CalSAWS Migration
Interest Areas and Planning Priorities

MEMO

To: Todd Bland, CDSS
         Rocky Givon, CDSS
         Frank Mecca, CWDA
         Christiana Smith, CWDA

CC: John Boule, CalACES
         Rene Mollow, DHCS
         Sandy Williams, DHCS
         Yingjia Huang, DHCS

From: Jennifer Tracy, Cori Racela, and Diana Jensen on behalf of SAWS Migration advocacy
         organizations listed below:
         Alliance to Transform CalFresh
         California Association of Food Banks
         California Family Resources Association
         California Food Policy Advocates
         Catholic Charities of California
         Children Now
         Health Consumer Center & Neighborhood Legal Services
         Los Angeles Regional Food Bank
         National Health Law Program
         SF-Marin Food Bank
         Western Center on Law and Poverty

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Our coalition, comprised of anti-hunger, health, and youth rights advocates, seeks to join state and county agencies to promote transparency and consumer protections as the county welfare eligibility systems merge. All of our groups have worked with agency partners to review, test, and provide feedback on new or evolving benefits administration technologies and we want to be sure that lessons learned from prior migrations are incorporated into the CalACES and CalSAWS development and rollout.

We request engagement beyond the scope of the portal to include the variety of aspects that have a direct impact on client benefit retention, access to services, client experience, and the overall understanding of how the system functions to ensure client needs are being met. We are stakeholders with a wealth of experience and a history of partnering with state and county administrators to meet our shared goals of ensuring technology and business processes can be effective and efficient in ensuring excellence in access to necessary resources for low-income Californians.

We envision that stakeholder input and involvement will concentrate on four main areas: accountability and oversight, technology integration, strong data management framework, and impacts of the migration roll-out on consumers. We understand that CalACES and CalSAWS will be developed based on the current LRS system, and we'd like to be adaptive to that process, i.e., we do not intend to request major reprograming changes or a revisitation of decisions about the CalACES structure. We intend to better prioritize our areas of focus once we have a better sense of the status of the planning process and decision making.

Along the same vein, we are interested in seeing oversight structures developed and implemented as part of the overall system. This is not a request for direct advocate oversight, but instead a commitment to increasing transparency between the state and counties to a reasonable level as a way to better understand performance and promising practices in administering benefit programs.

In the following pages we have highlighted key areas where we believe that careful planning will be necessary in order to ensure a high quality consumer experience from migration to implementation and beyond. There may be other areas that emerge as our understanding evolves on the ways the system will impact client experiences.

We hope that the topics we've listed are already included in the plans for the SAWS development and migration; our future conversations and engagement would be focused on clarifying how, when, and by whom that planning might occur, and identifying the most useful ways for consumer advocates to support that planning to achieve the best results.

We look forward to the opportunities to engage on these topics to learn more, share insights, and work together to envision, develop, and implementation an eligibility IT system that can best meet the needs of stakeholders in California.

Sincerely,

Jennifer Tracy
Consultant
Alliance to Transform CalFresh
Jennifer@jenntracy.com
503-890-0556

Cori Racela
Senior Attorney
Western Center on Law and Poverty
cracela@wclp.org
213-235-2637

Diana Jensen
Senior Policy & Advocacy Analyst
San Francisco-Marin Food Bank
djensen@sfmfoodbank.org
415-282-1907 x313

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A. PLANS FOR MIGRATION, SYSTEMS ROLL-OUT, AND ONGOING DEVELOPMENT.
Comprehensive planning for migration, system roll-out, and ongoing enhancements are critical to minimize the adverse impact of unforeseen transition challenges on consumers and workers alike, and for moving toward excellence in the future.

1. Quality Assurance with Robust Testing for Initial Migration and Ongoing Development

   a. Quality assurance plans to ensure that processes work as designed (e.g. review of policy programming, notices, benefit issuance, etc. by relevant state agency experts and end users), instead of waiting for consumers and their advocates to bring them to attention.
   b. Measures in place to address defects before roll-out continues; ability to delay roll out if major defects are not corrected.
   c. User testing by all relevant users before roll-out and as a part of phased roll-out process.
   d. User-centered approach to continuous improvement: The processes for developing ongoing improvements to the system should embrace user-centered design principles, involving clients and county workers in user testing and design processes. (See Appendix I)

2. Mitigate the Impact of Programming Errors

   a. Plans for phased roll-out to prevent mass errors.
   b. Maintaining access to benefits: During periods of transition, measures to "pend" or maintain eligibility will help to ensure that migration errors do not negatively impact consumers.

3. County Support and Training

   a. Review of compatibility of new technology with county business processes before release, and plans to provide assistance to make adjustments as needed.
   b. Robust and *ongoing* user/worker training, including pre-implementation training and post-implementation trainings and materials for ongoing education.

