domestic violence advocacy groups. See 18 NYCRR 351.2(1)(4)(i). The Form LDSS-4583 was developed for this purpose and we are required to use it to determine whether an applicant/recipient should be referred to a DVL. See 98 ADM-03, "Domestic Violence: Family Violence Option under the Welfare Reform Act of 1997" (Page 6-7). The LDSS-4583 Form is part of the CA Application and Recertification Kit as well as the SNAP Recertification Kit. Completion of the LDSS-4583 is voluntary.

The Agency will re-train staff on the process requiring use of these State forms. We also will discuss with the advocates during our ongoing DV work group possible changes to the form, with the caveat that any changes would require State approval.

Advocate Recommendations:
○ Center staff should provide a list of possible experiences of abuse to applicant and allow them to identify if any of them fit (e.g., -Has your partner ever hurt you? -Has your partner ever threatened to hurt you? -Has your partner every threatened to hurt your children or pets? -Does your partner control your finances? -Does your partner demean you?, etc.).
○ Using feedback from CBOs, social workers should collaborate with domestic violence service providers to create an informational flyer that must be provided to all A/R in their language of choice at time of script reading.
○ Flyer should:

- Clearly define the role of the DVL and the potential benefits of meeting with one.
- Clearly list of HRA requirements and processes that may pose risk for victims of DV/available waivers
    - E.g.: "If complying with any HRA requirements may put you or your family in danger, you have the right to speak to a domestic violence liaison (DVL), who may be able to exempt you from certain requirements or modify the way you receive HRA services.
- Explain that HRA's application process may include:
    - Sending you notices in the mail
    - Seeking or enforcing child support payments
    - Contacting the parent of your child
    - Visits to your home

Agency Response:
NYS OTDA and NYS OCFS developed an informational brochure entitled "Information About Temporary Assistance for Victims of Domestic Violence" iPub. 5209 (10/2019). The flyer defines the role of the DVL and potential benefits of meeting with one. It also explains that if CA requirements put the client or client's child at risk or in danger, the client can speak with the DVL to see if the CA requirements may be addressed at a later date.

We will discuss with the advocates during our ongoing DV work group possible changes to the brochure, with the caveat that any changes would require State approval. Moreover, in the work group, we will explore adding this brochure to our application and recertification kits.

Advocate Recommendation:
● Require that all CMU and front-line staff complete ongoing training on domestic violence, trauma-informed care, and cultural sensitivity offered by CBOs and/or expert domestic violence service provider.

Agency Response:
Center staff receive training on domestic violence as part of new hire training and these trainings are reinforced during our monthly center-based trainings. The training

provides the worker with an understanding of what domestic violence is, the forms it may take, and the effects it may have on a survivor. They are also provided with information on how to provide the appropriate resources to clients and are trained on how and when to make a referral to our Domestic Violence Liaison.

Office of Domestic Violence staff also receive the following trainings:

HRA OCSS/DVL Training
For this training, the HRA Office of Child Support Services (OCSS) and Office of Domestic Violence (ODV) provide an overview of the child support process, including the cooperation requirements and waiver process. Additionally, the training covers what an opt-in waiver means and what participation with the child support process entails for the OCSS program and the Family Court, and what safety planning options there are to safely seek support.

Annual DVL training

This is a three-day training mandated annually by the State and is upcoming in August 2020. The Domestic Violence Liaison Training (DVTL) Institute is designed for Domestic Violence Liaisons employed by, or under contract with, local social services agencies within New York State. Institute training is provided in collaboration with the Professional Development Program, Rockefeller College, University at Albany. This training provides the required knowledge and skills necessary for the Domestic Violence Liaison to fulfill their role of assessing client claims of domestic violence, granting waivers from CA requirements and referring clients to needed services. The Institute's three-day training format utilizes a combination of classroom and computer assisted instruction, group activities, and skill practices, to provide their Domestic Violence Liaison with an in-depth understanding of Domestic Violence and Cash Assistance program requirements, as well as a working knowledge of the waiver process.

IPV 101 Training
This training is provided to staff as part of New Hires training and offered throughout the year by the Mayor's Office to End Domestic and Gender Based Violence (EndGBV). The training defines and provides an in-depth overview of intimate partner violence.

ENDGBV Training
This training is conducted by the Mayor's Office. The training covers trauma-informed interviewing, provides an overall understanding of how trauma effects the brain, and teaches best practices for interviewing survivors of trauma.

Advocate Recommendation:

- Center staff should reevaluate recipients for DV at recertifications.

Agency Response:
Center staff evaluate clients for DV at application, recertification, at the expiration of a waiver or exemption, and at any time the client requests.

Advocate Recommendation:

● HRA notices (particularly those placing a work or OCSE sanction) should include language that if an A/R is experiencing abuse that would interfere with their ability to comply with Agency requirements, they can request to speak with someone. For example, include the following language on notices: "If complying with any HRA requirements may put you or your family in danger, you have the right to speak to someone who may be able to exempt you from certain public assistance requirements, such as child support cooperation."

Agency Response:

Both the Employment Sanction Notice and the OCSS Sanction Notice are sent by the State through CNS. Any changes to these notices would need State approval. However, we will discuss this recommendation further with the advocates during the DV work group and request that the State make changes to the notice language.

Please note, however, that the OCSS CNS Sanction Notice contains language explaining that good reasons for not cooperating with OCSS include "fear of emotional or physical harm to you or the children in your family" or "the child was born due to rape or incest."

Advocate Recommendation:

● A/R who are referred for special assessment should receive intensive short-term case management services from trained Social Workers. See also *Section III - Social workers in centers.*

Agency Response:

The Agency DVLs develop safety plans for clients and provide clients with community referrals or links to non-residential services. These referrals or links are made to agencies or providers who are specialized and trained to provide DV or other related services to meet the clients' needs.

Advocate Recommended Data/Reporting**:**

● Track the total number of applicants and total number of intake worker-to-DVL referrals at center and worker levels.

● Track the total number of A/R who are referred to the DVL for special assessment at center and worker levels

● Track the total number A/R who are approved for DV waivers at center and worker levels

● Analyze data and report information quarterly. Use reporting to inform training, staffing, oversight and other needs. See also *Section X-Accountability*.

● Create avenues for receiving feedback from CBOs and applicants regarding waiver system

● Create a protocol for investigating and responding to complaints that includes assessing for and meeting training, staffing, oversight and other needs.

● Publish on HRA's Website for each job center: DV waivers (or special assessment) granted & denied; total referrals for special assessment.

● Share data with ENDGBV

● Employ a "secret shopper" who presents as a DV survivor without identifying as one in the LDSS-4583

Agency Response:
The Agency will continue collaborating with advocates during the ongoing DV work group. We will use this forum to hear feedback regarding the waiver system. Moreover, we will discuss and establish during the DV work group a new protocol for investigating and responding to complaints.

Issue Raised by Advocates**:** Domestic Violence Liaisons are not conducting meetings in trauma-informed, culturally-sensitive ways. Applicants/Recipients are shamed for their choices and act on good victim/bad victim stereotypes.

Examples Provided by Advocates**:**
- Recipient's request for renewal of her waiver was denied because she had not deleted her Instagram account, which the DVL had advised previously as a means to avoid her abuser.
- Recipient included note from her psychologist attesting to her need for a waiver. DVL referred recipient to WeCARE for waiver because "medical comes first." WeCARE referred recipient back to DVL because "domestic violence comes first." DVL refused to assess recipient for waiver after she was referred back.
- Recipient informed by DVL that she would need a police report in order to substantiate her claim of abuse.

Agency Response:
The examples provided are not representative of agency policy and mandates and we will provide reinforcement training to address the concerns that have been raised. We will also look into the cases in more detail to find out what happened and take further action beyond the reinforcement training if we are provided with identifying information.

Advocate Recommendations:
- Domestic Violence Liaisons should be supervised by Licensed Clinical Social Workers (LCSW-Rs). When an A/R requests to speak with a supervisor, they should speak with an LCSW-R.
- DVL hiring process should include people with prior experience working with survivors of violence.
- Domestic Violence Liaisons should complete ongoing training on trauma-informed care and cultural sensitivity offered by CBOs and nonprofit organizations that work with survivors
- DVLs should be tested regularly on their knowledge of HRA's DV screening protocol and tenets of trauma-informed care and cultural sensitivity.

Agency Response:
While the State only requires DVLs to be caseworkers, the Agency hires Social Workers for the DVL position out of Civil Service Pools. The Civil Service rules do not allow for there to be regular testing of workers. There is currently no selective certification for this position that would take into account prior experience working with survivors of violence. DVLs receive training on trauma-informed care and cultural sensitivity as described above. As social workers, DVLs are required to participate in 36 hours of Continuing Education over 36 months.

Advocate Recommended Data/Reporting:

- Track and analyze the number of referrals to each DVL and the number of waivers granted by each DVL to identify DVLs with low rates of waiver approval. Establish schedule for regular review of this information. Create a protocol for investigating and responding to data issues that includes assessing for training, staffing, oversight and other needs. Regularly share the data with ENDGBV and publish on HRA's Website.
- Create avenues for receiving feedback from CBOs and applicants regarding waiver system
- Create a protocol for investigating and responding to complaints that includes assessing for and meeting training, staffing, oversight and other needs.
- Track training completion and training assessment data for all DVLs. Develop contingency plan for DVLs who fail to complete required trainings or fail to pass assessments that ensures DVLs with inadequate training will not be screening clients for domestic violence.

Agency Response:
The Agency will continue collaborating with advocates during the ongoing DV work group. We will use this forum to hear feedback regarding the waiver system. Moreover, we will discuss and establish during the DV work group a protocol for investigating and responding to complaints.

Issue Raised by Advocates: DVLs are not available when needed. Applicants receive Special Assessment referrals after the initial application date. While extra appointments are difficult for most a/r, survivors of domestic violence often have more difficulties making repeat appointments.

Advocate Recommendation:

- Increase staff numbers to ensure DVL available at every site during all hours of operation. Ensure that all those referred for Special Assessment are able to meet with a DVL that day but allow them to reschedule for later if they so choose.

Agency Response:
The Agency is currently in the process of increasing the number of DVLs from 1 to 2 in the centers that currently have DVLs. Their hours are staggered in order to ensure maximum coverage. While we do not have DVLs available at every Center because of the varying volume of need, they are able to cover the other centers when needed and the additional staffing will enhance their ability to do so.

O. Social Workers

Issue Raised by Advocates: The scope of practice for center social workers has not been fully defined. The success of a social work program depends heavily on proper staffing and adequate supervision, which have not yet been defined. Furthermore, social work departments must have authority to implement change and intervene meaningfully to help a/r. [BLS]

Utilize social workers to reduce security/policy interactions and traumatic incidents, resolve crises, and improve client service. [UJC/SNA]

Advocate Recommendations:

- Ensure social workers with relevant training and experience participate in defining the scope and structure of the pilot social work program. [BLS]
- Define the scope of the social work program. [BLS]
- After establishing the scope of the social work practice, define target social worker-to-A/R ratios to ensure adequate staffing and reduce the risk of staff burnout and turn-over. [BLS]
- Schedule regular meetings with decision-makers and social work program members to evaluate the social work program, determine and prioritize program needs and goals. [BLS]
- Ensure that social workers receive regular supervision from a clinical social worker (LCSW-R) to reduce the risk of staff burnout and turn-over. [BLS]
- To ensure better integration into the organization and create a meaningful role for new social workers, establish senior level position for the head social workers (such as Deputy Assistant Commissioner) with authority to intervene in different parts of HRA, particularly FIA, HPA, Special Services, and MICSA. [BLS]
- Utilize Social Workers to reduce security/policy interactions and traumatic incidents, resolve crises, and improve client service. [UJC/SNA]
- Hire more social workers. [UJC/SNA]

Agency Response:

An experienced, licensed social worker from the Workforce Development Unit within the Office of Policy, Procedures and Training (OPPT) has assisted in developing the in-Center social worker pilot and will continue to be a resource to the pilot. We are structuring the pilot in a way such that the experience will help frame the scope of the social worker practice.

The social workers (also referred to as Client Services Counselors) will start with an orientation learning the scope of HRA services, undergoing mandated trainings for DSS new hires, and learning about Center operations, including review of case information and FIA databases. They will then be deployed to the Centers to spend time learning the Center operations and workflow. They will also be able to assess the services that clients seek as well as identify the areas of perceived need for their involvement. The social workers will be reporting directly to the Center Director and will have the authority to engage with clients to identify concerns or questions they may have and make recommendations to Center Directors on how to resolve issues.

After the social workers have spent a few weeks in the Center, we will convene a focus group with the social workers, Center Directors, and management to discuss their initial experiences, identify possible areas of further development for the social workers' role, determine how the social workers might be most effective and to design and develop a staffing model and plan for the implementation of social work services going forward.

Pursuant to Local Law 162 of 2019 (adding section 21-142.3 to the administrative code of the City of New York), the Agency will be submitting a report outlining the findings of the pilot program for the provision of social work services.

P. Bill of Rights

Issue Raised by Advocates: Mistrust exists between a/r and HRA. This mistrust amplifies existing problems and can lead to fraught interactions from otherwise well-meaning individuals. [BLS]

Advocate Recommendation:

- Create a Client Bill of Rights that offers a common understanding and expectations shared by HRA and a/r. [BLS]

Agency Response:
HRA has a Client Rights and Responsibilities Flyer that is distributed to clients upon request. The Agency has developed a "Know Your Rights" poster (OCM-37 10/17) that informs clients, in twelve languages, that they can ask an HRA worker for a copy of HRA's Client Rights and Responsibilities and explains how they can make a complaint or compliment about HRA services.

The HRA Client Rights and Responsibilities flyer (FLY-969) lists the following HRA Client Rights:

1. You have the RIGHT TO BE TREATED FAIRLY AND WITH RESPECT AND COURTESY.
2. You have the RIGHT TO APPLY FOR AND RECEIVE THE BENEFITS and services for which you qualify, including the right to have a decision in the time set by law.
3. You have the RIGHT TO BE SERVED IN A LANGUAGE YOU UNDERSTAND. Please ask for an interpreter if you need one.
4. IF YOU HAVE A DISABILITY, YOU HAVE THE RIGHT TO SERVICE THAT TAKES YOUR DISABILITY INTO ACCOUNT. This may include a home or hospital visit if necessary.
5. You have a RIGHT TO CONFIDENTIALITY. HRA will not share your personal information without your permission, except under very limited conditions required by law.
6. You have the RIGHT TO REVIEW YOUR HRA RECORDS. For legal reasons some records, such as those relating to adoption or child protective services, may not be available for your review.
7. You have the RIGHT TO FILE A COMPLAINT against HRA by calling 718-291-4141 or emailing constituentaffairs@hra.nyc.gov.

8. If you think any decision about your case was wrong, you have the right to a Conference and a Fair Hearing. If you believe you are being discriminated against by HRA in any way, you have the right to file a discrimination complaint with the New York City Commission on Human Rights by calling 311 (or via nyc.gov/humanrights) or calling the State Division of Human Rights at 212-961-8400.
9. If you have children under the age of 13 in your care or custody and have an HRA work requirement, you have the RIGHT TO CHILD CARE.
10. You have the RIGHT TO BE NOTIFIED IN WRITING OF ANY CHANGE to your HRA case status, benefits or services.
11. Anyone with HIV or AIDS has the RIGHT TO APPLY FOR BENEFITS FROM THE HIV/AIDS SERVICES ADMINISTRATION (HASA).
12. If you are a survivor of domestic violence, you have the RIGHT TO SPEAK WITH AN HRA DOMESTIC VIOLENCE LIAISON.

Moreover, FLY-997 informs clients of DSS' Non-Discrimination Policy, how they can get help in their language, that they have the right to respectful service every time they interact with us, and how to report instances of discrimination, harassment, or retaliation for reporting these. This flyer is included in the Application and Recertification kits.

The Agency will do reinforcement training for staff on client rights and how to notify clients of their rights.

II. APPLICATION CHURNING

A. Managing Application Submissions, Missed Appointments and Denials

Issue Raised by Advocates: It often takes more than a single application for an eligible individual or family to be approved for assistance. When clients appear at centers to address an application denial, the agency often requires the submission of a new application even when the client is able to cure the application defect. Benefits are then issued based on later application date and households must survive without needed benefits for months.

Applications are denied for missed child care appointments. Clients who don't need child care may believe that they do not have to attend this appointment.

Advocate Recommendations:
- HRA should provide applicants with an opportunity to cure an application defect before a denial notice is issued in all cases and/or within 14 days after denial. HRA will "re-open" denied applications and issue benefits based on the initial application date. HRA will not require applicants to submit a new application. [LAS]
- If the agency has initiated protocol above, HRA will retrain and reinforce at centers to ensure benefits are issued at earliest start date possible and retroactively. HRA should assign specialized staff to monitor cases of applicants returning to center after denial. [LAS]

- When clients miss a requirement during the PA application process, wait to act on the case until the end of the application period so that the individual has additional time to meet the requirement. Often, if clients miss a single appointment during the PA application process, the case is quickly denied if the individual was unable to reschedule it in advance. Additional time would allow clients to complete missing requirements, so they do not have to re-apply all over again because they missed one requirement. [UJC/SNA]
- For clients who have not met a requirement needed for eligibility within the 30- or 45-day application period, notify clients of the missing requirement and allow them to complete it within 90 days instead of re-applying all over again. This will reduce center traffic and save both the recipient and the worker time. [UJC/SNA]
- For clients who walk into the center and have been recently denied, refer them to a worker who can allow them to complete the missing requirement instead of having to re-apply for benefits all over again. [UJC/SNA]
- Scheduling all Public Assistance employment appointments for after the 30- to 45-day application period (once the individual's case is accepted for benefits) would reduce churning and re-applications as well as center traffic. This would also prevent those who are found ineligible from spending weeks of their time in HRA work programs only to be told that they aren't eligible for cash assistance. This also is important for those with disabilities and the most barriers, who may not be able to make onto PA and through the PA application process because of all the employment appointments. If the case is accepted for benefits, HRA could include follow up information with the acceptance notice reminding the client of their employment appointment. [UJC/SNA]
- HRA should provide monthly statistics on new applications for Cash Assistance and include number of households who submitted more than one application prior to case acceptance. [LAS]
- Establish quarterly performance metrics and targets at center and worker levels. Use metrics to inform supervision and training priorities. [BLS]
- Provide a clear summary – one page – of all appointments scheduled at point of intake. To the extent that separate appointments are still necessary, we recommend that HRA provide applicants with a clear summary of all of their appointment notices—preferably on a one-page document—when they are present at the Job Center for their face-to-face interviews. [UJC/SNA]

Agency Response:
The Office of Policy, Procedures, and Training (OPPT) Training Team Operations has developed a comprehensive supervisory training, which we believe will, in turn, reduce inappropriate denials. This training provides the supervisors with a strong foundation of the knowledge and skills related to their job. The curricula are designed to allow supervisors an opportunity to gather best practices when addressing staffing issues, time management, and operational tracking tools. The training incorporates a hands-on review of the supervisory case approval process while targeting the error prone areas. Since all application decisions, both acceptances and denials, receive supervisory review and are not automated, we believe this training will make a significant impact. As we have already indicated, there have been many efforts to reduce incorrect denials. We believe these efforts have had an impact since we have seen a 54% decrease in fair hearing requests since 2014.

We will look at the timing of case denials for failure to submit required verification documentation. HRA will take a further review of these cases to determine, what, if

any, changes can be made to allow these clients additional time to submit the required documentation. This review, and any Agency flexibility, will have to be balanced against our application timeliness mandates as well as State and federal law and regulations.

The Agency is also looking at the timing of all the mandatory appointments that CA applicants are required to complete to determine if some of them can be completed after a case is accepted. This type of change to our processes would require time to operationalize and would also require systems changes; however, we will consider such changes, which are likely to require State approval. The Agency is also in the process of developing a new process to allow some clients returning within 30 days after a CA denial for failure to provide required verification, the ability to cure this defect without having to re-apply.

With respect to the recommendation that HRA provide monthly statistics on new applications for Cash Assistance and include number of households who submitted more than one application prior to case acceptance, this would require a case-by-case tracking and is not currently feasible. However, Local Law 170 of 2019 (adding section 21-142 to the administrative code of the City of New York) requires HRA to generate a related quarterly report on the termination and denial of public assistance, with the number of denials broken down by the State WMS reason code.

The Agency provides CA applicants with a summary of all their appointment notices and documentation requirements needed to determine current programmatic eligibility using the two-page form "Documentation Requirements and/or Assessment Follow-Up" (Form W-113K). We will work collaboratively in the advocates work groups to improve the way in which we inform clients about mandatory appointments and required documentation, and therefore, welcome the opportunity to work with the advocacy community to revise the W-113K and the process surrounding it. When viewed on ACCESS HRA, the due date for Form W-113K is viewable in three distinct places—within the e-notice, on the user home screen, and within the "documents" tab. Clients are also able to see upcoming appointments such as scheduled recertifications by using ACCESS HRA.

B. Robo-Calls and Missed Appointments

Advocate Recommendations:

- HRA should institute reminder robo-calls for all application appointments. [LAS]
- HRA should implement automated notifications to recipients *before* denying or closing a case. [UJC/SNA]
- HRA will provide data on missed appointments in the application process. [LAS]

Agency Response:

We currently carry out robo-calls for the CA application interview for those clients who submit an application online in a Center or at a CBO and wish to book out their interview. We provide a reminder robo-call of the interview, as well as a missed interview robo-call. We also have robo-calls for 12 other CA-related issues. We will

explore the expansion of the use of robo-calls for other CA application appointments. Robo-calls are made in connection with SNAP applications as both reminder calls and missed appointment calls. Currently, there are 19 robo-calls for SNAP cases that cover applications and recertifications.

HRA is already mandated to report quarterly on application denial reasons. This report would give the same information as the above recommendation.

