



## Integrated Eligibility/Call Center Update

*On January 20, the Health and Human Services Commission (HHSC) launched a three-month pilot of a new system for enrolling Texans in public benefits. The pilot is in Travis and Hays Counties and will test a new online application and the use of privately-run call centers to help people apply for Food Stamps, Medicaid, the Children's Health Insurance Program (CHIP), and Temporary Assistance for Needy Families (TANF cash assistance). If the pilot is successful, the system will be expanded to other areas of the state on a geographic basis beginning in April. This Policy Page provides an overview of the new system, explains how HHS clients will be affected during the rollout, and suggests ways for nonprofit and community-based organizations to make the transition to the new system as smooth as possible for their clients.*

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### OVERVIEW OF THE NEW SYSTEM

Traditionally, Texans have applied for health, food, and cash assistance benefits at a local health and human services office or through the mail, as is the case for Children's Medicaid and CHIP. Under the new integrated eligibility system, HHSC will close roughly one-third of its local offices, significantly reduce state eligibility staff, and replace these offices and staff with four centralized call centers and an Internet application. Clients will still have the option to apply at a local office, and the vast majority of Food Stamp applicants will still be required to have an in-person interview, but the ultimate goal of the new system is to encourage most clients to do their business over the phone, via mail/fax, or on the Internet.

In addition to the new enrollment model, the state is rolling out a new computer system – known as TIERS (Texas Integrated Eligibility Redesign System) – that will support the new system. TIERS has been tested in a limited environment and is currently used only in the five offices that serve Travis and Hays Counties (which make up the pilot area). The integrated eligibility system is expected to be rolled out over a period of 12 months. Prior to each phase of the rollout to the new system, all client data that is still in the “old” system (known as SAVERR) will have to be converted to TIERS. This is a massive undertaking that is critical to the success of the new system. If TIERS is not functioning smoothly, or does not have the capacity to operate in a statewide environment it could delay the rollout of the new system.

HHSC has contracted with Accenture, LLP, to develop and operate a significant portion of the new integrated eligibility system. Accenture heads up a team of companies known as the **Texas Access Alliance (TAA)**.

### TAA is responsible for

- developing and/or maintaining the technology that will support the new system (including the online application and TIERS),
- staffing the call centers,
- serving as the Medicaid managed care “enrollment broker” that helps people choose their health plans, and
- informing Children’s Medicaid clients and their families about routine preventive care and immunizations (Texas Health Steps or “EPSDT”).

### The state will continue to be responsible for

- overall management, monitoring, and oversight of the new system (including enforcing the terms of the contract with Accenture),
- staffing the local HHSC eligibility offices and providing teams of state staff to perform various functions in the call centers, and
- policy and rulemaking.

## **HOW THE SYSTEM WILL WORK ONCE STATEWIDE ROLLOUT IS COMPLETE**

This section describes how the new system will work once it is rolled out statewide. Not all of the following options are available yet to all applicants and clients. Some are restricted based on whether the person lives in the pilot area; others are limited according to which benefit the person is applying for or receiving. The next section “How to Apply for Benefits During the Rollout” explains how clients should access the system during the transition.

### ***The Use of Electronic Signatures in the New System***

#### **Establishing the filing date**

In the current system, the state requires a signed application in order to begin processing a request for benefits. Receipt of a signed application establishes the “**filing date**,” which is important for several reasons:

- 1) It marks the date back to which benefits are prorated once an application is approved.
- 2) It starts the clock on the application processing period, which is the amount of time a state worker has to approve (or deny) a person’s application – 30 days for food stamps, 45 days for Medicaid and TANF.
- 3) Therefore, any delay in the filing date could delay when benefits are approved and, for food stamps and TANF, how much benefits a family will receive the first month once its application is approved.

