



November 21, 2005

Eric Bost, Under Secretary
Food and Nutrition Service
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250-0002

Dear Under Secretary Bost,

Last week, members of the Texas Senior Advocacy Coalition met with Bill Ludwig and Judy Barron in your southwest regional office to share with them our concerns with the Texas Integrated Eligibility and Enrollment Services (TIEES) project and our recommendations for performance measures that should be used and data that should be collected to test the new system as it is rolled out.

The Texas Senior Advocacy Coalition is a non-profit organization that advocates for senior issues and has 39 non-profit voting members throughout the State of Texas. Our membership voted to send this letter at its monthly meeting on November 14, 2005, and three of our non-profit members, Older Women's League, Telecom Pioneers, and National Committee to Preserve Social Security and Medicare, wanted to join in this letter by name.

The Texas Senior Advocacy Coalition has serious concerns about the impact of the TIEES project on access to food stamps for seniors. In particular, we fear that the decrease in face-to-face assistance and the increased reliance on phone and Internet channels, combined with the closure of one-third of local offices, will make it harder for seniors to access food assistance. We also worry that the decrease in face-to-face assistance from the state and its contractor will strain the resources of the nonprofit and faith-based organizations that provide services to Texas' seniors.

We know that USDA shares many of these concerns and is working with Texas to design a phased-in rollout that will test the new system's ability to serve vulnerable populations, including seniors, as well as realize the general goals of improving access to nutrition assistance and increasing program participation.

Based on our meeting with Mr. Ludwig and Ms. Barron, it is our understanding that USDA's approval of Texas' project (conveyed in Mr. Ludwig's November 7, 2005, letter to the Texas Health and Human Services Commission) is limited to three months of funding for the initial roll-out phase, and that funding from USDA for Texas to move beyond the first phase is conditioned on the state achieving certain milestones and meeting specific performance measures. Mr. Ludwig also indicated a willingness on behalf of USDA to consider the input of advocates in Texas in developing these measures and assured us that USDA's Office of Civil Rights would be involved in the decision making process as well.

With this commitment in mind, we offer the following recommendations to assist USDA in determining whether the alternative approach to delivering Food Stamp benefits proposed by Texas is capable of meeting the needs of one of our most vulnerable populations, seniors.

1. USDA should require Texas to develop a plan that documents and specifies in detail how the state will ensure that seniors are able to obtain and retain benefits through every facet of the TIEES project. This plan should specify:
 - Whose responsibility it will be to assist seniors who need assistance with the benefits application process, including individuals who, for disability or other reasons, cannot travel to community-based organizations, libraries, and other sites that will serve as access channels for those wishing to apply for benefits.
 - How seniors will be screened (both applicants and recipients) to determine whether they qualify for the medical expense deduction, uncapped shelter expenses, or to be certified as a separate household with a higher income limit.
 - How this screening process will occur and include a protocol describing how and when information obtained from this screening will be shared with state agency (BIC) staff so the state can follow up on it during the face-to-face interview.
 - How state and its contractor (subcontractor) staff will be trained on the Food Stamp Act as it relates specifically to seniors, and how the state will monitor its own compliance, and that of subcontractors, with these policies in every facet of the TIEES project;
 - How the state and its contractor will inform the public about all of the access channels so that seniors who cannot use one point of access will be aware of alternative points of access. At a minimum, this outreach campaign should include radio and television announcements, posters, outreach to service providers (such as hospitals, meals on wheels providers, senior centers), community-based organizations, and other organizations that provide services to seniors.
2. USDA should require Texas to monitor call center/Internet access for seniors. This could be done by collecting data on the number of seniors who access the system through the call center/Internet and documenting the difficulties they incur.
3. For seniors unable to initiate and/or complete an application through the call centers/Internet, USDA should require documentation on the number of requests for home visits from seniors who are unable to travel to and attend appointments at local offices, the number of such requests that are granted, and the average length of time lapsed between the request and the visit.
4. To the extent possible, USDA should require the state to provide data comparable to those collected during the roll-out for a pre-project baseline period (for example, previous five years) to enable it to examine the experience serving seniors under both the current system and the new system.
5. USDA should require the state to survey community-based organizations (including CBOs specifically enlisted to help individuals apply for food stamps and other service providers that work with seniors) to assess their experience with serving seniors seeking food stamps and to identify any problems they have with accessing food stamps. (Survey or data collection should begin when the first phase begins or shortly thereafter, so contemporaneous data is collected. A survey done after the fact may not reveal more than unsupported impressions.)
6. The state should report all of the above to USDA.

In addition, given the new expectations and demands the new service model will place on the nonprofit and faith-based communities, we urge USDA to require Texas to evaluate these new partnerships and the capacity of community-based organizations to fulfill any new obligations imposed on them. In addition to quantifying the availability, willingness, and capacity of CBOs in different areas of the state to participate in the new system, USDA should require Texas to quantify the cost to CBOs (including those specifically enlisted to help individuals apply for Food Stamps as well as the CBO community, in general) of their involvement in the new system.

Whatever measures or milestones USDA ultimately uses to evaluate TIEES, we urge you to use them not only during the initial phase of TIEES, but in every subsequent roll-out phase approved by USDA. It will be difficult to fully test all of the various components of the new system and identify all potential deficiencies or flaws in the first three months. Because the initial roll-out is limited to the five offices that serve Travis and Hays Counties—largely urban or suburban areas that serve less than 3% of the Food Stamp caseload—it will be impossible for USDA to verify that the new system is capable of serving Texas’ geographically and ethnically diverse population. For example, problems that arise for seniors in these areas will be very different than those that occur in rural areas, where travel to the nearest office or CBO may be longer, and therefore the need for home visits more likely.

Unlike other states, Texas does not permit state court judicial review of final administrative decisions regarding eligibility for food stamps. The lack of that accountability tool makes “up front” accuracy and timeliness all the more important in an environment that would emphasize increased use of “distance” case processing.

We recognize the difficulty of measuring and evaluating access for specific populations, for whom little baseline data may exist. We hope this is an area where we may be of assistance, as we will be closely monitoring the challenges encountered by seniors as this project is rolled-out. During our meeting with your regional office staff, Mr. Ludwig agreed to meet regularly with advocates both during the initial roll-out and before USDA approves funding for Texas to move beyond the first phase. These meeting should give us an ongoing opportunity to share with USDA our impressions and the experiences of our clients with TIEES.

We would appreciate a response that details the steps USDA will take to measure access for seniors during the TIEES roll-out. Please call on us should you have any questions regarding our concerns and recommendations.

Sincerely,

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Joined by
Older Women’s League;
Telecom Pioneers; and
National Committee to Preserve Social Security and Medicare

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