C. Child Care Appointments

Advocate Recommendations:

- HRA should not deny an application for missed child care appointment. [LAS]
- HRA should ask about child care arrangements on date of application, and not schedule a child care appointment if applicant states they have child care in place. (If child care appointment is mandatory, inform applicant upfront in appointment notice of need to attend child care appointment even if they have child care in place.) [LAS]

Agency Response:
In 2014, the agency increased the initial child care return appointments from 5 to 15 days plus an additional five days as needed, giving clients more time to put child care in place. If a client is having difficulty getting child care in place, the Agency will provide potential child care options and more time. If a client indicates a need for child care in order to meet their engagement requirements, it must be in place for HRA to complete the employability assessment, which is a federal and State requirement for Cash Assistance eligibility.

The Agency does ask clients at application about their child care arrangements. A child care appointment is not given to a client if they already have child care arrangements and are not asking for the Agency to pay for that child care. Therefore, this recommendation from the advocates is something that is already an Agency policy and we will reinforce it with staff.

In addition to what has already been put in place, the Agency will engage with the advocates to reevaluate applicant engagement, including child care appointments.

D. Secret Shoppers

Advocate Recommendation:

- HRA will test application protocols and processes with secret shoppers. [LAS]

Agency Response:
Using secret shoppers is a policy that we already have in place as part of our regular quality assurance reviews. However, we are limited in the ways in which we can use secret shoppers during the application process as we are prohibited from entering fictitious information into the State Welfare Management System. We will discuss in the advocate work groups more detailed recommendations on the ways in which we can use secret shoppers in line with our legal and regulatory constraints.

E. Include Center Zip Codes on HRA's Website

Issue Raised by Advocates: It is difficult for people to find out what Center they should apply at when they are applying for the first time. As a result, there has been confusion and people have made trips to the "wrong" Center.

Advocate Recommendations:

- Publish information on the HRA website about which zip codes correspond to which center. We understand that HRA may need to use caveat language, but it is helpful for people to understand which Center their case will likely need to be assigned to, and it will prevent unnecessary confusion or trips to the "wrong" Center. [UJC/SNA]
- Include the zip codes (or other easily-identifiable designation) that belong to each Center on HRA's website. Include the zip codes after each Center so people know where to go. Circulate, publish, and distribute this new resource. [BLS]

Agency Response:
HRA will include zip codes that belong to each Job Center on HRA's website with a note that individuals with an emergency may apply at any location.

F. Conferences

Issue Raised by Advocates: Too many PA recipients are still told to "apply again" or "request a fair hearing" when they communicate to HRA staff about an issue when conferences are meaningful opportunities to resolve clients' issues instead of closing cases or telling clients to reapply.

Advocate Recommendations:

- Ensure that Job and SNAP Centers utilize "conferences" when clients identify problems with their cases. [UJC/SNA]
- HRA staff should also proactively offer to resolve issues for constituents through conferences when constituents raise an issue either on the phone or in person at Job Centers. Furthermore, once the client is given a conference, the client's issue should be addressed and resolved if possible. [UJC/SNA]
- Caseworkers should consider the many circumstances that can make it difficult for clients to comply with requirements, including mental health challenges, family emergencies, child care issues, health problems, and other issues. [UJC/SNA]

Agency Response:
HRA employs various methods by which clients can resolve case issues and as a result we have been able to reduce fair hearings by 54%. These resolution forums include walk-in conferences with Fair Hearing & Conference staff or FIA staff, telephone conferences, calls to Infoline, as well as various specialized mailboxes that advocates may use to bring cases to our attention. Staff are trained to assist clients with any and all issues when they reach out to the Agency, regardless of whether they formally request a conference. We have retrained staff on Policy Bulletin #18-51-OPE, "Reminder About An Applicant's or Participant's Right to a Conference to Challenge an Agency Action", which reminds staff to address issues rather than tell clients to

request a fair hearing or reapply. We will further discuss in the advocates work group comments or concerns regarding issues around our conferencing process.

G. Mandatory Dispute Resolution (MDR)

Advocate Recommendations:

- HRA should track MDR and their outcomes. [BLS]
- HRA should disclose the data from tracking MDRs and allow advocates to recommend changes to the MDR forms and the process [BLS]

Agency Response:
HRA will reevaluate our entire MDR process in collaboration with the advocacy community. We will look at data related to MDR in order to inform potential changes.

H. Notification

Advocate Recommendations:

- HRA should implement automated notifications to recipients before denying or closing a case. [UJC/SNA]
- HRA should use multiple communication mediums to inform clients of important information that could result in their benefits being discontinued or denied, such as missing documents or missed appointments. The communications should provide information on how the client can comply so that the case doesn't close. These communications could include text messages, robocalls, emails, letters, and notifications via the ACCESS HRA app. [UJC/SNA]
- Notify constituents if they submit insufficient documentation. If HRA is still missing documentation after a client submits documents, a worker should contact the applicant or recipient to advise them of the missing documentation. HRA should send out the documentation receipt for any previously submitted documents and create a new notice (similar to the LDSS-1146) that states, "we received your documents on (date), however we are still in need of x document(s) to meet x documentation requirement(s)". [UJC/SNA]
- HRA should create a new notice to send to constituents in instances when HRA decides a client's already-submitted document is insufficient to meet a specific document requirement. This new notice should state, "the reason the document you submitted on (date) is insufficient to verify x factor is because (reason can include "date on the document is too old/not consec," "missing signature on letter," "missing phone number for collateral contact," "illegible," etc.) and include a new due date for the applicant/recipient to submit the necessary document. [UJC/SNA]
- Clients who are attempting to meet requirements should be given an opportunity to submit additional documents. This will also reduce re-applications and Center traffic. [UJC/SNA]

Agency Response:
The ACCESS HRA online portal is a valuable resource for clients to utilize in order to get information about the status of their case. When clients use their ACCESS HRA accounts, they are able to view their upcoming appointments as well as the documents HRA has received. Unfortunately, State notices do not appear on AHRA. As stated above, the State is developing a new computer system called IES. This new system will replace the current CNS system. Once this happens, the State notices will

be available to be pulled into ACCESS HRA. In the interim, we will engage with the State to determine whether a process can be developed to allow CNS notices to appear in ACCESS HRA.

Consistent with State regulation, a client in receipt of Cash Assistance receives a Notice of Intent (NOI) with ten days' notice prior to the negative case action becoming effective. This period of time is meant to allow a client the ability to either challenge the action, or to resolve the issue. For example, if a client misses their recertification appointment and the NOI is issued, if the client comes into the Job Center and completes their recertification interview, the NOI will be settled and the action to close the case for failing to recertify will be stopped.

Additionally, there are existing robo-calls to clients when they miss their application or recertification appointment. These robo-calls are placed the day before and the day after the appointment, if the appointment is not kept. A robo-call is also conducted for clients who fail to complete and submit their six-month mail recertification. Further, clients who miss an application/recertification interview also receive a reminder letter, the "Important Information about Your Case Notice of Missed Cash Assistance Appointment" (FIA-1124). As noted above, all these initiatives have had a positive impact since we have seen a 54% decrease in the requests for fair hearings. We will continue to work with the advocates in the work groups to further reduce requests.

I. Non-Citizens

Issue Raised by Advocates: Some applicants are given misleading/incorrect information regarding eligibility and their immigration status, which discourages them from applying. Another group of applicants turn in their application and are either wrongfully denied because of their immigration status or because of the difficulty in obtaining the requested documents.

Advocate Recommendations:

- If applicant is going to be denied because of immigration status, their application and supporting documents should go through a secondary review process by a noncitizen eligibility specialist/supervisor before the denial.
- Immigration processes can be very difficult and complex. HRA should provide more leniency with the documents required from applicants. There are existing regulations in place regarding acceptance of secondary documents if primary documents are not available for applications. Applicants should be made aware of this in the notice and caseworkers should also be reminded of this. Additionally, HRA should include notices or language that alert a/r to the agency's duty to assist people in obtaining documentation.

Agency Response:

The Agency already has a secondary review process in place before denials for immigration status. We will re-train on Policy Bulletin # 17-49-OPE (Revisions to

Forms for Requesting a Clearance from the Office of Refugee and Immigrant Affairs [ORIA]), which instructs that a clearance from ORIA must be requested by Center staff prior to a case being denied for immigration status.

Further, the Agency administers a training called the Fundamentals of Noncitizen eligibility for Public Benefits. This course is a five-day module used to prepare Job Centers and related staff to process noncitizen applications and recertification for public benefits. The training focuses on processes and procedures that ensure equal access to HRA services and programs for noncitizens. Each module has select topics to enable staff to make correct noncitizen eligibility determinations. Training sessions include hands-on and other learning activities that engage participants in scenarios they are likely to encounter at HRA.

Moreover, each Center has a designated Immigrant Liaison who is available to provide guidance and instruction to staff as well as specially trained workers to help ensure that applications are appropriately processed.

Based on recent State guidance, we are currently reviewing and updating all our noncitizen eligibility-related procedures. We will then train staff on the updates. Our updates will include references to the State's newly revised Non-Citizen Eligibility Desk Aid (LDSS-4579).

Policy Bulletin #16-04-OPE addresses the duty to assist and informs Center staff of their duty to assist applicants/participants at application, recertification, or at any point of contact with obtaining documentation/verification documents, whenever possible. This duty can be done through a search of available databases or via collateral contact. We will conduct reinforcement training for Center staff on this Agency policy. We will also remind Center staff that they can find information on acceptable documentation to verify various eligibility factors in the TA/NSAP Documentation/Verification Desk Guide (LDSS-3666) and the Eligibility Factors and Suggested Documentation Guide (W-119D).

III. SCREENING FOR EMERGENCIES

A. Emergency Screening Process

Issue Raised by Advocates: The Agency is required to respond to a declaration of an emergency situation, including housing, utility, no-food, health and safety emergencies, and imminent storage auctions, and to provide notification of the Agency's determination regarding the meeting of immediate needs and/or the emergency situation. New Yorkers are often in a state of crisis when they call HRA or are applying for assistance. They need help articulating all of their emergency circumstances. In addition, many recipients do not know that the Agency can help them meet emergency and immediate needs.

Advocate Recommendations:

- HRA should modify application interview screens to incorporate a simple 4-question protocol to screen for housing, utility shut-off, no-food, and health and safety emergencies into every client contact – both in person and by telephone. In addition, HRA will include open-ended questions to help applicants to declare their emergencies and immediate needs. [LAS]
- HRA should train application workers to conduct thorough interviews to identify all of an applicant's emergency needs. [LAS]
- Each client who is determined to have an emergency after screening should get a response from HRA on:
    - what type of assistance the agency will provide to assist with the emergency [LAS];
    - what the client's obligations are to become eligible for such emergency assistance [LAS];
    - the timeline for HRA's proposed solution [LAS];
    - instructions on how the client can follow-up while HRA is working on the request for emergency help [LAS].
- HRA should publish data on screenings conducted, screening results and timeliness of agency response to emergencies. [LAS]
- HRA should measure agency compliance with screening protocol through secret shoppers. [LAS]
- HRA should evaluate and report on staffing ratios as they impact agency performance regarding screening for emergencies and responding to them. [LAS]

Agency Response:

The process of screening for client emergencies is currently part of the application interview. The application question set in our Paperless Office System (POS) does provide the worker an opportunity to address emergencies. POS provides a drop down of emergency situations that may apply and allows the worker to enter a detailed description of the emergency. A response to emergency situations is addressed via the Notice of Decision on Assistance to Meet an Immediate Need or Special Allowance (W-145HH). We also have plain language questions in ACCESS HRA's electronic CA application to make it easier for applicants to identify emergency situations.

A thorough interview is required to be completed and POS edits prevent the worker from skipping through the screens without completing the interview.

The POS application question set also addresses the Immediate Needs situation with instructions to workers based on the interview.

This question set was designed to allow the worker to assess whether an emergency situation may be present even if not declared by the applicant.

Moreover, since 2014 through all of these and other efforts, we have seen an increase in the Agency's provision of rent arrears grants, with a total of more than 250,000 grants having been paid – significantly more than the agency did previously. Prior to

this Administration, DSS provided emergency rent arrears benefits to about 42,000 households annually. Since FY16, DSS has provided emergency rent arrears benefits to over 55,000 households annually.

While the Agency has implemented many of the recommendations provided by the advocates, we will discuss these matters further in the advocates work group.

HRA currently uses secret shoppers to measure client service as part of its quality assurance reviews. However, we are limited in the ways in which we can use secret shoppers during the application process as we are prohibited from entering fictitious information into the State Welfare Management System. We will discuss in the advocates work group more detailed recommendations on the ways in which we can use secret shoppers in line with our legal and regulatory constraints.

IV. TAKE OVER OF PROCESSING FHEPS APPLICATIONS - HOMELESS DIVERSION UNIT (HDU)

A. Managing FHEPS

Issue Raised by Advocates: HDU's takeover of the FHEPS process from the 6 paid FHEPS providers is a significant departure from the decades-long established practice of having community advocates resolve multiple issues and submit the FHEPS applications. All of the center problems listed above will be exacerbated by the addition of FHEPS applicants being assisted in job centers. Confusion occurs when clients have applicant arrears, voucher questions, and need ongoing benefits. Additional delays in processing new applications will have devastating consequences for clients in eviction proceedings. In particular:

- HRA is not adding staff to serve additional clients and do the additional work of taking over FHEPS applications from the 6 paid FHEPS providers.
- Many of the families who might be eligible for FHEPS have Undercare issues which must be resolved before an application can be processed. (The problems with HRA's ticketing system will be exacerbated for these families. Please see recommendations and proposed solutions on "ticketing" and "in center" issues.)
- Families are being referred to HomeBase by HDU then back to HDU after addressing selected issues, presenting additional risks for delay and jeopardy to the housing court case, as well as benefits case closure and adverse effects.
- Clients will be interacting with HRA and HDU more frequently, and they will have different caseworkers involved in assisting them: HomeBase intake workers, HomeBase case managers, HomeBase supervisors, HDU AJOS workers, CMU AJOS workers, and others.

Advocate Recommendations:

- HRA will hire additional staff to process FHEPS applications and not rely on the current HDU staff to take over this work. [LAS]
- Undercare issues that are raised by the client or HDU in conjunction with a FHEPS application and a housing court case should be addressed the same day at the center

unless the client seeks a return appointment due to a conflict. [LAS]

- Necessary return appointments should be scheduled as soon as possible and with attention to court deadlines without exception. [LAS]
- When the FHEPS application cannot be submitted, approved and checks issued in advance of a court deadline, the client should be referred immediately to HomeBase or a legal provider to help the client obtain additional time in housing court. [LAS]
- DSS/HRA should publish monthly statistics on FHEPS applications. [LAS]
- Designate one person in each HDU as the FHEPS liaison, who will be the point of contact for legal advocates and HomeBase staff. [LAS]

Agency Response:
The Agency has developed a procedure for staff to follow in processing FHEPS applications and referrals to Homebase, including in-center referrals to address undercare issues such as sanctions which may impact FHEPS eligibility. The switch in processing FHEPS applications to the Job Center is relatively new as we imbed this State benefit as an entitlement, and we welcome feedback on how to make the process better for clients. This is an issue that is currently being addressed in one of the advocate workgroups and we will continue working on any issues around the process.

Any undercare issues that may impact a client's FHEPS eligibility and housing court case are addressed as soon as possible in the Center. HDU staff have been trained to identify undercare issues and to ensure that those issues are handled within the Case Management Unit (CMU). As part of our current procedures, return appointments are scheduled as soon as possible, with attention to court deadlines. There has also been a change in volume of cases referred to HDU since FIA's application and case management units now have the ability to resolve some requests for rental assistance without a referral to HDU. As of March 2019, Policy Bulletin 19-16-OPE communicated this change in workflow, which was intended to decrease the number of rent arrears requests that went through HDU in anticipation of the change in work as a result of the FHEPS transition. We will reinforce this requirement.

V. HOMELESS POPULATION

A. Apartment Search Allowance Problems

The Issues: The agency does not consistently provide apartment search allowance to eligible temporary housing (TH) residents from the date of their initial eligibility for the benefit and/or as an ongoing benefit.
When the agency removes WEP carfare from a TH household, the agency routinely fails to add the apartment search allowance to the household's budget.

Advocate Recommendations:

- HRA Retraining and reinforcement at every center. [LAS]
- Every six months, conduct a mass review and re-budgeting of households eligible for and not receiving apartment search, and issue retroactive benefits beginning with date of eligibility. [LAS]
- Develop an IT solution. [LAS]
- Create a specialized homeless unit at every job center and assign each homeless

household an individual case worker. [LAS]

- Issue a report every three months on number of households in TH with open Cash Assistance cases, number receiving apartment search allowance, and number receiving WEP carfare. [LAS]

Agency Response:
The Agency will work on this issue with the advocates to ensure that clients are receiving the benefits to which they are entitled.

B. Storage Payment Problems

Issue Raised by Advocates: Some storage payment cases do not get placed in or picked up by the automated storage payment system resulting in missed storage payments, late fees, and storage auctions. Advocates report that auctions occur even after the Agency pays all storage arrears including late fees.

Advocate Recommendations:

- Examine every storage case brought to agency's attention via clients, advocates, and fair hearing process to determine which cases are due to worker error, technological problem, or both. [LAS]
- Retraining and reinforcement at centers on storage policy/procedures and to ensure storage payment cases are closely monitored and agency communicates with storage companies to prevent auctions. [LAS]
- Develop IT solutions. [LAS]
- Ensure any systemic issues are corrected immediately to avoid auctions and late fees. [LAS]
- Create a specialized homeless unit at every welfare center and assign each homeless household an individual case worker. [LAS]
- Collect information from every center, monitor fair hearing requests, decisions and dispositions and issue a monthly report on storage problem cases including a description of the issue and remedial action taken. [LAS]

Agency Response:
The automated storage fee payment process was implemented in 2014 as a way to reduce the number of Center visits a client in a DHS or HRA DV shelter would have to make. Generally, storage fees must be requested each month along with verifying that the need for storage still exists. As an Agency, we felt that this was an unnecessary requirement for clients in shelter as we are able to verify continuing need through systems matches with DHS and HRA. We will work with the advocates to make sure the process regarding storage fee payment is in line with our procedure. The Agency recently evaluated cases brought to our attention by the advocates to determine whether there were any IT issues regarding cases that were not picked up in our automated storage payment system. We identified some systemic issues which were resolved. We also determined that some of the cases were not picked up because of worker error. We recently provided training on our new storage fee procedure and believe that this will assist our staff in providing assistance in these cases. The fair hearing unit will to look at and monitor fair hearing decisions for storage cases and discuss with the advocates any issues we are seeing with the cases.

C. Notification of the Availability of Special Needs Grants

Issue Raised by Advocates: Homeless applicants for Cash Assistance are unaware of the availability of special allowances such as grants/vouchers for the replacement of clothing and cash immediate needs grants to pay for diapers, feminine hygiene, and other health care items. They are also unaware of the apartment search and restaurant allowances; therefore, they do not know to request these allowances when they are not included in their budget.

Advocate Recommendations:

- Engage in a multi-faceted robust communications strategy to inform applicants and recipients about these grants, affirmatively screen clients for emergencies (see section on Screening for Emergencies) and affirmatively assist clients in securing these grants. [LAS]
- Re-train all Job Center workers on the array of HRA grants. Provide comprehensive re-training to workers on all HRA additional grants and ensure that workers conducting eligibility interviews ask constituents if they are aware of and in need of the grants available to them. HRA must make sure all Center workers understand the array of HRA grants and general eligibility for programs, and that recipients are screened for all applicable grants at each application and recertification. [UJC/SNA]
- Create a specialized homeless unit at every welfare center and assign each homeless household an individual case worker who will review all available grants with clients at application and recertification. [LAS]
- Designate staff at each center who specialize in benefits for those who are homeless. This will ensure that homeless New Yorkers are screened and issued extra grants for which they qualify, such as automated storage payments (for those in DHS shelters), apartment search carfare, and restaurant allowances. This will foster smoother transitions for families entering the shelter system for the first time, as well as provide resources on moving-related grants that these households can apply for when they locate new permanent housing. [UJC/SNA]
- Report on communications strategy to inform applicants and recipients about these grants [LAS]
- Institute new protocol and script requiring workers to review HRA's one-page summary regarding different grants at application and recertification. HRA has a flyer that summarizes extra grants available to PA recipients, called Cash Assistance Additional Allowances, Form W-137C. This flyer is supposed to be included in all application packets. However, because benefit applicants receive hundreds of papers as part of the application packet, this information is easily missed. HRA should add language directly to the initial application and annual recertification scripts where workers emphasize this form and briefly review the list of additional grants with constituents. [UJC/SNA]
- Institute new protocol and script requiring workers to screen all PA applicants for immediate needs grants and inform PA applicants about the availability of multiple immediate needs grants during the 30-45 day application period. We have met with many

clients with no income who were never informed of the availability of immediate needs grants and were not screened for them. [UJC/SNA]

- Issue monthly reports on number of households receiving these benefits prior to implementation of the communications strategy and thereafter. [LAS]
- Institute an information table at Job Centers specifically to provide information about additional resources, constituent's rights, and extra grants. Similar to Housing Court Answers, this table would provide general eligibility information on grants and other resources (i.e. legal service providers, food pantries, housing applications, etc). We do not propose this to be a new resource for case conferencing or general case actions. HRA could start by soliciting input, assistance, and participation from third-party organizations for a pilot on a volunteer basis, similar to programs already in place in the NY Court System. [UJC/SNA]

Agency Response:
The agency will develop a communication strategy to inform applicants experiencing homelessness about the benefits to which they may be entitled.
Currently, the Office of External Affairs holds periodic resource fairs at DHS shelters. At these events, participating shelter residents receive a presentation on AHRA and CA special grants requests from the DSS Outreach team. Residents also receive hands-on AHRA support with applications. Additionally, our outreach teams regularly hold emergency grant events in NYCHA developments. All of our outreach teams share information regarding these special grants and assist clients in applying for them. The CA pilot we've been operating in the Bronx assists clients with special grant requests through AHRA, and with the expansion of the CA pilot citywide there will be many more organizations providing assistance to their clients with these grants through AHRA – and the recent State approval to expand on-line submission to all clients will further enhance access. Along with the benefits enrollment support Outreach provides to both clients and CBO partners, Outreach staff also conducts recurring trainings to CBO staff on ACCESS HRA, which includes a section on CA special grants and the steps to request these grants via AHRA.