In the new system, a signature will still be required to establish the filing date. In most cases, the state will accept electronic or “e-signatures” – signatures obtained online or over the phone – for the purposes of establishing the filing date (see food stamp exception below). However, people who submit an application online or over the phone will still be required to provide a physical signature via fax, mail, or in person in order for their application to be approved. This means that no application can be approved 100% by phone or online. Failure to provide a physical signature (along with any other missing information) within the required time frames could lead to a delay or denial of benefits. The chart below shows how these requirements differ by program.

<b>Time frames for submitting a signed application and missing information</b>		
	TANF/Medicaid	Food Stamps
E-signature online accepted?	Yes	Yes
E-signature by phone accepted?	Yes	No (see below)
Date by which “physical” signature must be received (by mail/fax):		
If applicant submits a <u>complete</u> application over the phone/online	Within 39 days of submitting an e-signature	Within 30 days of submitting an online signature
If applicant submits an <u>incomplete</u> application over the phone/online	Within 10 days of the date the notice requesting the signature/missing information is sent to the applicant	

### **Food stamp applicants will not be able to apply over the phone**

Applicants for food stamps will not be able to initiate an application over the phone. This is because the federal Food Stamp Act provides only for e-signatures that are obtained online, but does not permit a phone call to be considered an e-signature. (There are no such restrictions in federal TANF or Medicaid law.) Although USDA has given the state the option to request a waiver of this law, and has agreed to approve such a request immediately, HHSC has not yet applied for the waiver. Until the state does obtain the necessary waiver, the call centers will not accept applications for food stamps over the phone. Instead, they will direct food stamp applicants to apply online, via the mail/fax, or at a local office. This is likely to cause a delay in the filing date for many families who don't have access to the Internet and can't get to a local office. Any delay in the filing date will also mean a cut in benefits for these families in the first month. CPPP has urged HHSC to apply for the waiver so that food stamp applicants will have equal access to the new system.

### ***Options for Applying for Benefits***

#### **211 → Call Centers**

Two call centers have been opened in Austin and Midland. Two more – in San Antonio and Athens – will be opened at some point during the rollout. The Midland call center is also the home of the “Document Processing Center” (DPC), the central mail facility where all applications and documentation will be scanned into the new system. Applicants and clients may access the call centers by dialing 2-1-1 (the state’s information and referral network). Persons who call 2-1-1 will reach an automated system that gives them one of two choices: 1) if seeking information about and/or referral to local services in the community, they will be connected to local 2-1-1 staff, or 2) if seeking public benefits (food stamps, Medicaid/CHIP, TANF) they will be automatically directed to the call centers. 2-1-1 staff will continue to refer callers who choose the first option to the call centers if they ask about public benefits, but are not expected to play any further role in helping people apply for benefits.

TAA staff at the call centers are expected to 1) screen applicants for expedited food stamps; 2) screen for eligibility for other benefits; 3) screen for disability or domestic violence that might exempt the applicant from TANF or food stamp work requirements; 4) help people fill out an application; 5) collect the verification needed to complete an application, including contacting the applicant for missing information and scheduling face-to-face interviews, if required; 6)

provide information to callers about the status of their application or benefits; and 7) send renewal packets to clients and assemble the information needed to complete the renewal process (the vast majority of all renewals will be done via mail in the new system, with no in-person interview requirement).

Clients may also use the call centers to report changes that affect their benefits, and an automated voice response (AVR) system will be available to provide general program information as well as answer questions about a person's benefits or application status. TAA staff cannot determine eligibility for benefits; state eligibility staff will be co-located at the call center to make final eligibility decisions (for applicants who aren't required to have a face-to-face interview).

### **Online Portal – [www.yourtexasbenefits.com](http://www.yourtexasbenefits.com)**

All applicants will eventually be able to fill out and submit an application for Food Stamps, Medicaid, and TANF benefits on this web site. Applicants will also be able to screen for benefits on this web site, check the status of an application or review their benefits, renew their benefits, and find referrals to other services in their community. Clients will not be able to report changes that affect their benefits online (e.g., address change/birth of child, etc.). **Remember:** Clients who apply online will still be required to submit via mail or fax all required documentation supporting their application (i.e., physical signature, proof of citizenship, verification of housing costs, etc.) within the required time frames (see chart above) in order for their application to be approved.

