



December 13, 2007

By email to HHS.Communications@hsc.state.tx.us.

To whom it may concern:

Thank you for the opportunity to submit the following comments on the Health and Human Services Commission's efforts to revise and redesign the benefit application forms. These comments relate exclusively to Forms H1010 A/B and H1010-E.

General

- The Spanish and English versions should be separate forms in order to create more space and shorten the length of each.
- A very long application can be overwhelming. However, at the same time, an application without enough explanation, too small font, or that is overly cluttered will only lead to confusion and error. We believe that 8-12 pages is an appropriate length to shoot for in an integrated (multi-program) application.
- We support the goal of an integrated application, but are concerned that the H1010-E tries to do too much and as a result is cumbersome and confusing for applicants and the CBOs that assist them. In contrast, the 1010A & B formats, whatever their flaws, appeared considerably more user-friendly and less intimidating. We recognize how difficult it is to balance the goal of making an application user-friendly (and not too long) with the desire to collect as much information as possible and get applicants all the services available to them. As you move forward with your revisions, we urge you to extensively test the changes you make with applicants, front-line workers, and CBOs. We believe this is the best way to strike the appropriate balance between ease-of-use and thoroughness.
- Children's health advocates strongly support maintaining a separate combined application for children's Medicaid and CHIP. This makes it possible to include precise instructions on documentation required (e.g., because more complex Food Stamps requirements need not be included), with the goal that parents can submit a complete and fully documented application on the first attempt.
- We urge HHSC to view this revision process as part of an overall goal to eliminate procedural denials (denials due to incomplete information, as opposed to having affirmative knowledge of ineligibility) to the greatest degree possible. Louisiana Medicaid eligibility staff adopted this goal in recent years and were able to reduce procedural denials for children to fewer than 10% and increase renewal rates above 90%.
- In that spirit, updating and expanding the separate instruction forms that accompany applications should get as much attention as the application forms themselves. HHSC should use the instruction guides as an opportunity to depart from BOTH "legalese"-sounding language and language that uses terms known only to eligibility staff.
- We urge you to provide explanatory information about the "non-intuitive" questions you ask whenever possible. For example: if asking about domestic violence, explain that there are special accommodations that can be made for DV victims. In general the H1010-B does a better job of this than the H1010-E.
- Special attention should be devoted to adding instructions AND making application changes to better ensure that the recently-imposed citizenship documentation requirement for Medicaid is fully understood by applicants. This could also double as a way to ensure eligibility staff understand correct HHSC policy.

- Specifically, we recommend that the application include a place for the applicant to routinely request a BVS database search for Texas birth records (i.e., for Texas-born persons only). This could be added to section A of the 1010, and section 3 of the 1014.
- Another question should ask to whether the person needs assistance locating documents other than a Texas birth certificate. HHSC's contracted CBOs should be trained in how to assist applicants in obtaining out-of-state birth records, and eligibility staff should make referrals for this help without fail. (HHSC may wish to also allow other non-contracted nonprofits to be added to the referral list).
- The instructions for applicants should explain that a BVS search is available for those lacking a hard copy Texas birth certificate, and that CBO help in obtaining out of state documents is available. The instructions should also state that if the birth record has been provided in the past, it will not need to be provided again. A statement that eligibility will not be delayed for newborns delivered in Texas hospitals awaiting issuance of a birth certificate and SSN would also be helpful. Having these statements in the official instructions would have the additional benefit of eliminating any confusion among staff as to the correct policy.
- We urge you to include in a prominent place on the application the contact information for the CBOs under contract with the state to provide application assistance. This would support the goal of having applicants submit a complete application and reduce the risk of procedural denials for failure to provide necessary information.
- Neither the 1010E application nor the instructions for the 1010A/B and 1014 make it clear that reporting the make, model, and year of a vehicle is not sufficient; applicants must also provide the "style code" which can greatly affect the market value of vehicle. In fact, the 104 instructions actually say, "Depending on your family's income, we may need to ask you for more information about your vehicles," which automatically introduces the potential for processing delays. As a result, large numbers of missing information requests are sent back to persons applying or renewing coverage. Unless this policy has changed (i.e., unless the style code is no longer needed to establish the lower value), then this information should be clear on BOTH the application and the instructions.
- Renewal forms should be as short as possible and not ask the client to provide all of the same information that they provided during the application process. They should only ask the client to provide information that has changed.

Immigration, Social Security Numbers, and Household Information

Currently, the Household Information section of the H1010-B informs the applicant that failure to provide an SSN will disqualify the person from receiving benefits, but it does not make clear that 1) if the applicant needs help applying for one, HHSC will help, or 2) if the person is not applying for benefits for him/herself that an SSN is not needed. The H1010-E is silent on the subject of SSNs in the section where the applicant is asked to provide them.

- We recommend that the information about immigration and SSNs (currently in Part A of the H1010 and on the last page of the H1010-E) should be included in the *same* section of the application that an applicant is asked to provide SSNs – in the Household Information section on page 3 of H1010-B, and in Section A, page 2 of the H1010-E. The text should be in the same font as the question.

On the H1010E, Section D, #1, page 4, the question asks the household to identify non-citizens and provide alien registration numbers for each. Yet, in Section A, page 2, the household has already been asked to provide information for *all* family members, presumably including any aliens. This is duplicative, in that the household must fill out the same information twice for these family members. Further, without any explanation of why the information is needed, we are seriously concerned that it may make households that include immigrant members hesitant to provide the information or uncomfortable about applying for benefits.

- We strongly recommend deleting Section D and incorporating these questions about immigrants into Section A.
- We recommend splitting Section A into two questions: question #1 should ask for information on household members who *are* applying for benefits; and question #2 should ask for information about household members who are *not* applying for benefits. This would follow a similar format as the Household Information section in the H1010-B, which uses two questions to get information about all family members.
- We recommend adding a sentence in #2 that says something along the lines of: “Even if there are members of your household who are *not* applying for benefits, we need to know about them in order to determine your benefits correctly.”

Same day service for Food Stamp applicants

As you know, federal regulations give Food Stamp applicants the right to submit their application the same day that they contact their HHSC office. In an effort to foster same day service for Food Stamp applicants, the front page of the benefit application should be designed to encourage Food Stamp applicants to submit the minimum amount of information required to start the application process immediately, even if they don't have all of the information needed to complete their application that day. Along those lines, we recommend the following changes:

- The first page of both the H1010B and the H1010-E should: 1) include a place for an applicant to provide his/her name, address and signature, and 2) state clearly and in bold text that the applicant should turn in the first page that same day even if they cannot fill out the rest of the application (see suggested language in next bullet). The front page of the H1010-B currently does not have a space for the applicant to provide a signature.
- We recommend amending the language on page 1 of the H1010-E about same day service. Currently, the form states: “You can apply for services by filling out, signing and returning only this page. However, *we encourage you to fill out this entire application now* because we may be able to determine your benefits sooner.” (emphasis added) This language undermines the goal of providing same day service by encouraging applicants to fill out the *entire* application – something many will likely not be able to do while in the HHSC office – before submitting it. This language should be amended to read: “We encourage you to fill out, sign, and return only this page of your application today, even if you aren't able to fill it out the rest of the application. Please fill out and return the rest of the application as soon as possible to avoid a delay in determining your benefits.”

Again, we thank you for seeking public input on this process. Please do not hesitate to contact us if you have any questions about these comments. We look forward to working with HHSC throughout this process and offer our assistance to you.

Sincerely yours,



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