D. Meals and Restaurant Allowance

Advocate Recommendations:

- Retraining and reinforcement at every center. [LAS]
- Conduct a monthly review of cases at non-cooking/no meals TH facilities and re-budget all households not receiving restaurant allowance. Retroactive benefits owed must be issued beginning with date of eligibility. [LAS].
- IT solution to ensure issuance of (1) full restaurant allowance to residents of non-cooking/no meals facilities and (2) partial restaurant allowance to residents of meal-providing facilities engaged in employment-related activities. [LAS]
- Create a specialized homeless unit at every welfare center and assign each homeless household an individual case worker. [LAS]
- Issue an updated list every six months of TH facilities detailing meal provision arrangements, cooking and non-cooking facilities, and those with reported problems with provision of gas for cooking. [LAS]

- Issue a report every six months with total number of households in unit at each non-cooking/no meals/ no gas facility receiving Cash Assistance and number of households receiving restaurant allowance. [LAS]

Agency Response:
The Agency will work with the advocates on this issue to make sure that clients are receiving the benefits to which they are entitled.

Since the integration of DHS and HRA, the two agencies work closely to assist the clients that are served by DSS/HRA/DHS. All of our staff are trained to understand the unique benefits and services for which people experiencing homelessness may be eligible.

The agency does maintain a comprehensive list of shelters and the level of food services that they provide. This list is routinely updated to make sure that the Centers have the correct and most updated information.

Shelter addresses are confidential, so we are not able to publicly provide lists of facilities.

DHS-PB-2019-023 (Section 5.1) – instructs DHS shelters and providers that signage must be posted and a flyer available in the welcome packages explaining the process for requesting a "to-go" meal for residents who will be off-site during the meal service.

We will explore greater interconnectivity between HRA and DHS systems that would reflect any changes that happen after a client first reports to a Job Center, which may impact benefits or services potentially available to clients based on their shelter assignment.

VI. SERVING CLIENTS WITH DISABILITIES

Issue Raised by Advocates:
Disabled people who call Infoline and other HRA phone numbers may get easily frustrated by (1) multiple, wordy prompts that they do not understand, including the legal term "reasonable accommodation"; (2) instructions to visit a website when they are not computer literate; (3) wait times on hold; (4) an inability to leave a phone number for a callback because they don't have a phone or can't remember their phone number; and/or (5) the promise of a return call within 48 hours when they are experiencing an emergency.

Disabled people who visit job and SNAP centers may become overwhelmed immediately upon entering a crowded waiting room and quickly leave without filing an application or recertifying for direly needed assistance. Others may not be able to tolerate long wait times due to their disability or illness.

Sight-impaired individuals have difficulty reading HRA's small print notices. The agency's response that these individuals should visit libraries with assistive technology to read their notices does not recognize the burden this creates for some individuals who reside far from a library and may have additional challenges.

Deaf individuals who need interpretation services have difficulty getting timely help - often having to return repeatedly because an interpreter has not been scheduled for a known appointment or the interpreter is not confirmed in advance.

Advocate Recommendations:

- Staff HRA phone lines adequately to ensure there is an easy, quick way for a disabled person to reach a representative on all HRA telephone lines and state that option upfront. [LAS]
- Phone representatives should routinely offer to administer a voluntary 4-5 question disability screening tool which ascertains whether someone will need reasonable accommodations and those same representatives should put those accommodations in place immediately. [LAS]
- Immediately upon a visitor's arrival at job and SNAP centers, administer a voluntary 4-5 question disability screening tool to ascertain whether a visitor will need immediate accommodations in the application or recertification process. Put those accommodations in place immediately. [LAS]
- Assign trained staff to every Job Center and SNAP waiting room to observe and engage with visitors to ascertain whether individuals may need special assistance and/or reasonable accommodations and ensure such accommodations are put in place and followed. [LAS]
- Hire additional staff to ensure that people with disabilities are served promptly and properly and in accordance with all applicable statutes, regulation, and policy. [LAS]
- Improve service delivery to visually impaired clients and those who are deaf and provide effective means for them to file complaints about lack of access. [LAS]
- Upon request for a RA, OCS should search the applicant's/participant's record for previous RA approval, WeCARE history, supportive housing application, receipt of home care services, or other evidence that can support need for RA. OCS should document in POS outcome of search for previous Reasonable Accommodation approvals, WeCARE history, supportive housing application, receipt of home care services. If sufficient documentation to support RA is found, HRA should not request additional forms/documentation from applicant/applicant's physician. [BLS]
- Amend Form HRA-103 to include a checkbox option allowing a/r to request help obtaining medical documentation. [BLS]
- When an RA is requested in-person, HRA/OCS should immediately obtain HIPAA and physician information from applicant. [BLS]
- Applicants who request assistance obtaining documentation should not be denied RAs for lack of supporting documentation unless:
    - HRA has documented in POS that search for WeCARE history, supportive housing application, receipt of home care services returned no results or insufficient evidence AND
    - Applicant has not provided physician contact information or signed HIPAA to HRA at any point AND:

      * HRA has documented in POS attempt to obtain HIPAA and physician information by phone

  * HRA has documented in POS attempt to obtain HIPAA and physician information by letter
  * HRA has documented in POS attempt to obtain HIPAA and physician information by home visit [BLS]

- Provide short-term case management services to people who have requested RAs (utilizing the new social workers located in centers) [BLS]
- Data:
  - Track at center and worker levels:
    - # of A/R who request RAs
    - # of A/R whose request for RAs are granted/denied
    - # of RA request denials, by denial reason
    - # of RA requests by accommodation type (e.g. help reading forms, shorter wait times etc.)
    - # of RA approvals and denials by requested accommodation type (e.g. help reading forms, shorter wait times etc.)
    - # of RA requests that included requests for help obtaining documentation and were denied for lack of documentation.
    - Publish the above information for each center on HRA's Website
  - "Goal Zero": Clearly communicate to all HRA workers that the goal is zero RA denials for lack of medical documentation. [BLS]
  - Establish (or incorporate into existing) metrics and goals at center and worker levels. Disseminate quarterly center- and personal worker-level numbers to center workers, OCS staff, and relevant center and agency management. Use report to inform supervision and training needs.
    - % of RAs requests that were denied during calendar year, broken down by month. Consider illustrating data with graph.
    - % of RA requests that were denied for lack of documentation, broken down by month. Consider illustrating data with graph. Goal should be 0%.
    - % of RA requests that included requests for help obtaining documentation and were denied for lack of documentation during calendar year, broken down by month. Consider illustrating data with graph. Goal should be 0%.
    - % of to-date total RAs requests that were denied for lack of documentation during calendar year. Goal should be 0%.
    - Publish the above information for each center on HRA's Website BLS]
- Unless physician indicates RA is needed temporarily due to injury or short-term condition, RA should be in place for life of applicant across different benefits and services administered by HRA and DHS. Before denying any application for services for noncompliance-related reasons, DSS should search the applicant's/participant's record for previous RA approval, WeCARE history, supportive housing application, receipt of home care services, or other evidence that can support need for RA. When documentation is found, HRA should grant or extend the RA based on the agency's own records. [BLS]
- Before denying any RA request for a lack of supporting documentation, require that HRA/OCS representative document in POS outcome of search for previous reasonable accommodation approval, WeCARE history, supportive housing application, receipt of home care services, or notation that the individual

requested assistance obtaining medical documentation. [BLS]

- HRA Form HRA-104 (Decision on RA) - Include the same check boxes for the RAs that are on the HRA-103 so that HRA staff can easily and quickly identify the specific RAs that have been granted in addition to a narrative section that can help to explain other details. Include a definition box that explains what a reasonable accommodation is and why HRA is required to offer them. [BLS]
- When HRA issues approvals or denials, HRA should send an audio recording via US mail or set up a phone tree system that contacts people to let them know about the decision in addition to the formal written notice. [BLS]

Agency Response:
HRA appreciates the advocates' comments and will continue to work with the advocates work groups on these issues. HRA has a strong commitment to serving clients with disabilities to ensure meaningful access to its benefits and services. The Agency has comprehensive processes in place to assist clients with disabilities that have been implemented pursuant to the court's jurisdiction in the 2005 Legal Aid Society litigation that relates to disability access that this Administration settled in 2015: *Lovely H. v. Eggleston*, 05-cv-6920 (KBF). As a result, HRA has increased the number of reasonable accommodations for clients from 90 per year as of April 1, 2014, to more than 51,000 as of May 2019.

The Stipulation and Order of Settlement in *Lovely H. v. Eggleston,* which was approved by the court on June 22, 2015, requires the implementation of comprehensive processes to serve clients with disabilities. This includes:

- **Maintaining a menu of reasonable accommodations, such as non-rush hour appointments, flexible scheduling, priority queuing, assisting clients with reading and completing forms, sign language interpretation, and home visits, among others. Only some requests for reasonable accommodations require clinical documentation. For example, sign language interpretation, assistance for the blind and visually impaired, and assistance reading and completing forms do not require documentation. Most requests for reasonable accommodations are granted provisionally and provided while HRA reviews medical documentation. The Agency informs clients that it will assist to obtain clinical documentation and provides this assistance, when requested. If a client does not submit required documentation, the Agency will conduct outreach to the client and search its own records for documentation before making a determination on the reasonable accommodation request. HRA conducts outreach before denying reasonable accommodation requests and provides alternative accommodations when appropriate;**
- **Accepting requests for reasonable accommodations at HRA offices and by telephone, fax, email, and mail;**
- **Assessing for and offering reasonable accommodations at WeCARE;**

- Providing notices when clients request reasonable accommodations and when HRA makes determinations on requests or appeals of reasonable accommodation requests;
- Creating a client services screen in Agency systems which appears automatically in Agency computer systems to client-facing staff across Agency programs and includes information about provisional and granted reasonable accommodations and other special service needs;
- Developing screening tools with the assistance of experts to assess whether clients need reasonable accommodations to comply with program requirements at certain interactions;
- Assessing and providing appropriate case management services to help certain clients with disabilities maintain their benefits;
- Providing and documenting enhanced outreach by phone, mail, email, and home visits as appropriate for WeCARE clients who miss appointments;
- Permitting some WeCARE participants to conduct appointments by telephone;
- Assessing appropriate WeCARE clients 50 years of age or older for disabilities under the Social Security Administration rules and assisting clients with applying for Social Security disability benefits;
- Assigning WeCARE participants reduced hours for work assignments as appropriate to their functional capacities and need for reasonable accommodations;
- Forming a disability advisory community panel to advise HRA on policies and practices that impact clients with disabilities;
- Performing disability impact reviews of new and revised policies and procedures;
- In some circumstances, before taking a negative action for failure to comply with required activities, HRA reviews the case to ensure that the client's disability was not a factor in the non-compliance and that reasonable accommodations, if needed, were provided to enable the client to comply with required activities;
- Preventing negative case actions by implementing automated telephone calls and letters to remind Cash Assistance applicants/participants of their upcoming and missed application and recertification interviews and that they need to return their Mail-in Recertification/Eligibility Questionnaires;
- Revising notices and other written materials most frequently provided to clients for readability and to include disability rights information, which notifies clients of their rights and how to request reasonable accommodations;

- **Taking steps so that HRA communications are effective and available in multiple formats, giving primary consideration to the format requested by the client and making its website accessible;**
- **Creating a position of Executive Director of Disability Affairs to collaborate with HRA program areas, assess policies and procedures, and investigate complaints related to disabilities;**
- **Enhancing and implementing systems to ensure effective communication, including enabling effective, real-time communication for clients who are hearing impaired, which HRA does through video-remote interpreting, the provision of sign-language interpreters in person, and directly through video phones; and**
- **Monitoring the provisions of the settlement.**

The following procedures have been adopted pursuant to the court settlement:

- **HRA Policy Bulletin # 03-2016: Human Resources Administration (HRA) Reasonable Accommodation/Modification Policy**
- **Policy Directive #16-27-OPE: The Americans with Disabilities Act (ADA) and Reasonable Accommodations (RA) Accommodation/Modification Policy**
- **Policy Directive #16-26-OPE: Home Visit Needed/Homebound (HVN/HB) Status Request/Reasonable Accommodation Request (RAR) Unit**
- **Policy Bulletin #17-62-OPE: Home Visit Needed (HVN) Referrals Received by Center 90 from Community Based Organizations (CBOs) on Behalf of Individuals Participating in the Street Homelessness Outreach Project**
- **Procedure #18-07-CAS-WC: Reasonable Accommodations for WeCARE Clients**
- **Policy Bulletin #18-42-OPE: New Disability Screening Process in the Paperless Office System (POS) to Help Identify the Need for Reasonable Accommodations**
- **Policy Bulletin #18-45-OPE: Renewal Process for Home Visit Needed/Homebound (HVN/HB) Status**
- **Policy Bulletin #16-105-OPE: Revisions to Cash Assistance Robo-Calls for Scheduled Eligibility Interviews and the Eligibility Mailer; Centralized Interview Rescheduling Unit**
- **Procedure #18-02-CAS-WC: WeCARE Case Management Services**
- **Center Directive #18-03: Identifying Homebound Applicants and Participants with High Needs**
- **Policy Directive # 17-19-OPE: Revisions to Servicing Deaf and Hard of Hearing Applicants and Participants**
- **DSS Policy Bulletin #2019-003: Servicing Clients Who Are Deaf or Hard-of-Hearing**

Regarding individuals who are deaf and hard of hearing, we have engaged in extensive efforts in recent years to improve our ability to enable access to sign language interpretation. A few years ago, we conducted several focus groups with individuals who were deaf and receiving HRA services. This led to the development of *the ASL Options Card: A Tool For Staff* that assists our workers in offering the person who is deaf the option of and in-person interpreter, Video Remote Interpreting (VRI), or an appointment to return at a later date and time when an ASL interpreter will be present. The card folds so that the worker can only show the options and the wait times for the options that are available on that day at that location. The card also provides instructions to the worker on how to order an interpreter and allows them to show other language options to the individual in the event that they are not fluent in ASL and prefer another language to communicate. This card was developed with extensive input from the deaf community.

In addition, people who are deaf can now contact us directly via Video Phone through Infoline's ASL Direct. By calling 347-474-4231, they can reach a staff member who is fluent in ASL.

Videos explaining both of these options are now available on the DSS website: https://www1.nyc.gov/site/hra/help/asl-services-for-hra-and-dhs-clients.page

Regarding complaints, all of our clients, including people with disabilities can make a complaint in writing, by phone, by email or in person. Anyone can contact HRA's Central Compliant Unit as well as 311 to make a complaint that will get to HRA.

Regarding the suggestions about accessing clinical documentation that already exists at HRA and ensuring that OCS and ORA staff review previous RAs before asking for information, this is already in place. The OCS staff who process the RA requests all review the RA history and offer help to an individual who may have difficulty accessing documentation. If the individual does need assistance, it is forwarded to ORA to provide that assistance. ORA also has a system to review all clinical documentation within the HRA system and will not pursue further documentation if there is current and appropriate documentation available.

VII. LANGUAGE ACCESS

Issue Raised by Advocates: Local, State, and federal law as reflected in agency policy require HRA to ensure language is not a barrier to accessing and maintaining benefits. Nevertheless, far too often, agency policies are not adhered to, and in some cases, the agency claims that it is powerless to fix problems that are within the control of the State.

Advocate Recommendations:

- HRA needs to come up with work arounds for State notice deficiencies and better monitor its own performance in adhering to language access policies using techniques described in quality control section infra. At a minimum HRA should periodically undertake the following analysis:

- (i) evaluate a random sample of cases from various stages of dispute resolution -- conference, conciliation, and fair hearing – and determine whether preferred language was recorded, honored, and if not, the outcome of the dispute; [LAS]
- (ii) evaluate a sample of cases in which a preferred language was recorded to see if the language preference was honored in written and verbal communications with the client; [LAS] and
- (iii) do a separate review of fair hearings where language access was raised as an issue. [LAS]

Agency Response:
In order to complete the application interview activity in POS, the fields for preferred written and spoken language must be populated. All auto-generated, written forms and notices automatically generate in the language of preference, if it is one of the Local Law 30 languages. We will undertake a review to ensure that written notices were provided in the client's written language of preference.

We will reinforce our protocols with staff. In addition, if clients are not receiving notices in their language of preference, it most likely means that their written language indicator is not accurate. Clients can change this indicator via ACCESS HRA (also available in the Provider Portal), by calling Infoline, or visiting a Job or SNAP Center.

Advocate Recommendation:

- Publish monthly usage of Language Line services (# of minutes used, for example) per center & number of languages accessed per center [BLS]

Agency Response:
The Agency will explore the data available and the possibility of publishing it.

Advocate Recommendations:
- HRA should also keep track of the number of CNS notices in which a preferred language other than Spanish is recorded but in which the agency is not able to honor the preferred language because of State computer deficiencies. [LAS]
- HRA should share with the City Council the outcome of the above evaluation and the number of CNS notices that failed to comply with required language access laws. [LAS]

Agency Response:
State CNS Notices are only available in English and Spanish. Therefore, anyone who has a preferred reading language other than English and Spanish did not receive a State notice in their preferred reading language.

Advocate Recommendation:
- Snippets and translation issue. Notices are sent partially in English and partially in Spanish (they are not fully translated). [MTR]

Agency Response:

The Agency has done a full review of all notices and forms to ensure that we have included translated snippets and check boxes for any reasonably expected client circumstances. Due to the nature of the Agency's work, there may continue to be a minimal number of unique client situations that would require the use of free text. Therefore, the Agency welcomes feedback from advocates on any free text that has appeared more than once on any notice or form and we will engage the advocate work groups to develop such additional snippets.

Advocate Recommendation:

- Language Access and Wait Times for Spanish Language. The Spanish numbers takes about 2 hours for someone to answer (the English number is much faster). [MTR]

Agency Response:

There are no language-specific Agency telephone numbers. The next available agent answers the next call in line at all Agency telephone numbers. The average wait time for interpretation services using language line is ten seconds.

Advocate Recommendation:

- When Kiosks allows you to select a language, it should immediately ask if you require an interpreter in selected language for the whole appointment. Tickets already note language spoken by client, but there is currently no follow up afterwards. The kiosk should explicitly print confirmation of the request for interpreting services for the rest of HRA visit. Kiosks should randomly print surveys that a/rs can submit after their appointments. Surveys should assess whether a/r is satisfied/unsatisfied with the interpreting services along with open feedback. Centers could include a "drop survey here box" at or near exits and/or near the carfare line. Surveys should be available via ACCESS HRA as well. [BLS]

Agency Response:

Clients' preferred, spoken language is printed directly on the ticket. This serves as a double-flag. It prompts clients to change their indicators if they are incorrect and prompts staff to provide language services if they do not speak the client's primary language.

For clients whose preferred language is anything other than English, the kiosk also auto-generates a notice about free interpretation services in eleven languages available to clients.

In addition, the Agency has developed the "I Speak…" (PALM-20) card, which is distributed to clients. This business-size card is designed to help LEP clients receive services in their preferred language, to identify the individual as LEP, and to notify the Agency that the client requires language assistance services. The PALM-20 card should be presented by LEP clients to Agency staff during any visit to a Center. Once the client presents the card, staff should begin the process of providing interpretation

services. The PALM-20 was introduced to staff and is discussed in Policy Directive #18-10-OPE: Servicing Limited English Proficient (LEP) Individuals.

We will explore instituting a survey for clients to provide feedback on their interpretation services.

Advocate Recommendation:

- Before a worker is allowed to complete/close out appt, clients should be required to attest that they have received services in their preferred language (notice should also be in their preferred language). Clients should write in their preferred language, "I received help" or other simple phrase beyond a mere signature. [BLS]

Agency Response:
We will discuss this further in the advocate work groups because we have a concern about adding time to the application interview and the potential impact on clients.

Advocate Recommendation:

- Workers must enter a case note recording how language services were provided for all client visits (not just those specific to case changes, recerts, new application). Workers should enter the name of the interpreter (or interpreter identification number when using Language Line or equivalent service) in POS after each interview. [BLS]

Agency Response:
As set forth in Policy Directive #18-10-OPE entitled "Serving Limited English Proficient (LEP) Individuals," workers are required to enter information on how language services were provided in connection with the below listed activities or actions, not just in the limited situations mentioned above.

- **CA Application Intake**
- **CA Application Interview**
- **CA Change Case Data**
- **CA Recertification Interview**
- **Case Member Addition**
- **Non-Food Emergency/Special Grant**
- **Client Intake and D&C Referrals**
- **SNAP Reception Intake**
- **Document Intake**
- **IN/ESNAP Issuance (CA/SNAP Case)**
- **HRA SNAP Outreach Intake**
- **SNAP Application Interview**
- **ESNAP Issuance (NCA SNAP)**
- **SNAP Change Case Data**
- **SNAP Recert Interview**
- **Application Modification**

We will reinforce these requirements with staff.

Advocate Recommendation:

- Employ “secret shoppers” who have different primary languages to assess compliance. [BLS]

Agency Response:

We are limited in the ways in which we can use secret shoppers during the application process as we are prohibited from entering fictitious information into the State Welfare Management System. However, we will explore expanding the scope of secret shoppers.