**Note:** As of now, families applying for children's Medicaid or CHIP only will continue to be directed to the TexCare Partnership's web site (which can be accessed at [www.texcarepartnership.com](http://www.texcarepartnership.com) or via the online portal) to fill out and download an application for children's health insurance. This application cannot be submitted online, but must be mailed or faxed to TAA. Families seeking only children's health insurance won't be able to submit an application online until the statewide rollout of the new system is complete, which won't be before December 2006. This is because the CHIP database is part of a separate system that will not be converted to TIERS until statewide rollout is complete.

### **Local HHSC Offices**

People may still apply for benefits at a local HHSC office, although there will be fewer of them once the rollout of the new system is complete (see the section "Office Closures and Staffing Reductions" for more information). It is important to understand that all applications in the new system must be processed by TAA, regardless of how a person chooses to apply. This means that even if a person walks into a local office to apply, once in the local office they will be directed to a "self-service center" and encouraged to apply 1) by calling 2-1-1 from a phone located in the office, or 2) online from a computer located within the office. Clients who request a paper application will be given one and directed to a fax machine in the local office to submit the application or given a stamped, addressed envelope to mail the application to TAA. Staff are required to assist applicants in using the self-service center, if requested.

If a person chooses to mail an application from the local office, rather than faxing it or applying via 211 or online, the processing of the application won't begin until it is received by TAA, which will delay the filing date. Applicants for TANF or Medicaid can avoid this delay by faxing their application, submitting it via 2-1-1, or applying online from the local office. Food Stamp applicants, as noted above, are not yet able to apply over the phone, but can avoid this delay by faxing their application or applying online.

**Face-to-face interviews and finger imaging:** Most new food stamp applicants will still be required to have a face-to-face interview with a state worker and be finger imaged, which will occur in a local office. State law does provide for exemptions from the face-to-face interview for aged and disabled persons and people who cannot get to a local office. The criteria for an exemption are listed on the paper application (Form 1010). Adult Medicaid and TANF applicants will be exempt from the face-to-face interview (as are applicants for Children's Medicaid under the current system), which means TANF applicants will also be exempt from finger imaging. If a face-to-face interview is required, TAA will schedule the interview in the TIERS system and inform the local office when the application is complete. TAA will also send a notice to the client with the interview time and location.

**Note:** There is no finger imaging requirement in the Medicaid program, although HHSC is currently testing a finger imaging system for Medicaid recipients and providers that could eventually be implemented statewide.

### **Mail/Fax**

Applicants in the new system may continue to apply for benefits by mailing or faxing their application to TAA. Paper applications may be downloaded from HHSC's web site at <http://www.dads.state.tx.us/handbooks/TexasWorks/forms/index.asp> (select Form 1010), picked up at a local office, or requested online at [www.yourtexasbenefits.com](http://www.yourtexasbenefits.com). Applications may also be available at some local nonprofit and community-based organizations (see section "Role of Nonprofit Organizations and Community Groups During the Rollout"). All mail (application and supporting documentation) should be sent to HHSC, P.O. Box 14900, Midland, TX 79711-4900 or faxed to 1-877-HHSC-TEX (447-2389).