Client Impact: Transition between systems has historically been a particularly difficult period for vulnerable aid recipients as unknown defects undermine access to necessary benefits. Because of the direct impact of transition periods to client access to benefits, advocates encourage the migration team to prioritize efforts to ensure a transition with minimal negative impact to client benefits, enrollment, and data. Enable counties and eligibility workers to effectively utilize the tool over time for ongoing high quality customer service.

Reason for Concern: Even the carefully phased-in launch of LRS revealed gaps in noticing programming, automatic eligibility protections, and beneficiary appointment setting. Our recommendations are designed to identify similar inevitable enhancement needs earlier rather than later to minimize any beneficiary harms. Previously, CalWIN launched with a successful conversion rate from CDS of 22% resulting in hundreds of thousands of cases that had to be reviewed and corrected manually. After launch the defect list quickly grew to over 4,000 and took several years to work down.

B. REQUIREMENTS THAT ENSURE A STRONG DATA MANAGEMENT FRAMEWORK

Centralization of data warehouses with clear governance and quality assurance underpins the long term ability of California stakeholders to understand and improve performance in relation to social services programs and administration.

1. Consolidation of databases, training, and simulation environments

   a. Plans for county flexibility are underpinned by a principle of consistent fundamental design and functionality to ensure efficient training, QA, and maintenance

2. Data governance, quality standards, and data dictionary with clear oversight structure that ensure that it is possible to measure program performance reliably.

   a. Clear oversight structure with the goal to measure program performance reliably
   b. Consistent data dictionary implemented across counties, including clear references to definitions and/or calculation detail

3. Data warehousing structure that facilitates open connections to business intelligence products, creating the opportunity to analyze issues on an ad hoc basis.

   a. Views or tables facilitate analysis of policy implementation, overall program access, and process performance
   b. Data warehousing anticipates diverse & evolving BI software

4. Capacity for robust and flexible reporting that can support program management, evaluation of program access, and implementation of policy across diverse communities.

   a. Allow for ad hoc analysis of key areas in a timely way, at state and local levels
   b. Reporting supports program management, evaluation of program access, and implementation of policy across diverse communities
   c. Data sharing agreements that allow for analysis, as needed
   d. Report development process includes key subject matter experts

Client Impact: Data is the window through which we can understand if, when, how, and who (demographically) is getting the benefits needed to be healthy and whole in California. Data availability and reliability directly impact stakeholder understanding of access, tells us if and how interventions are performing, and can act as bell weather for trends signaling systemic barriers that need to be addressed.

Reason for Concern: Differences in data definitions, data entry protocols, and report queries across counties or consortia result in summary reports that often cannot be reliably benchmarked. Current reporting does not easily allow for analysis of disparate outcomes across key program populations or demographics. An overwhelming number of data tables and/or weak documentation makes it difficult for county analysts to create reports with confidence.

C. CAPACITY TO INTEGRATE WITH EXISTING AND FUTURE TECHNOLOGIES
As technology evolves, governments need to be able to keep up with opportunities to implement efficient, cost effective, and even cutting edge products that can further the goals of excellence in program administration and service delivery.

1. Integration with other statewide and federal systems (CalHEERS, MEDS, verification hubs, etc.).

    a. Ensure that CalSAWS integrates seamlessly with external statewide and federal systems (e.g. CalHEERS, MEDS, verification hubs, etc.), and is poised to maintain integration as external systems evolve.

2. Software that supports business operations (document imaging, task management, lobby management, call centers, hearings, overissuance collection, consumer outreach, etc.).

    a. Allow for flexibility, potentially by considering modular development, open APIs, and flexible contracting

3. Integration with application portals and relationship to legacy consortia application portals.

    a. Ensure that web portal fields all communicate to SAWS/back end
    b. Support the integration of application portals (statewide CalFresh application portal, GetCalFresh.org; CoveredCA.com, etc.) and maintain relationship to legacy consortia application portals (e.g. MyBCW, C4Yourself, and YourBenefitsNow).

Client Impact: Business operations directly impact a client's experiences in an office, on the phone, and in other communications. Advocates have an interest in understanding the ways that California plans to develop a system that can evolve with the needs of the communities being served and the technologies that communities are familiar with.

Reason for Concern: Inability to link SAWS with MEDS can result in Medi-Cal beneficiaries losing benefits without notice. Because Medi-Cal providers use MEDS to verify eligibility at the point of service (doctor's office or pharmacy) it is crucial that MEDS and SAWS are aligned to prevent access to care issues.