Overall Agency Response on Language Access:

The Agency will work on the recommendations presented by the advocates around language access as well as partner with advocates to address language access issues with the State. The Agency is committed to making sure that clients receive information in their preferred language.

The Agency is also committed to creating a multi-lingual Agency by hiring additional bilingual staff. As of 2019, the Agency has 1,050 bilingual staff who speak 103 languages.

In 2019, the Agency engaged secondary interpretation and translation contractors in order to improve the quality of our written documents and ensure. These contractors are also able to provide us with translators for clients who speak languages of a limited diaspora.

VIII. PHONE ACCESS ISSUES

Issue Raised by Advocates:

HRA clients have difficulty connecting via telephone to HRA staff about emergencies, the status of an application, or to be able to trouble-shoot problems with benefits, child care or training.

There are 3 main issues: 1) calls are not returned; 2) clients cannot leave messages because worker voice mails are full; and 3) HRA central “Infoline” wait times are long and more importantly, the line is not designed to solve problems: staff can only provide information and take messages – they cannot trouble-shoot cases issues.

Advocate Recommendations:

- Give clients telephone access to staff responsible for opening cases, resolving emergencies and troubleshooting case issues; [LAS]

Agency Response:

As stated earlier, Infoline will become the central telephone contact for HRA clients through a single contact number and entry point. The goal is to offer New Yorkers easier ways to interact with HRA through technology and reduce wait time in Centers. Multiple IVRS applications will be streamlined and integrated into one system and one

number for clients and stakeholders to call to maximize resources and improve client service. The One Number IVRS will be redesigned to more closely align with leading practices, improve efficiency, and incorporate speech recognition.

The new One Number IVRS will:

- **Provide directed dialogue capabilities so that callers can respond to questions with keywords to reach the information they need quickly.**
- **Enable routing and internal transfers based on agent skill set, enabling callers to reach the agents with the right expertise with minimal disruption.**
- **Provide self-service options supported by web service integrations with HRA systems to allow callers to check case status and benefit information, request documents, reschedule appointments, and carry out other common interactions.**
- **Offer the option to hold a caller's place in the queue and automatically call them back when an agent becomes available.**
- **Allow for call recording, listening, and archiving in support of the agency's management and accountability and program integrity needs.**
- **Provide robust reporting to enable ongoing management and planning around agent staffing, content refinement, bandwidth needs, and other ongoing operational and strategic considerations.**

Advocate Recommendation:

- Create accessible rescheduling lines for all appointments. While constituents are able to reschedule some types of appointments, other appointments can be extremely difficult to reschedule because they rely on Job Center phone lines. All appointment rescheduling should be handled by specialized phone numbers where constituents can reach live HRA staff. [UJC SNA]

Agency Response:
We will explore the possibility of allowing clients to reschedule appointments through ACCESS HRA.

Advocate Recommendation**:**

- Analyze staff ratios needed to handle these calls and hire additional staff to handle these calls and do case work needed; [LAS]

Agency Response:
The Office of Constituent Services (OCS) business operations team periodically conducts staffing assessments using industry-standard staffing models to ensure Infoline has enough phone agents to cover call volume. As we transition to the One Number initiative, we will evaluate staffing needs. As noted earlier, one of the drivers of our call volume consists of calls about the State's MLTC program that we do not run.

Advocate Recommendation:

- Analyze staff ratios needed to handle these calls and hire additional staff to handle these calls and do case work needed; [LAS] and establish and enforce adequate staff-to-A/R ratios to ensure adequate staffing to meet basic needs and reach their caseworkers. [BLS]

Agency Response:
See above answer.

Advocate Recommendation:

- Monitor telephone performance in responding to calls and messages. [LAS]

Agency Response:
A Quality Assurance team was created within the Infoline call center in 2019. This team is responsible for monitoring live calls and ensuring that HRA call agents are providing accurate information to clients. The call monitoring is also used to assist with coaching and training opportunities for the call center staff.

Advocate Recommendation:

- Conduct and publish weekly audits of staff voice mails to ensure voice mailboxes are not full (include staff ratios in the audits); [LAS]

Agency Response:
The agency already internally monitors telephone performance through telephone audits conducted by FIA's Office of Reporting and Performance Management. Pursuant to PD # 12-26-OPE – Revisions to Voicemail Protocol, there is a telephone voicemail liaison who must perform random monthly voicemail audits.

Advocate Recommendation:

- Conduct secret shopper monitoring of telephone service review client telephone service to address: applications, emergencies, and troubleshoot case problems. [LAS]

Agency Response:
Calls are made to Infoline by a "Secret Shopper" and those results are used for coaching and training purposes.

Advocate Recommendation:

- Designate 1-2 people at each center who are liaisons responsible for responding to advocates [BLS]

Agency Response:
Approximately five years ago, the Agency developed the Advocate Inquiry specialized email box for the purpose of responding to inquiries from advocates. However, the Agency will provide a list of Center liaisons for advocates to contact.

Advocate Recommendation:

- Ensure that Infoline staff do not discourage constituents from submitting complaints, that complaints submitted through the Infoline are actually resolved, and that urgent issues are resolved within quicker timeframes. Clients that call the HRA Infoline are often discouraged from filing a complaint. Furthermore, even when clients do file a complaint, often their issue is not resolved. Additionally, clients are told that their complaint will be addressed within 2 weeks and do not usually offer any options for faster resolution, even if the client identifies that the complaint is an emergency. [UJC SNA]

Agency Response:
Based on HRA's analysis, 90% of all calls that are answered by Infoline are resolved. The types of calls that are resolved include requests for information about client benefits, requests for new cards, food pantries, etc. The other 10% are calls that are escalated to various departments within HRA and DHS for resolution.

Advocate Recommendation**:**
- Make the Infoline Menu easier to navigate and create an easier option for speaking with live staff. Many clients experience difficulty in navigating the long and complicated Infoline menu when they are trying to reach a live person to discuss an issue. HRA must decrease the menu length and make it easier to reach the live staff. [UJC SNA]

Agency Response:
See responses above that address this recommendation. In addition, the Agency has improved access as described below.

In 2019, an ASL Direct agent was hired and the ASL direct line was launched within the Infoline call center. This new video technology provides members of the deaf and hard of hearing communities with an ASL Direct agent who communicates with them in American Sign Language to address their questions and concerns about agency services and benefits.

Infoline continues to hire bilingual call center agents for the HRA call center. Currently, 30 percent of the call center staff are bilingual.

However, we will continue to discuss the issues raised in this section in the advocates work group to continue to improve client services.

IX. MAILING

A. Mail Processing Problems (returned mail):

Issue Raised by Advocates: HRA is quick to close a case when mail is returned rather than first checking its system to see if an address change was made, and delaying the closing until this check has been made.

Advocate Recommendation:
- HRA will improve mailing practices at Income Clearance Program (ICP)

Agency Response:
The Agency will engage in discussions in the advocates work groups about improvements that could be made with respect to the Income Clearance Program.

Advocate Recommendations:

- HRA will not immediately close a case because a mailer has been returned to the Agency as not deliverable;
- HRA will work to ensure that a review of the address that a mailer was sent to, is reviewed prior to closing the case for undelivered mail, as is done with other returned mail.
- Where an address change is evident, HRA will change client's address in the system (and not close the case)

Agency Response:
This is already Agency practice which we will reinforce through refresher training.

The Agency currently has a procedure—PD #10-36-OPE (Process for Returned Mail)—that deals with the process for returned mail. This procedure sets out a comprehensive approach to dealing with returned mail so that client's cases are not closed if the mailing address in the State WMS system is different than the address used to send out the notice or appointment. The Agency will conduct reinforcement training on this policy.

Advocate Recommendation:

- Where DHS has transferred a client to a new shelter, and HRA is aware of the transfer, it will change the client's address in the system.

Agency Response:
We are working with the State to create an automated file transfer that will update not only the client's residential address but also their shelter type, which may affect eligibility for certain benefits.

Advocate Recommendation:

- Where HRA is aware of a client's new address after a move from shelter into an apartment, it will change the client's address in the system.

Agency Response:
This is part of the move-out process. We will reinforce this requirement and we can use any examples that the advocates have to make sure that our procedure is being followed. We will discuss the information that we need to help reinforce this requirement in the advocate work groups.

B. Permission for clients to add a second address:

Issue Raised by Advocates:
For many clients, particularly those in shelters, it is difficult to receive mail.

Advocate Recommendation:

- HRA will permit clients to use more than one mailing address.
  - Legal clarification is still needed on whether receipt by another trusted individual would constitute receipt by the client.

Agency Response:
We will explore this recommendation with our technology teams and our State oversight agency that manages WMS.

C. Appointment notices going out too close to the date of the appointment

Issue Raised by Advocates: Clients are missing appointments because they do not receive the appointment notice before the date of the appointment, particularly compliance-related appointments after a client has won their Fair Hearing.

Notices are often not sent on time. Ex. Someone needs to send in their docs before 11/12 but the letter is dated 10/31, stamp says 11/25 so the client receives the letter too late and the case gets closed.

Advocate Recommendation:
- HRA will build in 2 (or more) business days before the date on the notice for mailing.

Agency Response:
The Agency will look into this issue and recommendation as it relates to Agency-generated appointments, but changes with respect to State-generated notices are subject to State approval.

X. NOTICES

Issue Raised by Advocates:
Many client notices are difficult to understand and do not include specific information about a client's case – leading many individuals to appear at centers to get clarification. This leads to additional crowding at centers.

Advocate Recommendation:
- HRA should work with advocates to revise notices to resolve this.

Agency Response:
The Agency will work with the advocates through the work groups to review notices to make sure that clients can understand them; however, a number of the notices sent to the clients are sent by the State. Agency-developed notices are already put in plain language and reviewed for readability. The Agency will work with the advocates through the work groups to bring potential changes to the State for approval.

Advocate Recommendation:
- Ensuring that notices do not include extraneous information not relevant to the Client, such as notices that include long lists of unchecked boxes (such as the LDSS-4013A and Fair Hearing compliance notices). [UJC/SNA]

Agency Response:
The Agency will to work with the advocates in the work groups on the recommendation regarding Agency notices; however, revisions to State notices must be approved by the State.

Advocate Recommendation:

- Ensure that notices include real information respecting who, where, when and how to contact the Agency or Person for concrete assistance in solving the problem. Many notices include non-working phone numbers or direct clients to phone numbers where they cannot get assistance in resolving the issue, only general information about the case. [UJC/SNA]

Agency Response:
The Agency will work with the advocates through the work groups to review Agency notices.

Advocate Recommendation:

- Improve general readability by decreasing total word count where possible, increasing font size, and putting the most important info at the beginning. Many notices that applicants and recipients receive are long and confusing, increasing the likelihood that people will not understand a requirement or miss critical information. Font size and the number of words on the page are particular problems. The most important information should be highlighted and put at the beginning of the notice, including: identifying the issue, the action to be taken by HRA, what is needed from the recipient, and the recipient's rights. [UJC/SNA]

Agency Response:
We will take these suggestions into account when creating new notices or revising existing notices. We put into place a plain language review before new or revised notices are finalized. All Office of Procedure staff who are responsible for drafting client notices have been trained on the principles of plain language developed by the Mayor's Office. All new forms that have been created since 2017 have been created using a plain language review. In addition, the Agency has been reviewing existing forms and making significant revisions to comply with Local Law 30 which requires documents most commonly distributed to the public to be in a plain language format where possible. This project is still ongoing. We do not control State CNS notices but have worked with the State to revise various notices that we have found confusing for the clients (i.e., SNAP Recertification Notice and the Expedited SNAP Conditional Approval Notice). The Agency will continue to work with the advocates to reform agency forms during our regular advocate work groups and to propose changes in State notices for State approval.

XI. ACCESS HRA

Issue Raised by Advocates:
It is difficult for advocates to receive information about A/R's information and ACCESS HRA. Client Notice System (CNS) notices, issued by the Office of Temporary and Disability Assistance, are not visible on a user's ACCESS HRA account. Clients only see one year of benefits issuances.

HRA presents many aspects of ACCESS HRA as reducing the need for clients to visit Job Centers. HRA does not have the volume of staff to currently serve its volume of clients and yet proposes that ACCESS HRA will reduce the need for more staff at the Centers.

When clients have problems with ACCESS HRA, they must submit an online form and wait for a response.

Advocate Recommendations:
- HRA and OTDA will recognize importance of adding CNS notices to ACCESS HRA and collaborate on an immediate fix to pull CNS notices into the ACCESS HRA system.
- ACCESS HRA will add additional functionality to the “payments” tab/screen that will allow user to view many years of benefits issuances.
- ACCESS HRA “payments” should go back at least 3 years and should be accessible through the Provider Portal and through the client’s ACCESS HRA. This information should include Cash allowance, Shelter, SNAP and Medicaid/Medicare. This would greatly benefit housing advocates during emergencies like evictions. [BLS]
- ACCESS HRA “payments” should provide accurate “period” information for shelter allowance. [BLS]
- ACCESS HRA “payments” should indicate the status of the payment (e.g., cashed, stale, etc.) [BLS]
- ACCESS HRA should include NYCWAY. [BLS]
- HRA will increase and train staff as recommended elsewhere in these suggestions and will not reduce staff based on the traffic or expectation of increased traffic on ACCESS HRA.
- HRA will treat and improve ACCESS HRA as an additional access point for clients, not as a replacement for Center service or in-person services generally.
- ACCESS HRA will provide a hotline for users to call while they are logged on and a trained staff to address problems contemporaneously, as well as to respond to routine questions from users.

Agency Response:
The Agency will consider the above recommendations. However, some of them may require State approval.

XII. RECOUPMENTS

Issue Raised by Advocates: In many instances, the agency has initiated recoupment actions against Cash Assistance cases with notices that do not comply with State regulations. Furthermore, the agency does not always follow its own policy and State regulations when implementing recoupment and collection actions.

Advocate Recommendations:
- Conduct a mass review of cases with current and past recoupment activity and delete all recoupment and collection actions initiated with notices that do not comply with State regulations. Restore all monies recouped.
- Review all cases with recoupment actions and delete recoupment actions that are not supported with evidence that the agency complied with its own policy and State regulations.
- Report on total number of active Cash Assistance cases with active and paid off recoupment actions.
- Report on number of cases containing recoupment actions that were initiated with notices that do not comply with State regulations.
- Report on number of cases which do not contain evidence to support that recoupment activity was initiated in compliance with State regulations and agency policy.

- Report total number of cases in which agency deleted recoupments and restored previously recouped monies, including recoupments that had previously had been paid off.
- Report on total number of cases in which collection action is stopped.

<u>Agency Response</u>:
The Agency is currently addressing some of the above issues around recoupment issues with the advocates in our regular meetings. We will continue these discussions with the advocates to determine if the Agency is taking recoupment actions that should not be taken and how to improve the notices.

In 2015, pursuant to Policy Bulletin #15-98-OPE (Determination of Cash Assistance Recoupment Rate Due to Undue Hardship), at every application and recertification, households with a CA recoupment rate higher than 5%, are given the opportunity to request a review of the recoupment rate if they believe that the recoupment creates an undue hardship on the household. If the existing rate of recoupment is greater than 5%, POS will prompt the worker to offer the applicant/participant an undue hardship review.

Moreover, we are currently exploring with our State oversight agency the ability to remove the necessity of affirmative action from the client in requesting an undue hardship review, and instead rely solely on information available in the case record.

XIII. <u>Improve Services in the Bronx</u>

<u>Advocate Recommendations</u>:
- Hire more staff in the Bronx, perform outreach to Bronx residents for these positions, provide incentives to Bronx staff members to increase retention, and schedule additional staff whose hours include evening shifts.
- Strengthen support for staff at Bronx Centers.

<u>Agency Response</u>:
As soon as the next Eligibility Specialist (ES) and Job Opportunity Specialist (JOS) exams are scheduled, we plan to conduct targeted outreach and marketing strategies in the Bronx to encourage residents to take these exams. Some of the ideas for outreach and marketing include:
- **Targeting CUNY schools and leveraging existing FIA partnerships at these schools**
- **Leveraging Bronx testing sites**
- **Placing ads and stories in local and ethnic media**
- **Using social media posts and marketing**
- **Providing information about selective certification and fee waivers**
- **Including information about the test on Bronx client notices**
- **Sharing information with elected officials to include in their newsletters**
- **Sharing information with CBO partners**
- **Displaying employee videos at Centers and YouTube**
- **Developing tools to leverage Staff as recruiters**
- **Leveraging Bronx coalitions and religious institutions**

We will continue to explore this issue during our advocate work groups.

A Modernization Reform Plan

Over the past six years, the New York City Human Resources Administration (HRA)/Department of Social Services (DSS) has introduced a broad range of reforms aimed at improving client access to benefits and services; reducing homelessness; modernizing systems, services, and processes; and expanding employment and educational opportunities for clients. The purpose of this section is to provide a list of the key initiatives that the Agency has implemented for each year of this Administration, which are aimed at improving the client experience. HRA/DSS remains committed to providing excellent client service to New Yorkers in need and we will continue to leverage the resources needed to streamline operations and lift barriers to benefit access.

2014 Reform Highlights

Improve Access to Benefits and Services:

- Implemented an Electronic Document Submission (EDS) process that allows Supplemental Nutrition Assistance Program (SNAP) clients to conveniently scan their documents. (This process was enhanced on September 30, 2014 through the implementation of a system known as "Easy Access" which allows clients to scan the documents directly into their case records rather than to a file which must be manually transferred to the case record by a Worker.)
- Increased child care return appointments from 5 to 15 days to make it easier for clients to comply.
- Closed Intensive Services Center (ISC 71). Prior to its closing all clients with a Cash Assistance (CA) sanction regardless of borough were forced to travel to the ISC for ten consecutive days (not including weekends) and if they missed a day, the entire family would be denied assistance
- Implemented Friendly Reminder Calls and notices for eligibility appointments such as SNAP/CA Missed Appointment and SNAP Appointment Reminder,
- Extended the time to reschedule a missed CA Recertification appointment by five business days
- Stopped employment call-ins of clients who requested a Fair Hearing (FH) and were granted continuing benefits known as "Aid to Continue (ATC)" for an employment-related infraction
- Altered approach to the Daily Timekeeping System and began allowing five excused absences for Back 2 Work (B2W) and Work Experience Program (WEP) assignments
- Implemented Reminder Calls for Eligibility Appointments - Phase III - CA Missed Appointments
- Implemented the scheduling of Office of Child Support Enforcement (OCSE) (now Office of Child Support Services) appointments 20 days from the date of application
- Conducted Pre-Conciliation Pilot in which clients who failed to comply with employment requirements were no longer subject to automatic sanction, but rather HRA staff would attempt to contact those clients by phone and by mail to reengage them before the sanction process began

- Conducted Pre-Notice of Intent (NOI) pilot to review cases of individuals who fail to comply with an eligibility related appointment and attempt to determine if the closing should be stopped before the notice of intent to close a case form is sent
- Generated a mailing to inform clients of their ability to reduce their CA recoupment rates from 10% to 5%
- Accepted/Implemented the Able-Bodied Adults Without Dependents (ABAWD) Waiver which waived all of New York City from SNAP ABAWD work requirements

Improve Access to Education, Training, and Employment:

- Requested and received approval from the State to permit four-year college to count as an approved CA work activity
- Created an interim process at the Training Assessment Group (TAG) to evaluate four-year college enrollment as an approved work activity
- Developed an attendance tracking process for four-year college students
- Began counting homework time for those in two-year and four-year education programs as a work activity
- Evaluated potential efficiencies/appointment reduction at TAG
- Replaced the Perfect Opportunity for Individual Success and Educational Development (POISED) at home program with the more comprehensive Nurse Family Partnership program which connects new mothers with resources and services, like health insurance, mental health care, child care and educational programs

Reduce Homelessness:

- Established a Centralized Rent Arrears Payment Group at 109 East 16th Street in Manhattan, which streamlined the process for landlords, avoided fraud, ensured consistency, created economies of scale through specialization and expertise and served as a single touchpoint for community and advocates for check receipt/issuance.

Modernizing Services and Processes:

- Centralized the data entry of automated and paper-based transactions for CA and SNAP at the Office of Central Processing (OCP) using the Paperless Alternate Module (PAM)
- Automated Storage Fee Payments

Increase Services for Youth (ages 18-24):

- Assisted youth aging out of foster care by issuing them presumptive CA eligibility letters

Additional Accomplishments

- Matched the most recent client mailing address changes in POS for SNAP, Medicaid (MA), and Health Exchange (HX)

- Implemented higher level approval requirements for Good Cause Not Granted at Conciliations to ensure that Conciliation workers were not improperly denying client good cause requests leading to erroneous case closings
- Reduced the number of Fair Hearing requests citywide
- Initiated the following workgroups consisting of advocates and HRA/DSS staff:
    - Applications Work-Group
    - Undercare Work-Group (Recertification/Engagement/Eligibility Appointments)
    - Fair Hearings and Resolution Processes Work-Group
    - HIV/AIDS Services Administration (HASA) Work-Group
    - Domestic Violence (DV) Work-Group
    - Adult Protective Services (APS) Work-Group
    - Housing/Homeless Prevention Work-Group
    - Lesbian, Gay, Bi-sexual, Transgender, Questioning, and Intersex (LGBTQI) Work-Group

2015 Reform Highlights

Improve Access to Benefits and Services:

- Successfully started a financial counseling pilot for selected service providers whereby financial counseling is integrated into employment services for Cash Assistance (CA) clients
- Ensured that Needed at Home (NAH) status is given to parents who have a child under age four who is receiving Supplemental Security Income (SSI)
- Made sanction call-ins Non-Mandatory Appointments to prevent a full case closing if the client failed to keep their appointment
- Implemented a manual interim supervisory review process prior to taking negative actions on clients granted home visit needed/homebound status
- Developed an automated supervisory review process prior to taking negative actions on clients with a Reasonable Accommodation
- Rolled-out automatic application registration via ACCESS NYC website for Supplemental Nutrition Assistance Program (SNAP) applications submitted online
- Requested and received New York State Office of Temporary and Disability Assistance (OTDA) approval to expedite processing of SNAP cases using self-attested shelter expenses
- Implemented new reduced mandatory engagement hours for parents with children under six years of age
- Submitted a waiver request to the OTDA for verification of identity through an automated online process
- Submitted a waiver request to OTDA for the expansion of Interactive Voice Response Service (IVRS) Recertification to other low-risk groups with no income/case changes
- Submitted a waiver request to OTDA to allow HRA to obtain SNAP applications from inmates in prison
- Submitted a waiver request to OTDA for Online 6-Month SNAP Periodic Reporting

- Submitted a waiver request to OTDA for the expansion of IVRS recertification to low risk households with case changes
- Submitted a waiver request to OTDA for elderly clients/clients with disabilities with no earned income to receive an extension of their certification period
- Submitted a waiver request to OTDA for standard medical deductions demonstrations
- Began monthly Administration for Children's Services (ACS)/HRA Data Match to flag Recertification Appointments and Pending closings for Failure to Recertify
- Successfully managed a Disaster SNAP (D-SNAP) initiative over four weekends in October 2015, offering access to benefits for eligible New Yorkers with disabilities impacted by Hurricane Sandy
- Eliminated durational Cash Assistance (CA) employment-related sanctions and modified the Conciliation and re-engagement process
- Launched a pilot between the Family Independence Administration (FIA) and the Medical Insurance and Community Services Administration (MICSA) to have Certified Application Counselors (CAC) pods on site at SNAP centers to assist applicants and participants with applying for health insurance as needed.