### **Expedited Food Stamps**

Under federal food stamp law, families qualify for expedited food stamps if 1) they have less than \$100 in savings and less than \$150 in income, or 2) include a migrant or seasonal farm worker, or 3) do not have enough money to pay the current month's bills. Families that qualify are entitled to receive expedited benefits within 24 hours of submitting an application (this is a state law; the federal law states that applicants must receive expedited benefits within three days). Around 40% of food stamp recipients in Texas receive expedited benefits. Expedited applicants do not need to complete the whole application or provide any verification initially, however they are required to have a face-to-face interview and be finger imaged for their benefits to be approved. In the new system, regardless of how a person chooses to apply, TAA staff will be required to screen for expedited food stamps and ensure that families who qualify are interviewed within 24 hours of submitting an application. Given the new application options in the new system, there will be some changes in how the expedited process will work depending on how a person chooses to apply. If a person

- walks into a local HHSC office, staff will direct the person to call 2-1-1 for expedited screening. After the screening is complete, local office staff will provide an application to the person to fax to TAA. **Note:** Local office staff won't screen an applicant for expedited food stamps unless requested by the applicant.
- If a person calls 2-1-1 and is screened eligible, TAA staff will direct the person to submit an application online, via fax, or at a local HHSC office. If a person applies online and is screened eligible, the web site will instruct the person to call 2-1-1 within 24 hours of submitting the application to set up an appointment.
- All mailed and faxed applications received by TAA also will be screened for expedited services.

Regardless of how they apply, applicants that are screened eligible for expedited food stamps should be contacted within 24 hours of submitting their application to schedule a face-to-face interview and be finger imaged.

## **HOW TO APPLY FOR BENEFITS DURING THE ROLLOUT**

Some of the new options are not yet available to all applicants/clients. This section explains how people should access the system during the rollout according to where they live and/or which benefits they are seeking or receiving.

### ***How to Apply Inside the Pilot Area***

#### **New Applicants**

Starting February 16, anyone living in Travis and Hays counties should be able to apply for benefits via any of the options available in the new eligibility system (except food stamp applicants, who won't be able to apply over the phone).

#### **Current Recipients**

Food Stamp recipients with a renewal date after February 1 can use the new system to renew their benefits or report a change that affects their benefits. TANF and Medicaid clients (adult/children's/and aged & disabled) with a renewal date after March 1 can use the new system to renew their benefits or report a change that affects their benefits (renewals for TANF and Medicaid clients with a renewal date before March 1 will be processed in the old system).

### ***How to Apply in a "Non-Rolled Out" Area***

All applications for CHIP or Children's Medicaid will be processed in the new system regardless of where the client lives. Applicants may apply via 2-1-1, by fax/mail, at the local office, or by printing or filling out an application (**Remember:** As of now, families applying only for Children's Medicaid or CHIP cannot submit an application online.)

For now, applications for all other benefits – Food Stamps/TANF/Adult Medicaid/Aged & Disabled Medicaid – will continue to be processed in the old system. Applicants and clients should continue to go to a local office to apply. **Note:** This could change soon, so stay posted.

**Exception:** If a person lives outside of the pilot area, but has a case that was processed in the TIERS system, then that person's application or renewal will be processed in the new system regardless of the benefit the client is applying for or receiving. (There are TIERS cases in every region of the state, mostly the result of clients moving outside of the TIERS pilot area.)

### ***Applicants Who Apply Through the "Wrong" Channel During the Rollout***

It is the state caseworker's or TAA staff's responsibility to determine which system should be used to process an application or renewal.

#### **If an applicant who is **not** supposed to use the new system**

- calls 2-1-1, the applicant will be told to contact their local HHSC office. **However**, if an applicant requests a paper application from 2-1-1 or online, TAA staff are required to mail that application the same day that request is received.
- applies online, faxes, or mails an application to TAA, TAA will forward that application to the correct local office for processing.

### If an applicant who is supposed to use the new system

- calls the local HHSC office to apply, the applicant will be referred to 2-1-1, directed to apply online, or told to mail or fax an application request to TAA.
- walks into a local office, the applicant will be given an application and referred either to 2-1-1 or to the web site to file the application, or told to mail or fax the application to TAA.

If a local HHSC office receives an application or renewal packet that should have been sent to TAA, state staff will forward it to TAA staff for processing. Similarly, if an application or renewal is submitted to TAA in error, TAA staff will send the packet to local office for processing.