D. TRANSPARENCY AND ACCOUNTABILITY STANDARDS AND STRUCTURES

Establishing lines of responsibility along with the ability to ensure standards are being met is critical as the CalSAWS system is being developed and implemented. Increasing transparency and accountability allows the state, counties, advocates, and the public to better understand what is working well and where resources can best be invested for long-term improvements.

1. Overall System Performance Standards

    a. General data quality standards, including defining terms and quality assurance of county data
    b. Capacity to collect information on user experience and barriers to ease of use
    c. Protections for consumer rights and access to information
    d. Standards for system accessibility in terms of "up times," languages, and ADA requirements
    e. Regular reporting of system defects and interim workarounds to minimize consumer impact

2. Implementation of new policies, processes, protocols, forms/letters/notices, etc.

    a. Review and identify priorities of implementation plans and system updates
    b. Training plans (including both technology and business process TA)
    c. Timeliness of implementation (including testing)
    d. Evaluation of successful implementation
    e. Ongoing quality assurance of system functionality by third-party vendor, including risk analysis and monitoring progress

3. Roles of CDSS, DHCS, OSI, CWDA, and consumer advocates in meaningfully overseeing and prioritizing the work of the SAWS.

    a. Clear indications of responsibility and accountability for successful implementation of eligibility and case management functionality and consumer protections at rollout, stabilization, and beyond.
    b. Quarterly meetings to include regular updates on the upcoming work to analyze, prioritize, and implement corrections to defects and proposed enhancements.
    c. Mechanism to escalate and resolve operational problems that are having immediate consumer impact
    d. Structure for soliciting, reviewing, and incorporating consumer feedback
    e. Capacity of local and state entities to access and leverage data to evaluate effectiveness of policy implementation, and identify opportunities for business process and/or policy improvements.

Client Impact: Clients are directly impacted by new policies, implementation processes, and system performance. They also see a direct impact when standards are in place and key departments and individuals are in place to meaningful oversee the work that causes policies and processes to function. Advocates have an invested role in understanding how the eligibility system is intended to work in order to identify and convey issues that arise for CalFresh consumers.

Reason for Concern: Consumers who lose CalFresh benefits or have to submit verifications multiple times because certain verification screens are only available to supervisors and not to eligibility workers, such as what has happened in LRS.

APPENDIX I: USER CENTERED DESIGN

Since there are many aspects of User Centered Design (UCD) including the types of users and stages where user feedback may be sought and analyzed, advocate stakeholders want to highlight the importance of engaging client, applicant assister, and advocate users in the development process to ensure that not only the obvious aspects of the design (e.g., the portal) meet their needs, but that other key functions meet these user needs as well.

As noted in the previous pages of this document, there are a number of features of the CalACES and CalSAWS designs that directly impact client, application assister, and advocate stakeholders even if they are considered "back end." UCD is also crucial for county eligibility and case management staff. How county staff engages with CalACES/CalSAWS technology should incorporate core UCD concepts such as accessibility, usability and logical information architecture. The accuracy of program eligibility results and effective case management depends county workers having a system they understand, can navigate easily, and that minimizes confusion and errors.

We strongly encourage decision makers to consider the ways that a diversity of users may be impacted be all aspects of the design – be they front-facing or back end – and develop opportunities for feedback early enough in the processes for the feedback to be useful.

Moreover, we encourage decision makers to develop a user-centered culture that focuses on ensuring usability that benefits low-income people and ensures programmatic goals can be met. UCD is, therefore, different than User Acceptance Testing (UAT), which confirms if a deliverable meets the outlined requirements. Integrating User-centered culture and UCD as part of the design process is important for transparency and saving money in the long run.

According to Usability.gov, a clearinghouse of information about UCD: "Creating a user-centered culture means that government agencies hold themselves to a higher standard by making sure that users can access, understand, and use the information provided. It also means that users can accomplish their tasks, give input, and know that their feedback is taken into consideration and acted upon.

"By embracing the user experience (UX) best practices and the user-centered design process, agencies save money long-term and increase their credibility by being more transparent. Through a user-centric approach, agencies among other things can:
- Identify and respond to user needs through conducting user research while still meeting organizational goals.
- Produce information that is easily understood and acted upon.
- Create systems that better facilitate transactions, internally and externally.
- Deliver information so that it can be accessed anywhere and through various channels and technologies.
- Encourage participation by making it easy to connect with people.
- Increase productivity and efficiency with usable systems.
- Improve based upon feedback and analysis of other performance measurements."

User experience, especially client users, should not be an afterthought. It should be incorporated early, before findings are too late to implement or costly to address; and it should be incorporated widely, not limited to "front-facing" aspects of the system. We encourage CalACES and CalSAWS decision makers to explore recommendations on UCD here: https://www.usability.gov