Improve Access to Education, Training, and Employment:

- Launched a pilot to increase availability of Adult Basic Education (ABE), English as a Second Language (ESL), and High School Education (HSE) through Back 2 Work (B2W) vendors
- Developed additional contextualized literacy offerings at B2W
- Evaluated the inclusion of financial literacy in a new service model
- Enrolled CA participants in High School Education (HSE), English as a Second Language (ESL), and Adult Basic Education (ABE) in full-time education as appropriate
- Identified community partners for provision of education, literacy, workforce, and social services
- Implemented the Job Skills Training (JST) at HRA pilot
- Completed Phase I of Work Experience Program (WEP) Replacement which included replacing WEP at City University of New York (CUNY) with work-study and HRA with JST pilot
- Developed HRA's capacity to support high quality experiences for those in WEP-replacement programs
- Created an internship program for students in educational programs beyond 1 year
- Created an internship program for students on breaks between terms
- Released Request for Proposal for new Internship Placement Services program, the replacement for College and Related Experience Work Experience Program (CARE WEP)
- Held an annual learning network event among Jobs-Plus providers with the topic of focus being aligning Jobs-Plus with career pathways

Reduce Homelessness:

- Implemented the new Shelter Exit Transition (SET) Program for single adults in Department of Homeless Services (DHS) shelters
- Initiated the processing of grants for the Special Exit Prevention Supplement (SEPS) handled by the Family Independence Administration (FIA)
- FIA and the Office of Child Support Services (OCSS) collaborated to ensure that shelter clients can access the Family Eviction Prevention Supplement (FEPS)

Modernizing Services and Processes:

- Created one source for online SNAP applications and recertifications by directing the NYS Benefit application to the Access NYC website
- Developed an Electronic Funds Transfer (EFT) system for Con Edison Payments citywide
- Implemented the centralization processing of City FEPS payments at the Centralized Rent Processing Unit (CRPU Center # 71)
- Rolled out the pre-screening for expedited SNAP benefits via the Access NYC website for SNAP applications submitted online
- Began the online SNAP recertification pilot at the Rockaway Center PC bank.
- Piloted self-service document scanning and check-in at the Waverly Job Center/SNAP Center
- Piloted a program to implement the use of video remote interpreting at Job Centers and SNAP Centers, which may be used in place of in-person interpreters when agreed to by clients
- Requested United States Department of Agriculture (USDA) Waiver to allow the use of SNAP e-notices
- Piloted self-service document scanning and check-in at the Dekalb and Dyckman Job Centers and the North Brooklyn and Washington Heights SNAP Centers
- Expanded the self-service scanning solution to 12 SNAP Centers and 5 Job Centers
- Implemented the Mobile Document Upload method of document submission via a smart telephone or tablet for SNAP clients citywide
- Expanded online SNAP recertification pilot to all SNAP Centers with a PC bank

Increase Services for Youth (ages 18-24):

- Developed a fillable version of the FIA School Training and Enrollment Letter (W-700D) to eliminate the need for in-person submission and reduce administrative burden on participating training and educational programs (particularly CUNY) in verifying enrollment and hours of participation
- Created an Office of Youth Engagement to manage youth services and develop and maintain partnerships and relationships with community providers
- Provided Presumptive Cash Assistance (CA) budget letters for minors 18 years of age or older aging out of foster care and shared the details with the ACS team
- Initiated centralized intake of CA applications for youth aging out of foster care

- Developed a new youth engagement model and services, including expanded external partnerships
- Successfully brought on board an Urban Fellow, to focus on partnerships for youth services
- FIA, OCSS, and MICSA collaborated with ACS to Provide Meaningful Summer Internships for College Students in Foster Care

Additional Accomplishments

- Piloted Selective Case Review (a quality assurance methodology for supervisory review of cases) for SNAP
- Began listing the month due date on the CA Eligibility Mailer return envelope to encourage more timely responses
- Began ensuring that FIA refrain from implementing any new procedures utilizing "autoposting" for Negative Case Actions
- Expanded HRA's capacity for managing relationships with external partners and community providers
- Developed phase 1 of the services redesign plan to pilot new service delivery models with inter-agency partners and co-locations
- Developed a simple one-page fact sheet that outlines childcare rights to be carefully reviewed with parents when initial childcare return appointments are issued
- Developed a new employment assessment tool
- Released concept papers for new employment services and received feedback from providers and other stakeholders
- Submitted DSNAP II Waiver Request to OTDA
- Trained staff with client contact on the methods used by clients who are deaf and hearing impaired to communicate by telephone
- Initiated the following monthly meetings between HRA/DSS Operations and client advocates:
    - SNAP Work-Group
    - Immigrant Access Work-Group
    - Disability Advisory Panel
- Successfully brought on board an AmeriCorps Volunteers In Service to America (VISTA) Member, to focus on financial counseling integration into HRA services
- Provided new Notice language to OTDA for its SNAP recertification notice (Z95), SNAP recertification reminder notice (Z96), and SNAP notice that recertification was received, and interview must be completed (Z99) notices
- Implemented Friendly Reminder Calls for Six-Month CA Eligibility Mailer reminder calls
- Initiated monthly meetings between FIA, other HRA programs and advocates regarding immigrant access issues
- Completed review of multi-suffix cases to determine which clients might be eligible for separate SNAP cases
- Revised Income Clearance Program (ICP) practices regarding returned mail to ensure thorough research is done prior to closing a case

- Evaluated daily attendance standards and requirements for Career Services programs
- Designed new applicant engagement model with revised requirements
- Developed an instructional mailer insert on how to complete the six-month CA eligibility mailer
- Initiated a launch of quarterly seminars to improve immigrant eligibility expertise among FIA's immigration liaisons
- Developed a procedure reminding workers they have a duty to assist applicants who need help in securing required documentation
- Completed comprehensive planning and implementation activities necessary to launch the On-Demand initiative for SNAP recertification interviews, beginning January 2016
- Implemented a backend system process that matches cases with pending adverse actions with core documents returned prior to the case closing, alerting staff to review the documents and stop the adverse action if appropriate
- Requested OTDA waiver to grant 24-Month Recertifications to non-legally responsible relative payees for CA Child Only cases
- Established an automated interface between OCSS & SNAP which provides Child Support income and helps to reduce SNAP payment errors
- Provided training on Veterans benefits to FIA, OCSS, and MICSA staff

2016 Reform Highlights

Improve Access to Benefits and Services:

- Launched Supplemental Nutrition Assistance Program (SNAP) On Demand which allows SNAP clients to submit their recertification form then call an "On Demand" service for an interview
- Piloted the new online Cash Assistance (CA) application and recertification in Personal Computer (PC) banks at select Job Centers. This was done in coordination with the Office of Business Process Innovation (BPI), Management Information Systems (MIS), Office of Policy, Procedures, and Training (OPPT), and other HRA program areas
- Centralized home visits and reasonable accommodation request monitoring to ensure program efficiency and provide an additional layer of assistance to vulnerable New Yorkers
- Began decentralizing East River and Senior Works Job Center cases to reduce burdensome travel hardships for Brooklyn, Queens, and Staten Island clients who were assigned to those locations. Manhattan and Bronx cases were transferred in 2017
- Established the Automated Finger Imaging System (AFIS) Freedom initiative. AFIS Freedom allows eligible CA clients to get finger imaged at any Job Center within the five boroughs. (Subsequently – in 2019 – we successfully advocated for the State to end the eligibility fingerprinting requirement effective in 2020.)

Improve Access to Education, Training, and Employment:

- Eliminated the Work Experience Program (WEP) and developed tailored employment programs to meet the individualized career, educational, and personal needs of clients
- Updated the online Training Provider Tracking System (TPTS), which is used to track engagement and attendance information for clients enrolled in an Agency-approved educational or training activity. This was in an effort to increase accountability and enforce stricter standards for schools and training providers. These updates include the following new features:
  - Financial Aid and Student Loan Information section for each school/provider with an automatic flag which transfers an alert to HRA's public facing site for schools/providers reporting Federal/State Loan Default Rate exceeding the 30% national cohort rate
  - Capability for Training Assessment Group (TAG) staff to view drop-down options to enter cautions for the provider and program registration screens which support necessary data collection for future program accountability review and determinations
  - Additional fields for more detail on program costs including cost per semester and/or cycle to provide clients with a better picture of financial obligations to be expected with school enrollment
- Implemented an assessment for all "first time" Educational Services clients to determine who should be routed directly to financial counselor to discuss debt and other options for financing an educational program
- Awarded a series of contracts for three new employment programs: YouthPathways, CareerCompass, and CareerAdvance. These programs connect CA clients with the jobs, training or education that suit their needs and skills to help them build a career and become financially independent. In total, more than 68,000 HRA clients benefited from these programs annually
- Expanded the Jobs-Plus program to the Penn-Wortman Houses in Brooklyn
- Out-stationed FIA staff to the Department of Small Business Services (SBS) Washington Heights Workforce1 Center to provide public benefits assistance and employment services to targeted members of the public

Increase Services for Youth (ages 18-24):

- Collaborated with SBS and the Department of Education (DOE) to open the West Farms Workforce1 Career Center, which provides youth and young adults with integrated support to access and navigate public benefit programs, enroll in high school equivalency preparation, and connect to meaningful job and training opportunities
- Re-branded the City University of New York (CUNY) College Opportunity to Prepare for Employment (COPE) program as "CUNY Educate Develop Graduate Empower (EDGE)" and restructured it to give students who have already earned college credits more targeted and intensive assistance to help them earn their degrees in one year
- Developed a referral process to the CUNY Accelerated Study in Associate Program (ASAP) to increase client graduation rates. CUNY ASAP assists students in earning an Associate's degree within three years by providing a range of financial, academic, and other supportive services

- Organized HRA's first Youth Leadership Council as part of the Mayoral Youth Leadership Conference (MYLC). HRA's Youth Leadership Council provides an opportunity for youth to participate in and influence policy at HRA

Reduce Homelessness:

- Began providing employment services to residents at the 30th Street Shelter in Manhattan
- Expanded the Shelter Exit Transition (SET) program to include families with children
- Developed a targeted Job Training Program (JTP) for homeless clients

Modernizing Services and Processes:

- Established the Centralized Indexing Unit (CIU) which was responsible for all of FIA's scanning and indexing functions
- Collaborated with Management Information Systems (MIS), General Support Systems (GSS), and other agency partners to institute self-service scanning areas installed at seven SNAP centers and at eight Job Centers
- Installed self-service check-in kiosks at one stand-alone Job Center, one stand-alone SNAP Center, and five co-located Centers
- Launched the CA Mobile Document Upload. This application allows applicants and participants to upload agency requested documents via mobile device. CIU receives all CA Mobile Document uploads as part of FIA's efforts to centralize scanning and indexing functions
- Implemented a Video Remote Interpretation pilot at Queens Job Centers that allows language interpretation to be conducted via live video conference

Additional Accomplishments

- Implemented an AHRA 'DV view' which hides address information on AHRA for confidentiality purposes, including client profile information with their residential and mailing address, phone number, email address, addresses where payments are mailed/sent, including landlord addresses, addresses for client appointments and E-notices which include client addresses (expanded in January 2020 to allow any AHRA users to opt-in to hide their address information online)
- Received a three-year grant of $360,000 for an HRA staff development project focusing on social work best practices
- Collaborated with MIS to provide six SNAP notices in alternative formats including braille for clients with a vision disability
- Initiated the following monthly meetings between HRA/DSS Operations and client advocates:
    - Language Access Workgroup
    - Urban Justice Center/Safety Net Advocates Workgroup

Improve Access to Benefits and Services:

- In conjunction with Benefits Data Trust (BDT) the Supplemental Nutrition Assistance Program (SNAP) launched the "Guardrails" project, which sends strategically timed communications (email and phone) to SNAP applicants and clients that have not yet completed their recertification or new application process
- Launched ACCESS HRA (AHRA), transitioning from ACCESS NYC, allowing for an HRA-focused client interface, which was developed to assist SNAP clients in accessing HRA services through a mobile application
- Added the following additional functionality to AHRA: e-Notices (displays HRA notices electronically), My Cases (displays case information), My Documents (displays the types of documents uploaded) and the ability to verify identity using a set of questions through Lexis-Nexis
- In coordination with the Business Process Innovation (BPI), Management Information Systems (MIS), Office of Policy Procedures and Training (OPPT), and other HRA/DSS program areas, FIA opened six new Job Center PC Banks with the ability to submit online Cash Assistance (CA) applications and recertifications
- Successfully decentralized Shelter and Senior cases. Both East River and SeniorWorks Job Centers closed, and all cases were successfully transferred to Centers in the communities where the clients reside
- Alongside the Department of Small Business Services (SBS) the Washington Heights Workforce1 Center successfully launched and enrolled candidates into three pre-training programs, Commercial Driving and Bilingual Medical Assistant, and Web Development
- Opened a new Job Center in the Bronx; Concourse Job Center is co-located at 1365 Jerome Avenue with the Concourse SNAP Center
- FIA along with its DSS partners in OPPT, Fair Hearing Unit (FHU), Management Information Systems (MIS), and Office of Legal Affairs (OLA) developed a process and workflow for implementation of the new "pre-conciliation" requirements
- Launched the On-demand SNAP application process in Brooklyn which allows SNAP clients to submit their applications online and then call an "On Demand" service agent for an interview
- Launched an HRA Express Demonstration Site. This pilot has aligned services/interactions across HRA programs for select high-demand services which will allow for better client experiences and will assist clients receive and keep their benefits
- Launched Benefits Data Trust (BDT) Accelerated SNAP Enrollment pilot for Medicaid clients in Brooklyn. BDT reached out to Medicaid recipients who are not currently in receipt of SNAP to offer assistance with the submission of a SNAP application. This initiative will allow SNAP to use current documentation already located in the HRA OneViewer; therefore, there will be minimal additional requests

Improve Access to Education, Training, and Employment:

- Spearheaded a collaboration to partner with existing workforce development organizations, City agencies, non-profits and private foundations to launch the new Alternative Engagement (AE) model which offers CA participants workforce development and education assignments outside of those traditionally offered by TAG

- Successfully launched a pilot to accelerate re-enrollment process for returning students and ensured there was no interruption in carfare while also reducing the in-office client flow during the peak season of CUNY EDGE (Educate. Develop. Graduate. Empower.) students
- In collaboration with the Jewish Community Council of Greater Coney Island (JCCGCI) launched INTERN NYC, offering subsidized internship opportunities for CA recipients enrolled in college
- Expanded Jobs Plus services to four new New York City Housing Authority (NYCHA) developments including the City's first HUD-funded site in East New York, Brooklyn. Services were also expanded in East Harlem and the South Bronx. Between March 2013 and December 2017, Jobs-Plus sites have enrolled nearly 16,000 residents into its program, placed over 6,000 into jobs and helped over 7,000 NYCHA residents to achieve an outcome related to training, education, or financial counseling
- Replaced HRA's VendorStat accountability reviews with contracted employment vendors with CareerStat to engage in more nuanced discussions about program performance and service delivery which has positively impacted outcomes for clients

Reduce Homelessness:

- Successfully piloted a State Family Homelessness Eviction Prevention Supplement (FHEPS) program which streamlined rental assistance subsidies by replacing the State Family Eviction Prevention Supplement (FEPS). Under FHEPS the maximum rent allowed has increased and is based on a sliding scale according to the CA family size

Modernizing Services and Processes:

- Implemented Short Message Service (SMS) text messages through ACCESS HRA for SNAP and CA Cases; clients can now receive messages and notifications regarding their SNAP and CA applications and cases. Messages are available in the Local Law languages
- Expanded the Selective Case Review (SCR) pilot to include Telephone Interview Processing Services (TIPS) 42; the pilot was expanded so recertification cases processed through the On-Demand interview process could be considered for transmission directly to Welfare Management System (WMS) and speed up processing time
- Launched Streamlined Paperless Office System (SPOS) for all home centers, the Special Population Center #61, and TIPS 42 applications agents, which decreases the length of interview and decreases deferrals for documents
- Began sending emails to remind SNAP clients to submit their recertification or complete their phone interview
- Assisted with the implementation of paperless referrals to the Office of Child Support Services (OCSS) in order to lift child support related CA sanctions
- Restructured the bid proposal for vendors that provide Immediate Needs Clothing vouchers for a wider competitive pool
- Successfully added the SNAP Periodic Report to ACCESS HRA (AHRA). This process allows clients to submit their Periodic Report mailers online using the AHRA website or app and it also ensures immediate submission and rapid case attachment. Previously, periodic reports were mostly mailed to the Center, which required scanning and indexing
- Launched the following new data system enhancements in the New York City Work Accountability and You (NYCWAY) system:

- Job Matching system – allows providers to access Job Postings from HireNYC and Business Link
- New Education Services assessment Employment Plan database - This replaced the old database and integrated TAG with the new Tier III Assessment
- Partner Portal training repository - This portal allows outside agency partners to enter their training classes for provider access
- New Training Repository- This repository allows HRA to share all Alternative Engagement (AE) opportunities with providers and allows providers to match clients to available classes

Additional Accomplishments

- Implemented a receipt for clients which provides them confirmation of their Center visit
- Collapsed the Applications Work-Group and Undercare Work-Group from two separate work-groups, into a single work-group

2018 Reform Highlights

Improve Access to Benefits and Services:

- In coordination with the Department of Social Services (DSS) Business Process Innovation (BPI), Information Technology Services (ITS), Office of Policy, Procedures, and Training (OPPT), and other Agency program areas, Family Independence Administration (FIA) implemented online submission of Cash Assistance (CA) applications and recertifications at PC Banks in four additional Job Center sites. Now, ten Job Centers throughout the City have PC Banks for clients to submit CA applications and recertifications
- Finalized the rollout of “Model Office” technology for tracking and monitoring client traffic in Job Centers
- With the assistance of its partners at BPI, ITS, OPPT, and Office of Advocacy and Outreach (OAO), FIA launched its CA Online Application pilot at 14 Community Based Organizations (CBOs) in the Bronx and other identified locations. This pilot allows clients to apply for and submit a CA application online outside of HRA offices; thereafter, the applicant can go to any of HRA’s Job Center offices to complete the eligibility interview process
- Implemented the newly-developed mental health/disability screening tool at five Job Centers (Fordham, Jamaica, Coney Island, Waverly, and Richmond). The purpose of the disability screening tool is to elicit and identify any mental or physical issues applicants may present during the CA application and recertification processes. Screened clients who appear to have a disability can receive a Reasonable Accommodation (RA) as part of an effort to ensure that these barriers do not negatively impact the client’s access to or receipt of CA benefits or services
- Following the enactment of Social Services Law §§ 341-a, 342-a in December 2015, FIA along with its partners in OPPT, Fair Hearing Administration (FHA), ITS, and OLA, concluded a two-year initiative for the development and implementation of the new “Pre-Conciliation” and “Conciliation” processes and requirements to impose a CA and SNAP sanction. FIA Operations and Career Services collaborated with OTDA on implementation of the forms, processes, policy and system edits to launch the new processes on January 15, 2019. Now, sanctioned clients can reengage with their CA work requirement immediately to obtain critical employment services needed to become self-sufficient

without a durational sanction period. Additionally, Conciliation appointments will not be held just at Job Centers as before, but also at HRA's contracted employment vendor locations and Career Services' Education Services office. This expansion enables clients to more easily avail themselves to the Conciliation process, reconnect with their employment services, and also avoid a disruption of their CA and SNAP benefits