## **STATEWIDE ROLLOUT SCHEDULE**

HHSC has posted a “projected roll-out schedule” on its web site at [http://www.hhs.state.tx.us/consolidation/IE/Projected\\_RolloutSchedule.shtml](http://www.hhs.state.tx.us/consolidation/IE/Projected_RolloutSchedule.shtml). The next phase of the roll-out is scheduled for the Hill County in May, followed by Bexar County in June, with statewide rollout expected to be complete by December 2006. This schedule is likely to change, so be sure to keep checking it for up-to-date information on when the new system is rolling out in your area.

### ***Office Closures and Staffing Reductions***

No office closures or staffing reductions have occurred yet in conjunction with the rollout to the new system, and none are planned until May 2006. At that time, HHSC plans to begin closing offices and reducing eligibility staff incrementally, in conjunction with the geographic rollout of the new system. However, a significant number of staff have quit since HHSC’s plans for the new system were announced in March 2004. This exodus continued when, in October 2005, HHSC sent “advance” pink slips to staff whose jobs will eventually be terminated. Before the changes in the system were announced a few years ago, there were approximately 6,900 state eligibility workers statewide. In the new system, there will be a total of 5,400 staff, including both state and TAA staff. A projected breakdown of staff follows:

- 1,800 state staff in 164 full-time and 44 “satellite” offices (to conduct face-to-face interviews and make eligibility decisions),
- 200 state staff in call centers (for quality assurance purposes, appeals, and to make eligibility decisions when a face-to-face interview is not required),
- 300 state staff in traveling units (these units will be deployed as needed to assist in the rollout and make home visits to clients who can’t get to a local office or have trouble accessing the new system),
- 600 out-stationed workers in hospitals/clinics (same as there are now), and
- 2,500 TAA (contractor) staff at the call centers

Eventually, the state plans to close 99 offices. A list of office locations and closures is available on HHSC’s web site at: <http://www.hhs.state.tx.us/maps/listing.shtml>. This list is searchable by county, city, or office status. HHSC will keep 164 full-time offices and 44 satellite offices open. It is not yet clear what days and hours the satellite offices will be open, or how their schedules will be determined. Again, the decisions about which offices to close and how many offices are needed could change, so stay posted.

## **MONITORING OF THE NEW SYSTEM**

Diligent and thorough monitoring of the new system in the initial pilot area and throughout the rollout will be critical to identify and correct problems as they occur, and also to ensure that the system does not move forward in the face of major problems that affect access or program integrity. HHSC's monitoring plan is largely based on the performance requirements and deliverables laid out in its contract with Accenture. These include general access indicators, such as the number of applications processed on a daily basis, timeliness in application processing, and caseload fluctuations, along with performance measures related to customer service (e.g., number of minutes on hold, number of complaints, customer satisfaction) and overall system functionality (i.e., is TIERS correctly calculating benefits).

USDA (the federal agency with food stamp oversight) will also be monitoring the rollout. So far USDA has approved four months of funding – enough for HHSC to implement the new system in the pilot area and the Hill Country. (Texas and the federal government share the cost of administering the food stamp and Medicaid programs.) USDA has stated it will approve more funding to expand the system to other areas of the state on an incremental basis once the system demonstrates in the pilot area that it can maintain access to food stamps, ensure program integrity, and has the capacity to function in a statewide environment. USDA has developed a list of criteria it will use to judge the overall functionality and capacity of the system and ensure basic program standards are maintained. Again, these criteria are largely based on the performance measures in the Accenture contract. USDA plans to have staff “on the ground” (in both local offices and at the call centers) to monitor the rollout.