- Executed ACCESS HRA system edits to the CA recertification online form, so that a client can update their landlord information only if the client indicated that changes were needed, as a safeguard to prevent the accidental deletion of current landlord information and consequent payment issues
- Converted manual CA determination notices that Job Center workers completed to automated OTDA-generated Client Notices System (CNS) notices on single suffix cases. This ensures that applicants will receive adequate notices of decision containing the reason and explanation for the determination
- Following the loss of the lease for one of our offices, FIA Division of Job Support Services (DJSS) along with its partners at General Support Services (GSS), ITS, OPPT, and various other stakeholders successfully relocated the: Family Services Call Center (FSCC) Brooklyn Satellite office from 275 Bergen Street, Brooklyn, New York to 404 Pine Street, Brooklyn, New York; and the Dekalb Job Center from 500 Dekalb Avenue, Brooklyn, New York, to 275 Bergen Street, Brooklyn, NY. As part of the relocation, FIA also included a ZIP Code realignment to redistribute caseloads to avoid overcrowding at any one location
- Launched Selective Case Review (SCR) for SNAP cases citywide. This is the process in which low-risk SNAP cases do not require supervisory review and approval for the transaction to be entered. This allows SNAP supervisors to concentrate their time and resources to manage staff and provide better customer service
- Completed the full citywide rollout of "On-Demand" SNAP Application and Recertification eligibility interviews. This process allows New Yorkers applying or recertifying for SNAP benefits to be obtain such benefits without having to step inside an HRA office
- FIA worked closely with the New York State (NYS) Office of Temporary and Disability Assistance (OTDA) to fix the process for discontinuing SNAP benefits if the client failed to timely recertify. Now, a WMS closing code (Y66 – Failure to Recertify), will be posted on the 10th, rather than 25th day, of the month following the expiration of the SNAP certification period. Clients receive a notice of expiration which lets them know the date by which they have to recertify to avoid an interruption in benefits.
- Implemented a process for CA clients who have an expiring CA exemption from employment requirements to request an extension and submit verifying documentation without coming into a Job Center. Implementation of this process minimizes in-person eligibility appointments, which could cause a case closing if the client failed to report

Improve Access to Education, Training, and Employment:

- Starting December 2018, the first New York City (NYC) Department of Education (DOE) District 79 (D79) teachers were placed on-site at a YouthPathways provider at a South Bronx site. D79 teachers were embedded within the site to offer full-time education to YouthPathways participants
- Career Services' Job Training Program (JTP), in partnership with the Department of Sanitation (DSNY), introduced a second shift for full-time maintenance positions. Now, in addition to the 7AM to 3:30PM shift, a new 8:00am to 4:30pm shift was introduced within the DSNY-Outdoor JTP program. Within six months of this pilot, attendance increased 126% in the ten districts where the second shift was introduced, compared to the same

period last year. Total enrollment for all sites in the DSNY-Outdoor program also increased by 22% in comparison to the same six-month period last year

- In an effort to publicize education and training as a means to satisfy CA employment requirements, Career Services' Education Services published the "Education For All" (Form FIA-1064c) Informational Flyer to let clients know their various options to participate in education programs. Additionally, to steer CA clients away from predatory for-profit colleges, Career Services' Education Services developed "What You Should Know" Education Fact Sheets, which inform clients about the many aspects of the College Enrollment Process
- Expanded the Alternative Engagement (AE) network to include 49 partner organizations that collectively provide 189 programs. Each partner accepts referrals of CA clients assessed at CareerPathways locations. Leveraged Strategic Program Operations Target (SPOT) goals to motivate Career Services providers to increase relationship development with Internship and Community Service sites, which permits more CA clients to participate in valuable Internship and Community Service experiences and positions. In December 2018, there were 162 Community Service and 127 Internship sites available to clients, each developed by contracted Career Services providers
- Jobs-Plus providers continued to enroll new members. Since March 2013, Jobs-Plus sites have enrolled over 19,000 residents into the program, placed nearly 8,000 residents into jobs and helped nearly 7,000 residents to achieve an outcome related to training, education, or financial counseling
    - In advance of a release of a Request for Proposals (RFP) for Jobs-Plus, HRA participated in a number of stakeholder feedback sessions, using design principles recommended by the Nonprofit Resiliency Committee. HRA and NYCHA conducted outreach to key stakeholders that include New York City Housing Authority (NYCHA) residents, current Jobs-Plus providers, training providers, City agencies, and subject matter experts
- FIA Contracts and Budgets worked with DHS and Business Link to design the Landscaping Request for Proposal (RFP) for a proposer to develop a program and administer a six-month landscape maintenance training program (offered twice a year) for eligible Cash Assistance adult clients residing in a DHS or HRA Domestic Violence (DV) shelter. This program will run for three years and have over six cycles. Under the Landscape Maintenance Training Program, the proposer will provide horticultural focus training that will include, and not be limited to, property beautification, landscape management, planning/basic techniques and garden design- pruning trees and hedges; soil preparation; forestry, nursery, and planting

Reduce Homelessness:

- Successfully transitioned the former State Family Eviction Prevention Supplement (FEPS) to the new State Family Homelessness and Eviction Prevention Supplement (FHEPS). The transition resulted in all FHEPS determinations made at HRA and all rent arrears or new apartment request issuances managed through FIA's Centralized Rent Processing Unit. The centralized check process allows for closer tracking and monitoring of issuances to ensure that approvals are timely issued. The maximum rent allowed is higher under this program and is based on a sliding scale according to the CA family size
- Along with partners from Homelessness Prevention Administration (HPA) and HRA's Office of Supportive and Affordable Housing Services, FIA has worked to provide centralized and coordinated appointments for residents of their "Master Lease" housing locations to apply

for and streamline rent arrears applications to ensure that the providers do not initiate eviction proceedings for the clients residing in these locations
- In October 2018, DSS successfully streamlined multiple rent subsidies into one new rental subsidy program, CityFHEPS.

Modernizing Services and Processes:

- Secured NYS OTDA approval and worked with ITS to implement a Mobile POS solution allowing staff conducting home visits to complete CA applications and recertifications instantly on a tablet, rather using a paper application and then waiting to return to a Center to data-enter the information into POS
- Collaborated with OTDA and ITS to implement a real-time identity verification process through a Social Security Number (SSN) match with a State database. This system assists FIA in providing Immediate Needs Grants and expedited-SNAP services to clients who validate their SSN without further documentation
- CAS, ITS and Career Services successfully began development of the Self-Sufficiency Employment Assesment Management System (SEAMS), a case management system, which will be released in three implementation phases: Wellness Comprehensive Assessment Rehabilitation and Employment (WeCARE), Common Modules shared between WeCARE/Career Services, and Career Services. Full launch of SEAMS is expected between June 2020 and December 2020
- Education Services staff allowed electronic submission of training documents from CUNY EDGE students for the Summer and Winter 2018 semesters, easing the process of student enrollment and decreasing the need for clients to come into an HRA location to submit this documentation

Additional Accomplishments:

- FIA Operations lead the way and won New York City’s municipal agency drive to secure the most client voter registrations on National Voter Registration day. The Waverly Job Center and co-located SNAP Center in Manhattan received first place honors with second place going to the Crotona Job Center in the Bronx
- Career Services concluded its second successful Youth Leadership Council cycle, engaging young New Yorkers for a year of biweekly meetings. Their work culminated in the creation of a Lesbian, Gay, Bisexual, Transgender, Questioning, and Intersex (LGBTQI) training video to encourage allyship among DSS staff

2019 Reform Highlights

Improve Access to Benefits and Services:

- Successfully advocated for the State to end the eligibility finger-imaging requirement for Cash Assistance (CA) applicants/recipients
- Launched citywide process to give clients temporary “Vault” Electronic Benefit Transfer (EBT) cards which can be used to redeem Supplemental Nutrition Assistance Program (SNAP) and Cash Assistance benefits until they receive their permanent Consumer Benefit Identification Cards (CBIC) through the mail

- Revised the “You Must Submit Documents For Your SNAP Case!” (FIA-1146) notice to help clients better understand what documentation must be submitted to complete the SNAP application
- Revised the New York State (NYS) Client Notification System (CNS) Expedited-SNAP Servicing notice, so clients are reminded that additional documentation is needed to establish eligibility for ongoing SNAP benefits
- Piloted the Internet Quorum (IQ) inquiry/complaint tracking system at the Queens Job Center and Hunts Point SNAP Center, to better handle client complaints and issues and offer faster turnaround (citywide rollout will occur in 2020)
- Expanded the SNAP Interactive Voice Response System (IVRS) process to permit SNAP households with participants aged 55 and older or with disabilities without earned income to recertify through IVRS
- Implemented an easier security voucher redemption process for landlords of deceased CA clients whose tenancy was in effect on the date of death

Reduce Homelessness:

- Transitioned the responsibility of Family Homelessness Eviction Prevention Supplement (FHEPS) eligibility determination and approval from Community Based Organizations (CBOs) to HRA/DSS
- Implemented Streamlined Rent Arrears Process in which Job Centers handle all Emergency Assistance / One Shot Deal (EA/OSD) rent arrears requests for amounts less than $7,200 and less than 6-months of arrears without referral to the Rental Assistance Unit (RAU)
- Developed a Homelessness Prevention Administration (HPA) approval process for Congregate Care residents who have excessive rent arrears

Modernizing Services and Processes:

- Launched the AHRA online application for Single Issue (SI) grant access
- Added the SNAP Case Change Reporting form to AHRA to allow online submission of submit case changes
- Rolled out SNAP Telephone Interview Processing Services (TIPS) On-Demand satellite units to five in-person SNAP Centers to ensure that telephone interview services would be available at various locations in case a site goes down
- Implemented On-Demand “Processing Pods” in SNAP TIPS On-Demand Centers, allowing On-Demand staff to vary their work and understand the processing part by spending every fifth workday processing SNAP applications, increasing work satisfaction and decreasing processing errors

Additional Accomplishments:

- Standardized training curricula for Office of Support Services (OSS) New Hires, and trained current OSS on unit procedures and Cash Assistance and SNAP program eligibility
- Revised Cash Assistance Periodic Mailer Form M-327H to simplify CA interim reporting requirements and remind participants to sign form (pending OTDA sign-off)
- Migrated Brad H. Rikers prisoner pre-release CA process into Paperless Office System (POS) to facilitate application processing and tracking

- Completed specifications to migrate additional Office of Central Processing (OCP) tasks, including Landlord Security Voucher redemption, Utility Grant payments, and Child Support Payments into POS
- Implemented Income Clearance Program (ICP) module in the POS to assist staff in processing actions and to better monitor unit workload
- Designed new reports to improve quality of case processing and procedural excellence, including but not limited to: the weekly worklist for engaging second adults on CA cases and the weekly report for Special Services on the status of potential Human Trafficking Victims receiving HRA services
- Established a quarterly convening between HRA/DSS and the Columbia University Center for Justice to streamline access to benefits and services for formerly incarcerated clients
- Published a new procedure outlining the actions to be taken by management, staff, HRA Police, and Contracted Security Guards in responding to Center incidents, while ensuring all clients are treated with courtesy, compassion, and respect
- Launched an anti-bias and trauma-informed training program
- Retrained and provided enhanced training for the HRA Office of Police Operations (HRA OPO)
- Rolled-out the Body Worn Camera (BWC) initiative for HRA PD staff

<u>Client-Centered Reform</u>

As we reorganize services to improve and streamline how we connect our clients to benefits/resources, it is important to note the channel shifts we are seeing in how New Yorkers are now accessing their benefits via the ACCESS HRA platform:

  - 88% of New Yorkers are now choosing to access benefits through ACCESS HRA and 97% are now conducting SNAP interviews over the phone.

- Citywide SNAP in-center foot traffic has declined by more than 50% since 2014, largely driven by the increased use of ACCESS HRA.

- The percentage of SNAP applications submitted online increased from 23% in 2013 to 88% in 2019.
  - 80% of those applications are submitted out-of-center, with the remainder submitted online at DSS-HRA kiosks and PC banks within HRA centers.
    - Meaning approximately 70% of all SNAP applications are submitted online and out-of-center.

As we continue to implement technology changes to eliminate or reduce the need to come into a Center, these client-centered reforms, transitioning to digital service delivery, and modernizing the Agency's delivery of services have helped reduced wait times, freeing up staff to focus on cases that require more in-person contact.

<u>No Wrong Door – Modernizing HRA's Offices and Locations</u>

The agency's long-term goals include ensuring HRA is located in the communities of the greatest need by right-sizing our current client-facing locations and relocating into areas of highest need. In executing this strategy, we are implementing new service delivery models to better meet client needs. Further, as we move away from a specific program-focused (each program operates separately) service-delivery approach to a more client-centric, "no wrong door" approach we are increasing opportunities to co-locate with other agencies and community-based organizations (CBOs) to leverage community-based outreach and resources. And finally, we are maximizing use of technology wherever possible.

HRA has embarked on an endeavor called “Client Services Re-engineering” whose mission was to:

- Improve client service;
- Develop a self-directed service model; and
- Realize operational and cost efficiencies, while maintaining integrity, through the use of modernized technology and simplified business processes and policies.

The HRA footprint changes are occurring in the context of our work to decentralize the way in which clients access benefits and to eliminate or the reduce the need to receive assistance at a bricks and mortar building. We are also achieving better use of our physical footprint as a result of modernization efforts, including evolving use of technology, updates to caseload and matching our physical footprint to the geographic locations of our clients, and other advances such as increased partnership with CBOs.

HRA’s spatial portfolio constantly evolves due to multiple factors. These include, but are not limited to:

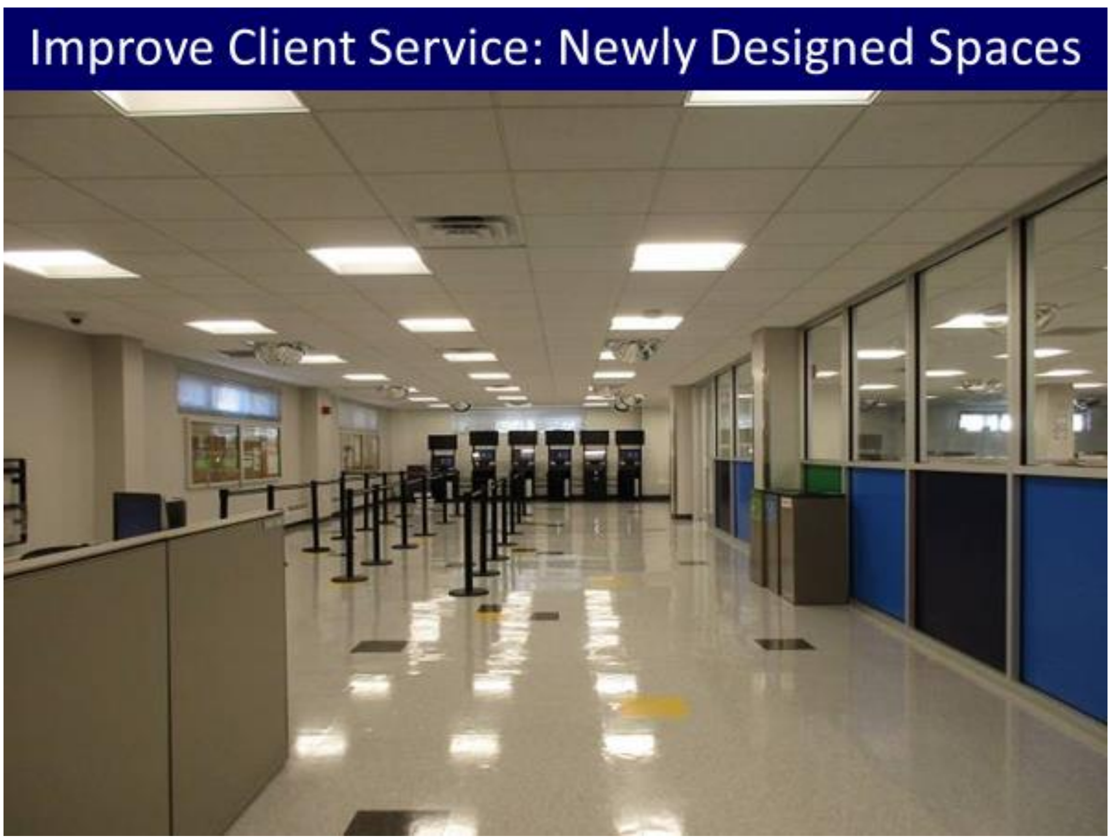
- Changes in response to Agency’s services redesign as related to social service programs
- Changes in response to technology advancements, eliminating or reducing the need for in-person Center visits
- Expiring leases
- Mutual Agency and landlord’s agreement to renew a long-term lease at a facility
- Agency decision to relocate to a new, more modern facility
- Landlord’s decision to change a facility to non-City (i.e., commercial) use
- Changes in response to types of social service programs provided
- Need to create new or relocate existing service Centers to areas where HRA clients live and need them most

New and Improved Technology

As noted, the goal of our modernization effort is creating a self-directed service model that allows applicants and clients to transact their business with the Agency without the burden of having to physically come to an HRA location. Over time these investments will help remove real barriers to access and make it easier for clients to apply for and maintain their benefits, and, at the same time, save on expensive lease costs in areas where there is no longer a concentration of clients. There are many perspectives to consider as we work to realize our modernization goals. From a logistics and planning perspective, we face lease expiration dates, uncertainty of getting new leases at an existing sites, the need to re-site programs in a different area to better meet the geography of where clients live in a changing city, and/or an opportunity to move to a more modern site that we learn about through the Department of Citywide Administrative Services (which negotiates leases for HRA) that might line up with an impending lease expiration at another site.

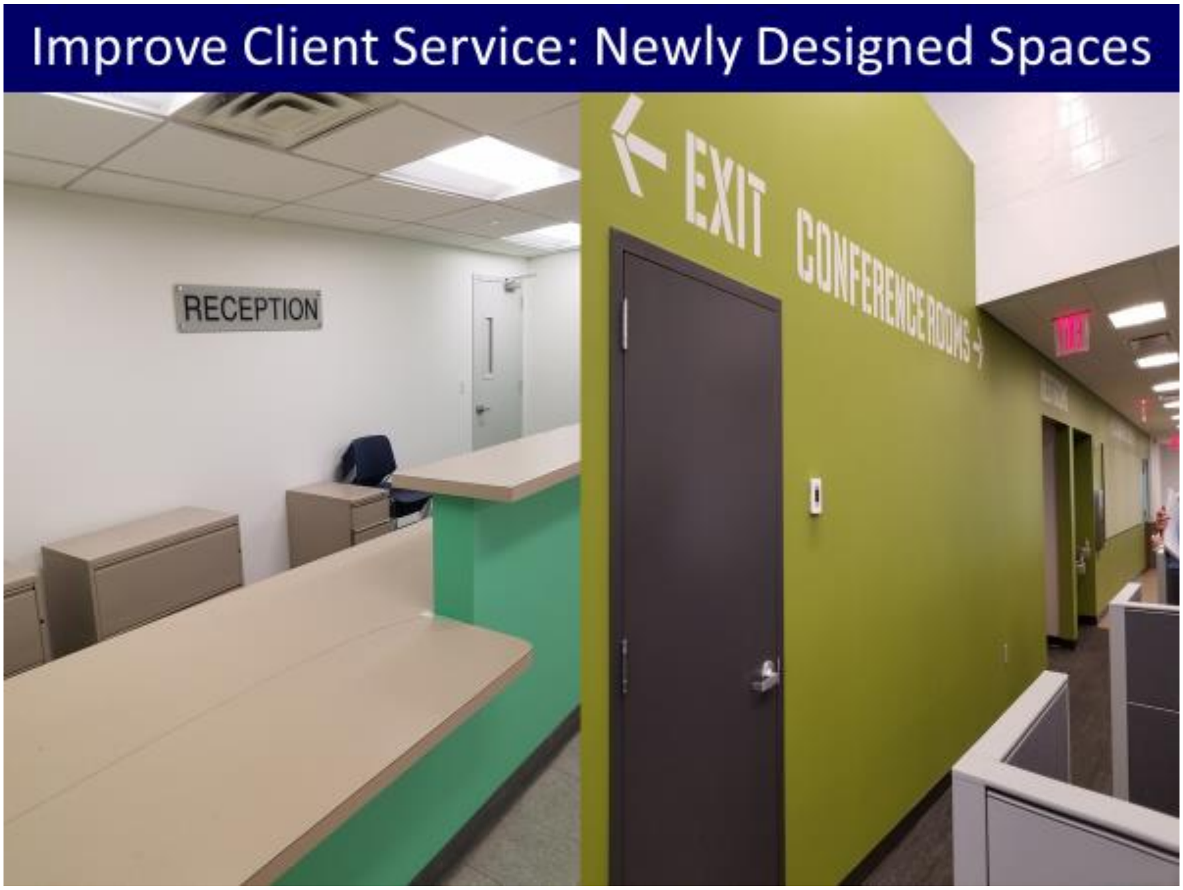
Changes in service provision at various HRA Centers is determined through careful consideration of a variety of metrics including proximity of one Center to another, capacity and building features such as horizontal floor plans to increase efficiencies and adequate waiting areas, elevators and other accessibility features as well as the ability to comply with local laws requiring public facing location rooms and child friendly wait spaces in addition to our Children's Corners. Additional building features are also taken into consideration in order to house PC Banks, Self-Service Kiosks and other technology clients utilize to facilitate access to their benefits. Additional metrics include client travel times/travel analysis, Certificate of Occupancy requirements, and caseloads at locations.

HRA's Modernization

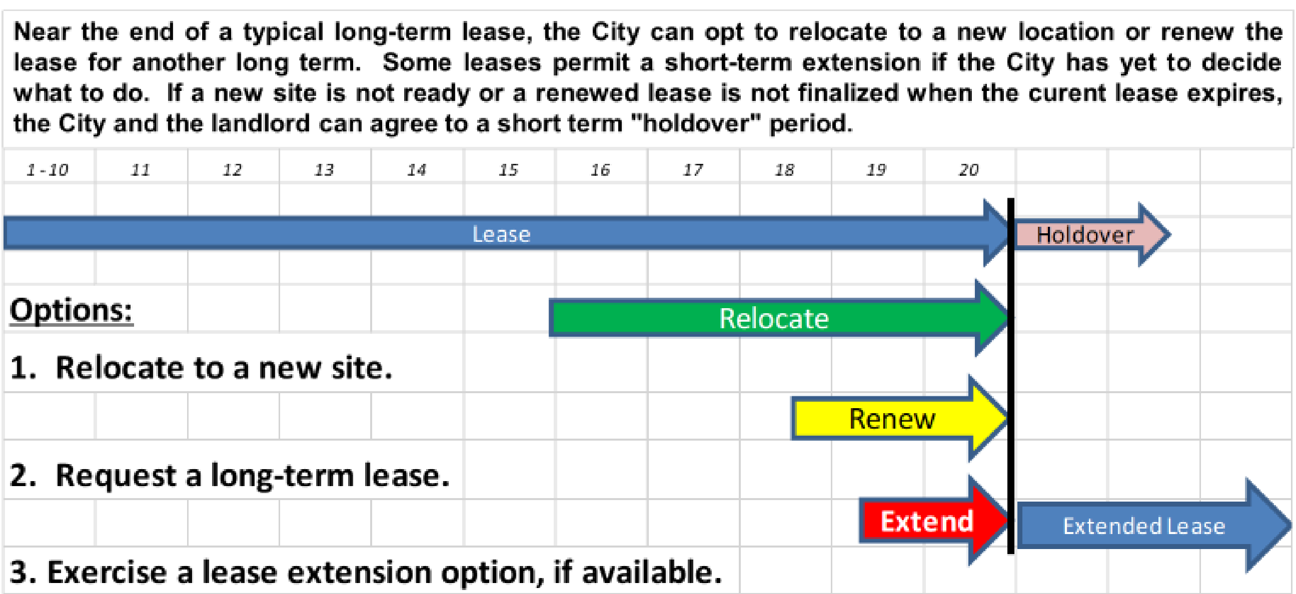


Improve Client Service: Newly Designed Spaces

Improve Client Service: Newly Designed Spaces



CHANGES IN HRA'S PHYSICAL FOOTPRINT THAT HAVE OCCURRED AS A RESULT OF LEASING DEVELOPMENTS



Recent lost leases:

- 94 Flatbush Avenue: lease expired 12/23/18: the property was razed for redevelopment. The Brownsville HRA Center temporarily moved to 275 Bergen Street, and moved again to 95 Evergreen Avenue when that new site was completed in 2019.
- 98 Flatbush Avenue: Same as above. Back-office functions were temporarily housed at other HRA sites before moving into 95 Evergreen Avenue.
- 500 DeKalb Avenue: lease expired 12/31/18, and the property was sold. The DeKalb Job Center moved to 275 Bergen Street and remains there.
- 250 Church Street: lease expired 8/26/19. Re-development is pending. GSS and IREA moved to a new site at 375 Pearl Street in 2019.

CHANGES IN THE BROOKLYN FOOTPRINT RESULTING FROM LEASING DEVELOMENTS

1. **Consolidating East New York, North Brooklyn, and Fort Green SNAP Centers at 404 Pine Street**
2. **Consolidations at 275 Bergen**
    a. DeKalb Job Center (JC) to remain at 275 Bergen Street.
    b. SNAP Personal Computer (PC) Bank to remain at 275 Bergen Street.
    c. HRA Center to remain at 275 Bergen Street.
    d. Business Process Innovation (BPI) and Public Engagement Unit (PEU) to remain at 275 Bergen Street.
    e. Community Alternative Systems Agency (CASA) from 250 Livingston Street to 275 Bergen Street.
    f. Southern Brooklyn JC from 35 4th Avenue to 275 Bergen Street.
3. **Opening of 95 Evergreen**
    a. Bushwick JC to 95 Evergreen Avenue.
    b. Williamsburg SNAP21 to 95 Evergreen Avenue.
    c. Office of Policy Procedures and Training (OPPT) to 95 Evergreen Avenue.
    d. Brownville HRA Center to 95 Evergreen Avenue.
    e. Office of Central Processing (OCP) & Centralized Indexing Unit (CIU) from 260 11th Avenue to 95 Evergreen Avenue.
    f. Income Clearance Program (ICP) from 45 Nevins Street to 95 Evergreen Avenue.
    g. Mailer and Match Action Program (MMAP) from 250 Livingston Street to 95 Evergreen Avenue.

CHANGES IN THE QUEENS FOOTPRINT RESULTING FROM LEASING DEVELOMENTS

- ➢ HRA closed 32-02 Queens Boulevard in 2017 as the result of an expiring lease and accommodated the affected programs in existing facilities located at 32-20 Northern Boulevard and 88-11 165th Street.

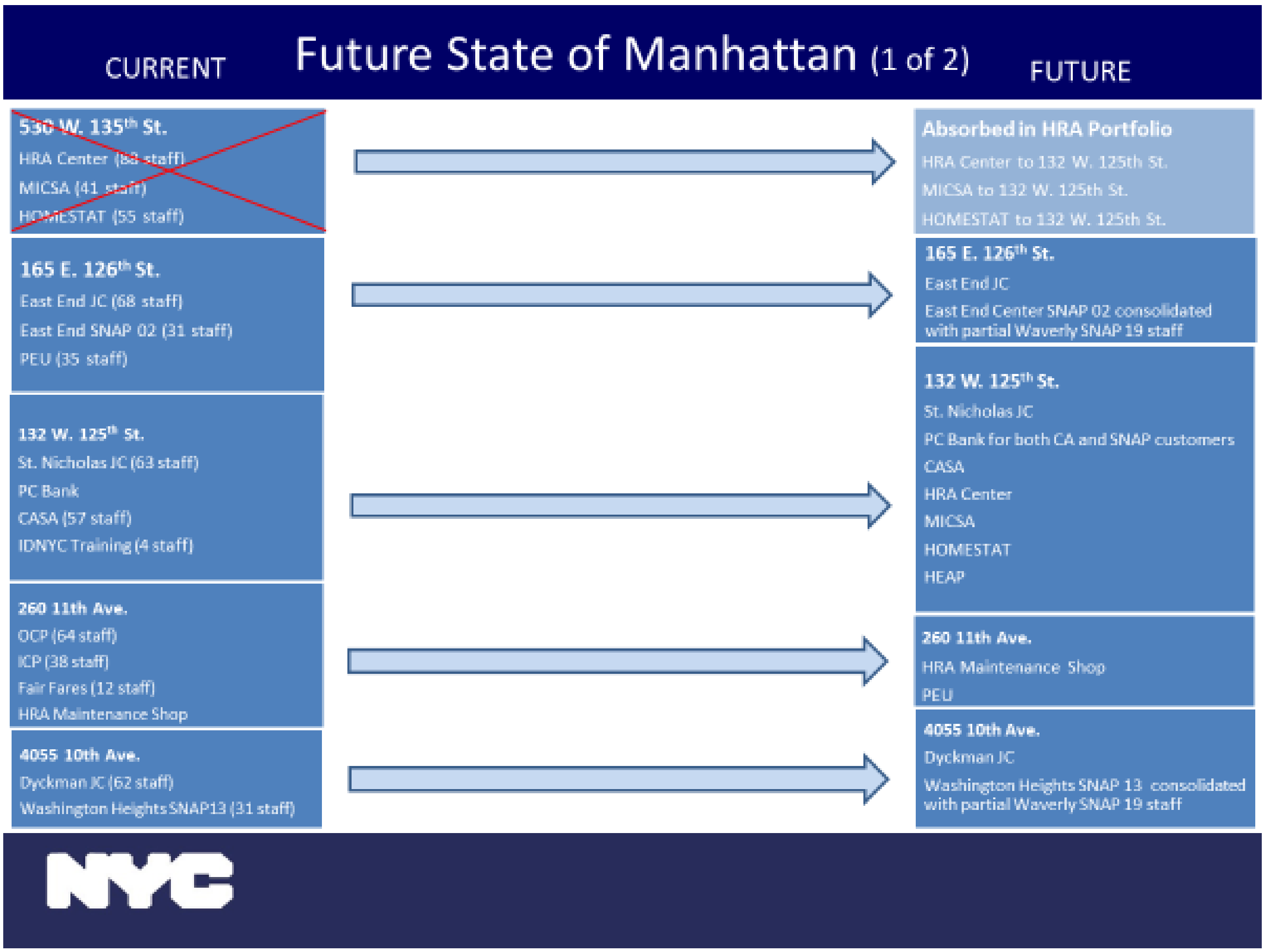
- ➢ The Queens Medicaid Center, located at 32-20 Northern Boulevard, opened an additional location in Queens at 88-11 165th Street (the Muss Building).

has changed the way HRA does business

HRA 2020: HRA MODERNIZATION

These HRA footprint changes are occurring in the context of our work to provide access to benefits to our clients without the need to come into an office, while also achieving better use of our physical footprint as a result of changes in our caseload and where our clients live, the evolving use of technology and other advances as well as opportunities to relocate to more modern office space.

THE MANHATTAN LOCATIONS

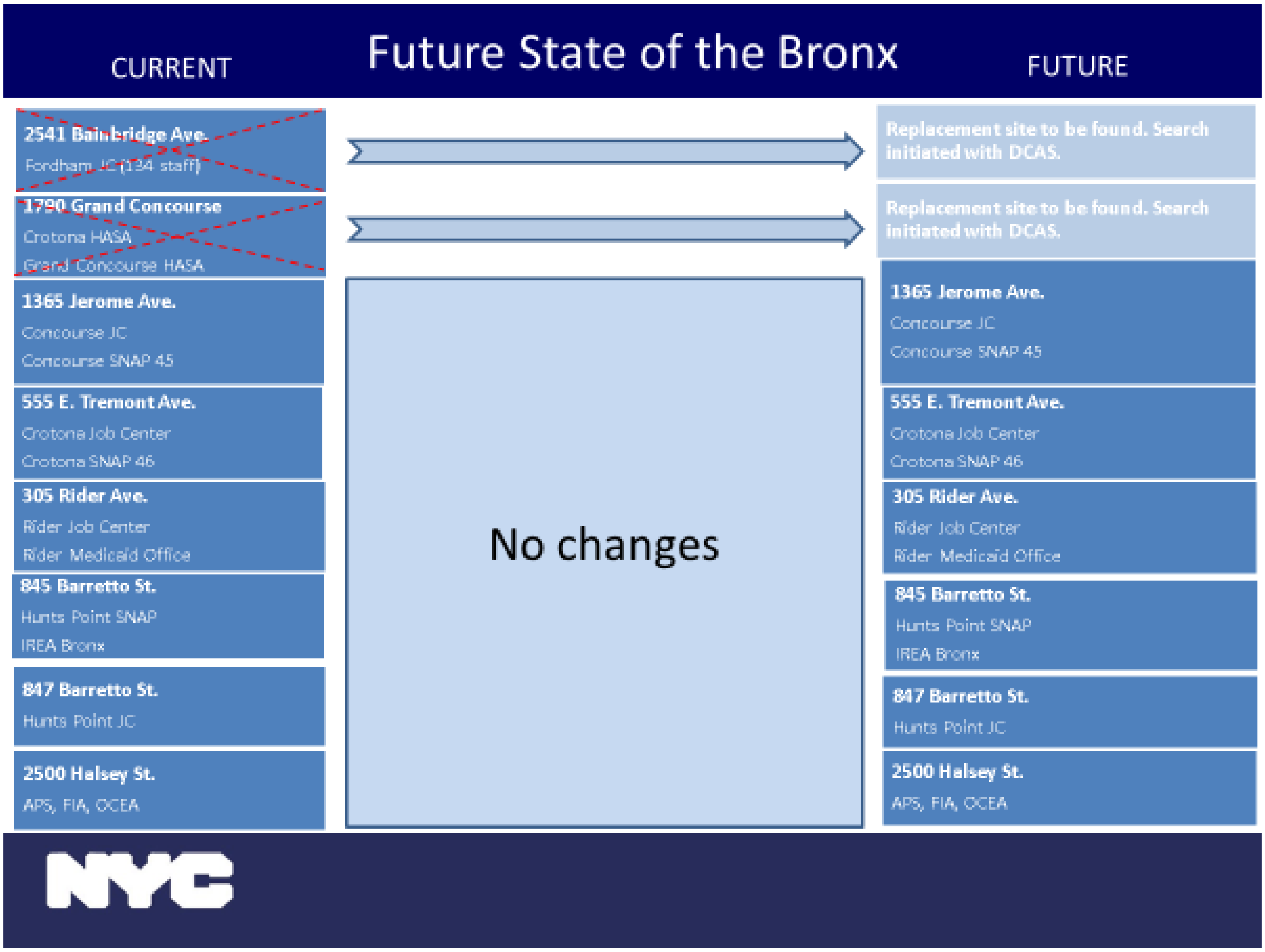


Future State of Manhattan (2 of 2)

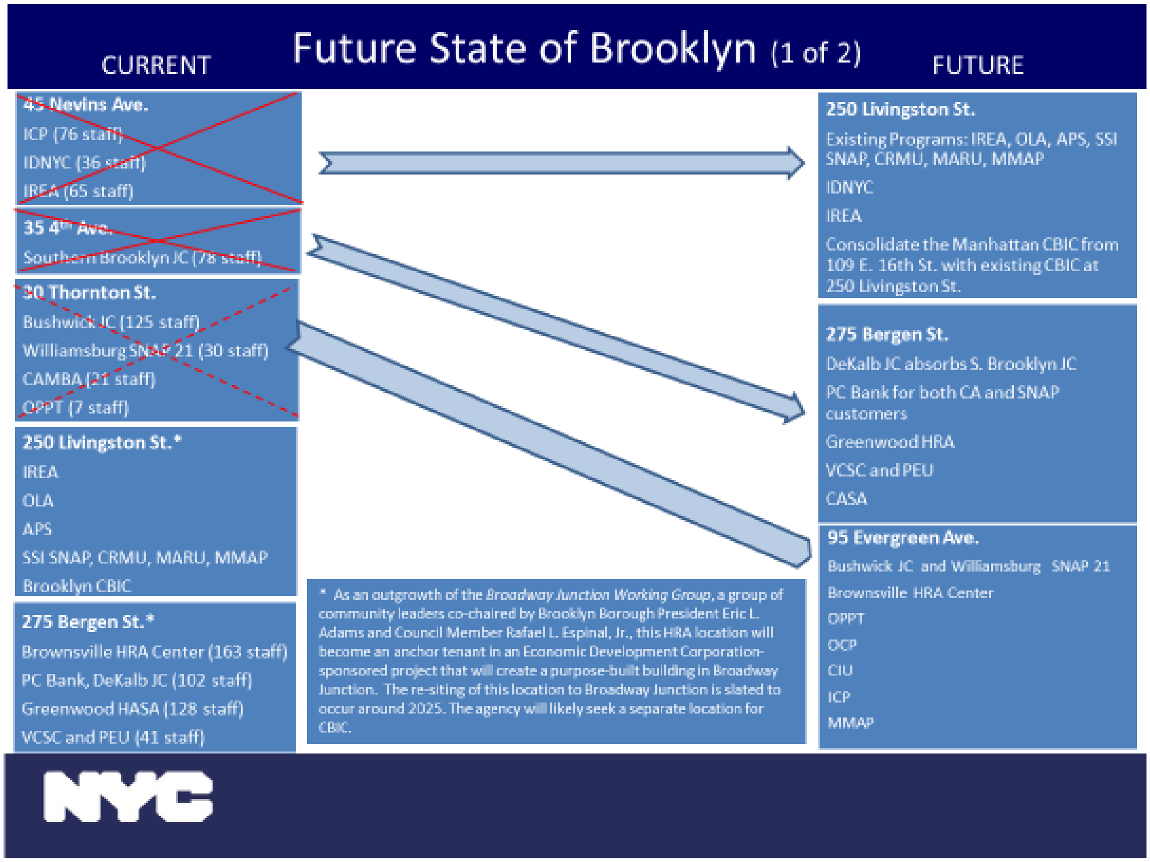
CURRENT		FUTURE
~~**8-12 W. 14th St.** FIA Waverly JC + Waverly SNAP 19 Waverly HRA Center + HASA Admin. MICSA HEAP~~	→	**Absorbed in HRA Portfolio** Waverly JC, Waverly HRA Center and Waverly MICSA to 109 E. 16th St. Waverly SNAP 19 staff to consolidate with Wash. Heights SNAP 13 at 4055 10th Ave. and E. End SNAP 02 at 165 E. 126th St. HASA Admin. to 375 Pearl St.; HEAP to 132 W. 125th St.
~~**250 Church St.** IREA, GSS, OPO, Fleet, ITS, Mail Room~~	→	**375 Pearl St.** HASA Admin. from 8-12 W. 14th St. IREA, GSS, OPO, Fleet, ITS, Mail Room remain
109 E. 16th St. Various Programs (CAS, FIA, APS, HPA, IREA, OPPT, IDNYC, Manhattan CBIC, etc.)	→	**109 E. 16th St.** Various existing Programs Waverly JC, Waverly HRA Center and MICSA PC Bank for both CA and SNAP customers IDNYC Training Ombudsman from 33 Beaver St.
400 8th Ave. Amsterdam HRA Center and APS	No changes	**400 8th Ave.** Amsterdam HRA Center and APS
115 Chrystie St. MICSA and OCSS		**115 Chrystie St.** MICSA and OCSS
4 WTC HRA Executive Headquarters		**4 WTC** HRA Executive Headquarters
151 W. Broadway IREA and OCSS		**151 W. Broadway** IREA and OCSS
123 William St. Business Link		**123 William St.** Business Link

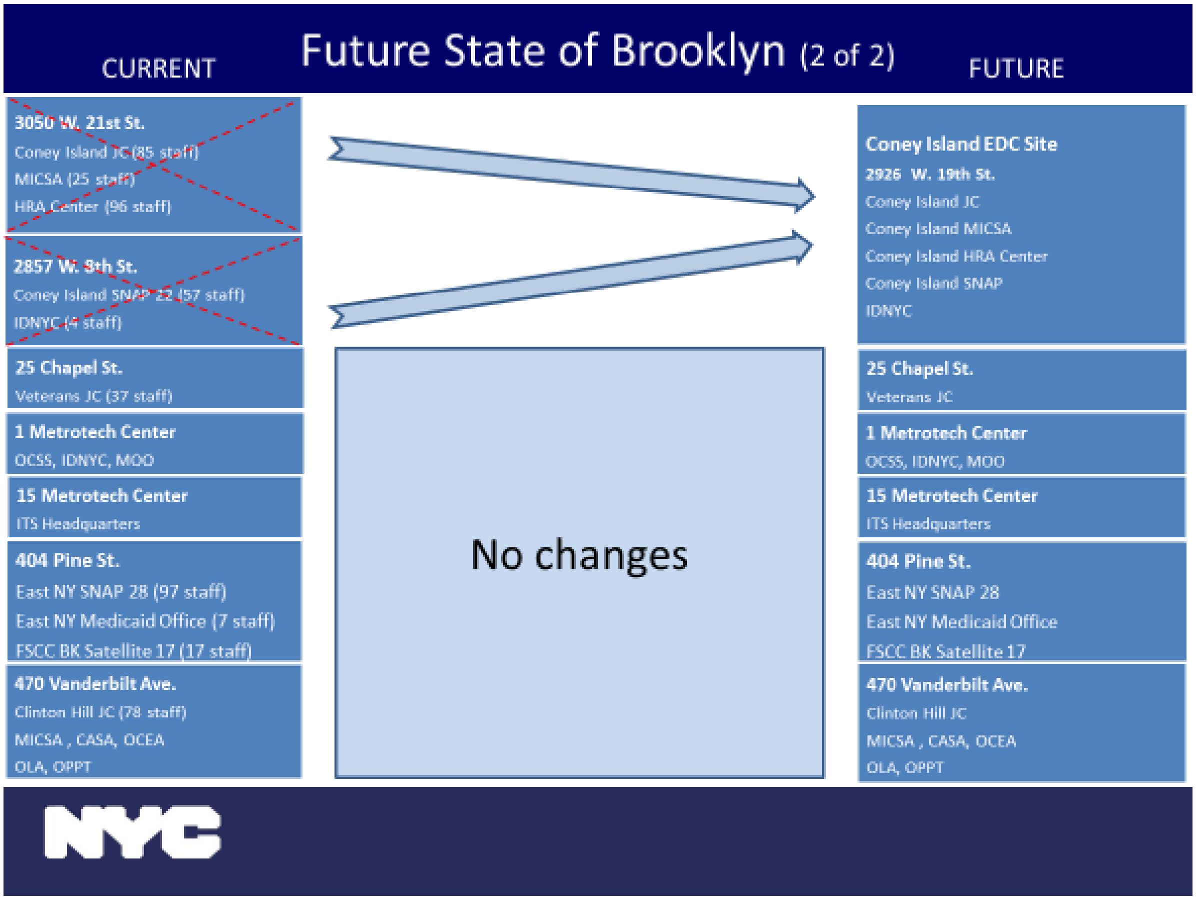
NYC Human Resources Administration
Department of Social Services