There are two areas where both the state's and USDA's monitoring plans appear deficient. First, neither plan pays adequate attention to the challenges that expanded reliance on technology presents for vulnerable populations, including persons with disabilities, seniors, the homeless, domestic violence victims, or persons with limited English proficiency. Without an effort to test the new system's ability to serve these vulnerable populations during the rollout, implementation could result in reduced access to food stamps and other programs in violation of the Americans with Disabilities Act, Title VI of The Civil Rights Act, and the civil rights protections in the Food Stamp Act. Although the new system might offer great benefit to the savviest customer, at the same time it might discriminate against more vulnerable and harder-to-serve families – arguably, the families with the greatest need. Indeed, at the end of the day, the true test of Texas' new system will be whether it is capable of serving the weakest and most vulnerable Texans.

Second, neither plan looks closely enough at “procedural denials” – when someone's application is denied before the state can collect enough information to determine his/her eligibility, for example failing to show for an interview. Collecting data on procedural denials would help the state identify any particular trends in the reasons for applications being denied or abandoned, which would tell us why people are falling through the cracks, where the breakdown occurs, and who is most likely not to make it through the system. This kind of information will be critical for a complete and accurate assessment of the new system.

## **ROLE OF NONPROFIT ORGANIZATIONS AND COMMUNITY GROUPS DURING THE ROLLOUT**

### ***Assisting Clients With the New System***

Nonprofit and community-based organizations that work with low-income Texans can play a vital part in ensuring a smooth transition to the new system. Even those organizations without



the resources to assist clients in applying for benefits in the new system can help by simply understanding and preparing their clients for the changes coming their way. Other examples of ways local organizations can be involved include providing:

- an application pick-up or drop-off point, or both,
- a telephone to call 211,
- a printer to print an application summary from the Internet,
- access to a fax machine to fax an application and other required documents,
- access to a computer to apply for assistance online, or
- general assistance in explaining the application process.

For those groups able to play a more active role, HHSC is offering training on the new system to organizations that request it. If your organization is interested, you should contact Mary Lou Franks at [marylou.franks@hhsc.state.tx.us](mailto:marylou.franks@hhsc.state.tx.us) or (512) 206-5013. HHSC is also offering web-based tutorials and is planning local community forums to coincide with the rollout of the new system. For a schedule of these forums see [http://www.hhs.state.tx.us/consolidation/IE/meeting\\_dates.shtml](http://www.hhs.state.tx.us/consolidation/IE/meeting_dates.shtml).

### ***Monitoring and Reporting***

Nonprofit and community-based organizations can also play a monitoring role during the rollout to help identify and correct problems in the new system as they occur. In particular, your organization may be able to help fill in the holes in the state's monitoring plan by paying close attention to any problems experienced by vulnerable populations. In fact, USDA has expressly asked for assistance from the nonprofit and advocacy community in identifying problems related to food stamp access during the rollout, and has appointed a staff person to serve as the primary point of contact for reporting food stamp-related problems. [You can report food stamp-related problems directly to Sandy Barton at \[sandy.barton@fns.usda.gov\]\(mailto:sandy.barton@fns.usda.gov\) or to CPPP \(\[hagert@cphp.org\]\(mailto:hagert@cphp.org\)\) and we will forward it to the USDA.](#) If you do send information directly to the USDA, we would appreciate you keeping us informed as well. CPPP has also developed a standardized tracking form to assist local organizations in monitoring and sharing their clients' experiences in the new system. Please contact Celia Hagert at 512-320-0222 x110 or [hagert@cphp.org](mailto:hagert@cphp.org) for a copy of this form or to learn more about how you can get involved in CPPP's monitoring efforts.

### **HOW DO I STAY INFORMED?**

You can sign up for email updates about the rollout on HHSC's web site at <http://www.hhs.state.tx.us/consolidation/IE/IE.shtml>. This web site also includes information about upcoming meetings, presentations, and updates on the rollout and office closures.

CPPP posts all of its updates about integrated eligibility at <http://www.cphp.org/subcategory.php?cid=3&scid=7>.

The Center for Public Policy Priorities is a nonprofit, nonpartisan research organization committed to improving conditions for low- and moderate-income Texans. To make a donation, sign up for free E-Mail Updates, or access the rest of our work, visit [www.cphp.org](http://www.cphp.org).