THE BRONX LOCATIONS

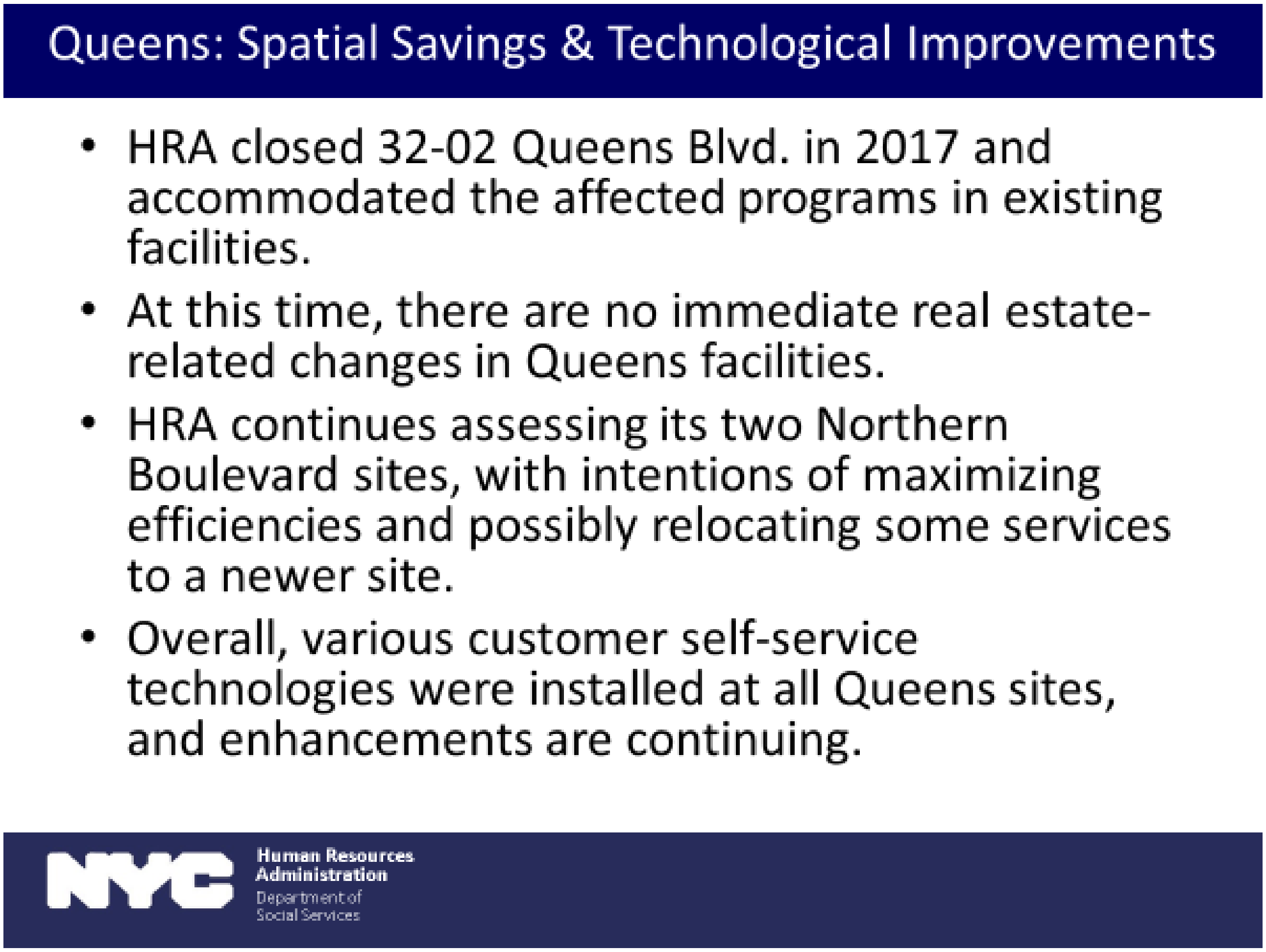


THE BROOKLYN LOCATIONS

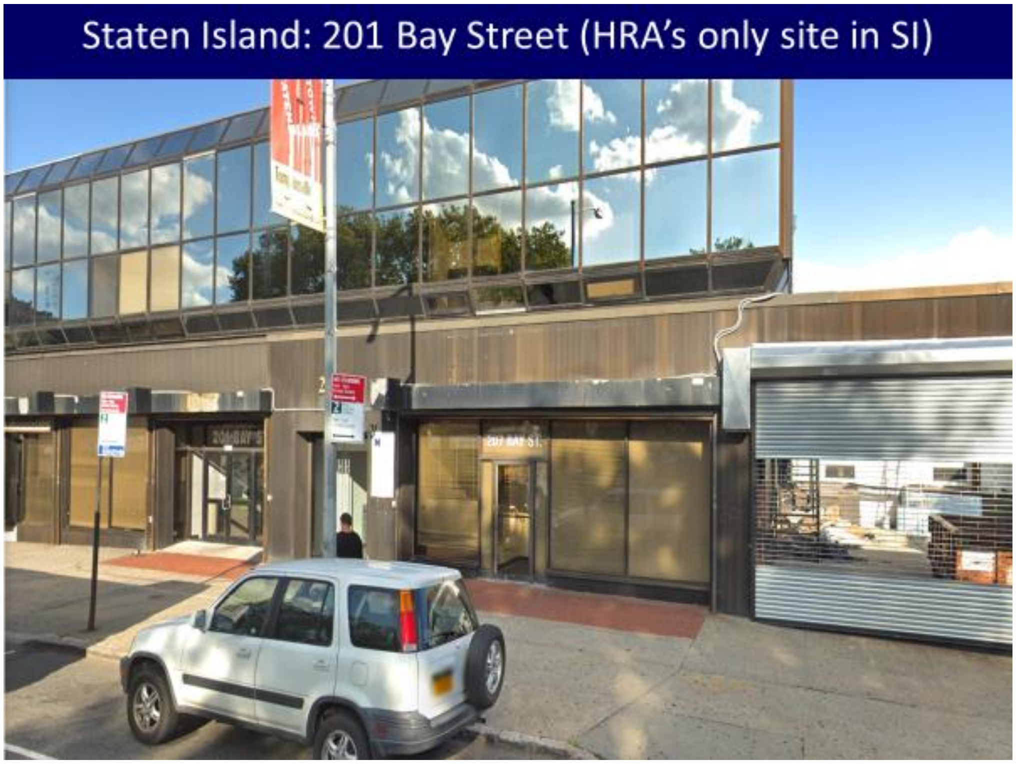


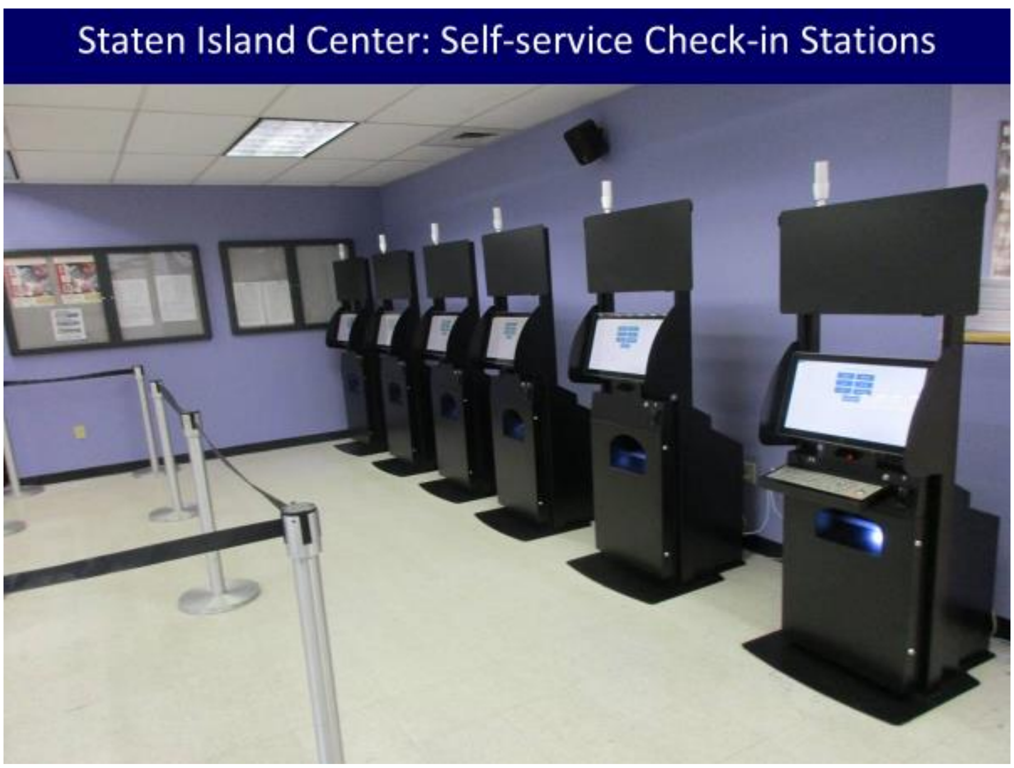

Future State of Brooklyn (2 of 2)
CURRENT
FUTURE
3050 W. 21st St.
Coney Island JC (85 staff)
MICSA (25 staff)
HRA Center (96 staff)
2857 W. 8th St.
Coney Island SNAP 22 (57 staff)
IDNYC (4 staff)
25 Chapel St.
Veterans JC (37 staff)
1 Metrotech Center
OCSS, IDNYC, MOO
15 Metrotech Center
ITS Headquarters
404 Pine St.
East NY SNAP 28 (97 staff)
East NY Medicaid Office (7 staff)
FSCC BK Satellite 17 (17 staff)
470 Vanderbilt Ave.
Clinton Hill JC (78 staff)
MICSA , CASA, OCEA
OLA, OPPT
No changes
Coney Island EDC Site
2926 W. 19th St.
Coney Island JC
Coney Island MICSA
Coney Island HRA Center
Coney Island SNAP
IDNYC
25 Chapel St.
Veterans JC
1 Metrotech Center
OCSS, IDNYC, MOO
15 Metrotech Center
ITS Headquarters
404 Pine St.
East NY SNAP 28
East NY Medicaid Office
FSCC BK Satellite 17
470 Vanderbilt Ave.
Clinton Hill JC
MICSA , CASA, OCEA
OLA, OPPT

THE QUEENS LOCATIONS



THE STATEN ISLAND PLAN





Future leasing developments:

- 34 4th Avenue (387 Dean Street): HRA is terminating its lease 5/24/20. The future use of this building is not known at this time. The Southern Brooklyn Job Center will move to nearby 275 Bergen Street.
- 530 W. 135th Street: lease expires 9/30/21. HRA will absorb its Manhattanville MICSA and Hamilton HRA Centers at HRA's nearby132 W. 125th Street facility.
- 3050 W. 21st Street: the lease will expire when the nearby new home for the Coney Island Job, SNAP, Medicaid, and HRA Centers is completed in late 2021. HRA will also terminate its lease at 2857 W. 8th Street when the new Coney Island site is completed.
- 45 Nevins Street: lease expires 2/3/22. HRA moved its back office IREA functions elsewhere and this site will temporarily house ITS consultants. Note this lease includes a non-HRA co-tenant, the Brooklyn Child Advocacy Center. DCAS is actively pursuing a lease renewal for the co-tenant that will likely expand into HRA's former space.
- 731 Flushing Avenue (30 Thornton Street): lease expires 8/31/22. HRA moved its Bushwick Job and SNAP Centers to 95 Evergreen Avenue, and the building is now temporarily housing the Fair Fares Brooklyn Center and administrative offices.
- 8-12 W. 14th Street: lease expires 1/31/23: The Waverly Job and HRA Centers will relocate to the nearby 109 E. 16th Street (Union Square) Center. The Waverly SNAP program will become a no-wrong-door Center, also at 16th Street.

- 1790 Grand Concourse: lease expires 11/30/23. The search continues for replacement sites for the Crotona and Grand Concourse HRA Centers.
- 2541 Bainbridge Avenue: the lease expires 4/3/24. The search for the Fordham Job Center's replacement site continues.
- 33-28 Northern Boulevard: lease expires 4/19/25. Two nearby potential replacement sites are being considered for the Queensboro HRA Center and IREA's Offices.
- 32-20 Northern Boulevard: lease will also expire when the nearby site is completed. Queens SNAP, Job, Medicaid, and OCSS Centers will be relocated to the new site.
- 250 Livingston Street: HRA will terminate its lease in 2025 and move its Social Security and Residential SNAP Centers, IREA's Brooklyn Field Office, Brooklyn APS, and various back office functions to a new facility to be built at Broadway Junction.

ADDITIONAL CHANGES

- 3050 West 21st Street (Coney Island Job Center, MICSA, and HRA Centers) and 2857 W. 8th Street (Coney Island SNAP Center and IDNYC) are expected to relocate to the new Coney Island EDC site at 2926 W. 19th Street in 2021.

- 1790 Grand Concourse (Crotona and Grand Concourse HRA Centers), with a lease expiring in 2024, is expected to relocate to a replacement site in the Bronx. The search for this site commenced in November 2018 and is ongoing.

- 250 Livingston Street (multiple programs, including FIA, IREA, APS, OLA, etc.) is expected to relocate to the new Broadway Junction site in 2025.

TECHNOLOGY IMPROVEMENTS IN CENTERS TODAY

- Self-service PC banks, document scanners, and/or kiosks are located at the following client centers:
  - 2857 W. 8th Street: Coney Island SNAP
  - 35 4th Ave: S. Brooklyn Job Center
  - 404 Pine St: East NY SNAP
  - 505 Clermont Ave: Clinton Hill Job Center
  - 275 Bergen St: SNAP PC bank within the DeKalb Job Center
  - 95 Evergreen Ave: Bushwick Job and Williamsburg SNAP Centers
  - 132 W. 125th St: SNAP PC bank within the St. Nicholas Job Center
  - 2322 3rd Ave: East End Job and SNAP Centers
  - 8-12 W. 14th St: Waverly SNAP
  - 219 Beach 59th St: Rockaway Job and SNAP Centers
  - 32-20 Northern Blvd: Queens Job and SNAP Centers
  - 88-11 165th St: Jamaica SNAP Center
  - 201 Bay St: Richmond Job and SNAP Centers
  - 1365 Jerome Ave: Concourse Job and SNAP Centers
  - 2541 Bainbridge Ave: Fordham Job Center
  - 555 E. Tremont Ave: Crotona Job and SNAP Centers

  - 845 Barretto Ave: Hunts Point Job and SNAP Centers

- Opening of Cash Assistance PC Banks at the following locations:
  - Rockaway JC (#79) 219 Beach 59th Street, Rockaway, NY 11692 – Online E-Applications and E-Recertifications
  - East End JC (#23) 2322 Third Ave., New York, NY 10035 – Online E-Applications and E-Recertifications
  - Dyckman JC (#35) 4055 10th Avenue, New York, NY 10034 – Online E-Applications and E-Recertifications
  - Bushwick JC (#66) 95 Evergreen, Brooklyn, NY 11206 - Online E-Applications and E-Recertifications
  - Southern Brooklyn JC (#70) 35 Fourth Avenue, Brooklyn, NY 11217 - Online E-Applications and E-Recertifications
  - Queens JC (#53) 32-20 Northern Blvd, Queens, NY 11101 - Online E-Applications and E-Recertifications
  - Concourse JC (#45) 1365 Jerome Avenue, Bronx, NY 10452 - Online E-Applications and E-Recertifications
  - Richmond JC (#99) 201 Bay St., Staten Island, NY 10301 - Online E-Applications and E-Recertifications
  - Dekalb JC (#64) 275 Bergen Street, Brooklyn, NY 11217 – Online E-Recertifications
  - Family Services Call Center (FSCC) Brooklyn Satellite (#17) 404 Pine Street, Brooklyn, NY 11208 - Online E-Recertifications
  - Crotona JC (#46) 1910 Monterey Ave, Bronx, NY 10457 - Online E-Recertifications
  - Hunts Point JC (#40) 847 Barretto St, Bronx, NY 10474 - Online E-Recertifications
  - Southern Brooklyn JC (#67) 495 Clermont Ave, Brooklyn, NY 11238
  - Jamaica JC (#54) 165-08 88th Ave, Jamaica NY 11432 - Online E-Recertifications and Online Single-Issue Grant Submissions (Utilities)

Appendix A

Undercare Workgroup

- This workgroup focuses on issues centered around clients who are receiving cash assistance benefits. We meet with advocates to discuss opportunities to facilitate client maintenance of benefits, client engagement, client re-engagement, and approaches to avoid unnecessary case actions, such as closings or sanctions, in addition to unnecessary visits to DSS offices. We have implemented many operational changes as a result of the feedback from this workgroup. One such recommendation from this group resulted in the agency providing more time for applicants to find appropriate, affordable childcare during the application process for Cash Assistance. We also developed a form for clients that provided them with confirmation of contact with their Center. This is valuable to clients as it allows them to have proof of their efforts to get services from the agency.

Supplemental Nutrition Assistance Program Workgroup

- We meet with the advocates to discuss issues experienced by clients related to their SNAP cases as well as proposed and enacted changes in law, regulation, and policy surrounding SNAP benefits. One area of focus has been improvements that could be made regarding online applications and recertifications, as well as On-Demand telephone interviews. The SNAP workgroup as well as several other workgroups have allowed us to promote the use of AccessHRA for clients and advocates through a special provider portal.

Medical Insurance and Community Services Administration and Home Care Services Program Workgroup

- We meet with the advocates to discuss issues experienced by clients related to Medicaid and Home Care cases. In this workgroup, we are currently working with the advocates to improve the provision of reasonable accommodations to clients in need. We also work with them to identify issues to take up with the State Department of Health for possible change in policy or process.

Adult Protective Services (APS) Workgroup

- We meet with advocates and providers to create a collaborative forum to share updates to program services, as well as take feedback and questions from attendees.

Office of Domestic Violence (ODV) Workgroup

- We meet with advocates to discuss concerns specific to those who are survivors of Domestic Violence / Intimate Partner Violence such as the impact and effect of current and proposed agency policies and procedures, as well as general case issues that are experienced by DV/IPV clients. Discussion of specific case examples has allowed for a means by which to change policies and practices for all clients.

HIV/AIDS Services Administration (HASA) Workgroup

- We meet with advocates to discuss updates to policy and program processes that have direct implications on HASA applicants/participants. We also provide time for an open question and answer period with attendees. There is a significant client presence at these meetings during which they share current experiences with accessing benefits and services from the agency.

Housing and Homelessness Prevention Workgroup

- We meet with advocates and providers to keep them abreast of programmatic updates touching on Housing and Homelessness Prevention initiatives. This is a forum where we provide advocates with updates and training on our newly streamlined rental assistance programs. We developed a better communication protocol between the advocates and operations in order to resolve benefit issues for clients facing eviction. We have also used the meetings to inform the community and advocates about our newly created Source of Income Discrimination Unit.

Child Care in Lieu of Cash Assistance (CILOCA) Workgroup

- We meet with advocates who represent clients who receive Child Care in Lieu of Cash Assistance (CILCOA). We review policy concerns and specific cases brought to our attention and work to improve programmatic administration of this benefit. In opening dialogue on the issues experienced by the advocates' clients, we have worked to improve client service and relations between staff and clients as well as resolve litigation issues. This workgroup has been instrumental in getting clarification and guidance on State policies surrounding this benefit. We have also been able to work jointly with the Administration for Children's Services to address the issues raised during this workgroup.

Fair Hearings and Resolution Processes Workgroup

- We meet with advocates to discuss the fair hearing operation and process and the resolution of case issues pre- and post-hearing. Some of the topics of discussion have included: the Fair Hearing Chargeback, the development of the Same Day Resolution Conference process, the creation and implementation of the Advocate Inquiry mailbox and SNAP compliance mailbox, the revision of agency fair hearing-related forms, and the process surrounding evidence packet requests. In this workgroup, we hear about how clients are treated by our Fair Hearing staff as well as the State Administrative Law Judges. With the assistance of this group we developed a new program called the Same Day Resolution Conferencing Model. This new process allows the agency to offer same day case resolutions of issues for a sub-set of cases that have requested a Fair Hearing. This process reduces the amount of time that a client spends waiting for their hearing to be called and allows for a faster resolution of a case without having to have a hearing. This pilot has been well received based on feedback from clients, advocates, and our staff. We plan on expanding this process to include other types of cases.

Lesbian Gay Bi-Sexual Transgender Questioning and Intersex (LGBTQI) Workgroup

- We meet with advocates to provide updates to LGBTQI programming and create an opportunity to provide a question and answer forum for feedback and input. This workgroup has current and former clients and community members in attendance. In the open discussion segment, we hear from clients about their experiences at centers and with staff. Client and advocate feedback from these meetings has helped to develop the curriculum for staff LGBTQI training. Additionally, we have heard clients of trans-experiences speak about their client service concerns. From these conversations, the LGBTQI policy was developed, which includes guidance on how to properly pronoun a client.

Language Access Workgroup

- We meet with advocates to discuss language access issues that clients encounter. Based on conversations with the advocates, we learn about program areas and Job Center locations where clients face language access barriers. If specific staff or centers have been brought to our attention, we work to provide refresher Language Access and Cultural Competency training for those locations. If the language access issue involves signage, we work with the Office of Communications and Marketing and DSS offices to address the need for additional or improved signage. In instances where language access involves client documents, we work with the appropriate program area to review, and where necessary, have conversations with our State oversight agency about any proposed changes.

Immigrant Access Workgroup

- We meet with advocates to discuss issues specific to clients with differing immigration statuses and the impact that these non-resident statuses have on a client's ability to access benefits and services. There are two Immigrant Access sub-groups: one focused on CA and SNAP topics, and one focused on Medicaid-related topics. Based on feedback received by advocates about client treatment by staff, we issued Policy Bulletins to staff to clarify agency policy positions. From these workgroups, a desk guide for front line staff was also developed. The curriculum development for trainings on Immigrant Access for staff has been largely informed based on issues and conversations in this workgroup.

Urban Justice Safety Net Activists – HRA and DHS -- Workgroup

- We meet with the Urban Justice Safety Net Activists in two separate workgroups: one devoted to HRA topics and one devoted to DHS topics. Many of the UJC activists are current or former HRA and/or DHS clients. The activists raise issues of concern at these meetings related to client experience at the Job Centers (HRA) and Shelters (DHS).
  The attendees in these two workgroups provide us with a unique vehicle for feedback on client experience. We use these workgroups to take in complaints and policy suggestions, while also providing agency updates that are relevant to the attendees. For example, we have worked with this group to get feedback regarding the development of AccessHRA, while continuing to provide presentations on additional updates to AccessHRA.

Columbia Justice Workgroup

- This is a new workgroup that is comprised of formerly incarcerated people who are also part of the Center for Justice at Columbia University. The goal of this workgroup is to discuss ways to better connect formerly incarcerated and soon to be released people with public benefits.